

4.11 LAND USE AND PLANNING

This chapter describes the potential impacts associated with the adoption and implementation of the proposed project that are related to land use and planning. A summary of the relevant regulatory framework and existing conditions is followed by a discussion of project impacts and cumulative impacts.

4.11.1 ENVIRONMENTAL SETTING

4.11.1.1 REGULATORY FRAMEWORK

State Regulations

California Housing Element Law

California Housing Element Law¹ includes provisions related to the requirements for housing elements of local government general plans. Among these requirements, some of the necessary parts include an assessment of housing needs and an inventory of resources and constraints relevant to the meeting of these needs. Additionally, in order to ensure that counties and cities recognize their responsibilities in contributing to the attainment of the State housing goals, this section of the Government Code calls for local jurisdictions to plan for and allow the construction of a share of the region's projected housing needs, known as the Regional Housing Needs Allocation. The City of San Rafael's 2015–2023 Housing Element Update was adopted in January 2015. Though it is not being updated as part of the proposed General Plan 2040, the goals, policies, and programs in the proposed General Plan 2040 would continue to support adequate housing in San Rafael. The next housing element update will be in 2021 to 2022, with adoption before January 31, 2023.

Cortese-Knox Act

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000² established a Local Agency Formation Commission (LAFCo) in each county in California, and authorized these commissions to review, approve, or deny proposals for boundary changes and incorporations for cities, counties, and special districts. The LAFCo established a "sphere of influence" (SOI) for cities within their jurisdiction that describes the city's probable future physical boundaries and service area. The San Rafael SOI is regulated by the Marin County LAFCo. The San Rafael SOI is shown on Figure 3-2 in Chapter 3, Project Description, of this Draft Environmental Impact Report (EIR). The City does not propose to annex or de-annex any areas of the SOI as part of the proposed project.

¹ Government Code Sections 65580–65589.8.

² California Government Code, Sections 56000–56001.

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Regional Regulations

Plan Bay Area

As discussed in Chapter 4, Environmental Analysis, of this Draft EIR, *Plan Bay Area* is the regional transportation plan/sustainable community strategy, as mandated by the Sustainable Communities and Climate Protection Act (Senate Bill 375). *Plan Bay Area* lays out a development scenario for the nine-county Bay Area region that works to align transportation and land use planning in order to reduce vehicle miles traveled through modified land use patterns. The current *Plan Bay Area* projects growth and development patterns through 2040 and is currently being updated to extend to 2050.

Plan Bay Area is prepared and regularly updated by the Metropolitan Transportation Commission (MTC) in partnership with the Association of Bay Area Governments (ABAG), Bay Area Air Quality District (BAAQMD), and the Bay Conservation and Development Commission (BCDC). Each of the agencies has a different role in regional governance. ABAG primarily does regional land use planning, housing, environmental quality, and economic development; MTC is tasked with regional transportation planning, coordinating, and financing; BAAQMD is responsible for regional air pollution regulation; and BCDC's focus is to preserve, enhance, and ensure responsible use of the San Francisco Bay.³

As described in Chapter 4, Environmental Analysis, *Plan Bay Area* designates Priority Development Areas (PDAs) and Transit Priority Areas (TPAs) throughout the region. PDAs are areas along transportation corridors which are served by public transit that allow opportunities for development of transit-oriented, infill development within existing communities that are expected to host the majority of future development. TPAs are similar in that they are formed within one-half mile around a major transit stop such as a transit center or rail line. Overall, over two-thirds of all regional growth by 2040 is allocated to PDAs and TPAs. As shown on Figure 4-1, the EIR Study Area has three PDAs and three TPAs. The PDAs include the North San Rafael PDA, Civic Center Smart Station TPA, Southeast San Rafael / Canal PDA, Downtown San Rafael SMART Station PDA and TPA, and a very small portion of the Larkspur TPA.

Plan Bay Area 2040 distributes future growth across the San Francisco Bay Area region in order to meet its GHG emissions reduction, housing, and other performance targets, but it is not intended to override local land use control. Cities and counties, not MTC/ABAG, are ultimately responsible for the manner in which their local communities continue to be built out in the future. For this reason, cities and counties are not required to revise their land use policies and regulations, including general plans, to be consistent with the regional transportation plan or an alternative planning strategy. Rather than increase regional land use control, *Plan Bay Area 2040* facilitates implementation by expanding incentives and opportunities available to local jurisdictions to support growth in PDAs. In addition to funding transportation and planning projects in PDAs, *Plan Bay Area 2040* sets the stage for cities and counties to increase the efficiency of the development process, if they choose, for projects consistent with *Plan Bay Area* and other state legislation.⁴

³ Metropolitan Transportation Commission and Association of Bay Area Governments, *Plan Bay Area 2040*, Strategy for a Sustainable Region, page 69.

⁴ *Plan Bay Area* website, Frequently Asked Questions page: Does *Plan Bay Area* override local land use control?, <https://www.planbayarea.org/2040-plan/quick-facts/faq-page#n4851>, accessed on April 30, 2019.

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San Francisco Bay Conservation and Development Commission

In 1969, the McAteer-Petris Act designated the San Francisco BCDC as the agency responsible for the protection of the San Francisco Bay and its natural resources. BCDC fulfills this mission through the implementation of the *San Francisco Bay Plan* (Bay Plan), an enforceable plan that guides the future protection and use of San Francisco Bay and its shoreline. The Bay Plan includes a range of policies on public access, water quality, dredging and fill, and project design. The Bay Plan also designates shoreline areas that should be reserved for water-related sports, industry, and public recreation; airports; and wildlife areas. Impacts related to biological resources and water quality are discussed in Chapter 4.4, Biological Resources, and Chapter 4.10, Hydrology and Water Quality, of this Draft EIR.

BCDC has jurisdiction within 100 feet of the San Francisco Bay's shoreline, and proposed development in its jurisdiction is subject to BCDC *Public Access Design Guidelines*, which are intended to ensure that maximum feasible public access is provided. BCDC defines "public access" to include physical public access to and along the shoreline of the San Francisco Bay and visual public access to the San Francisco Bay from other public spaces.⁵ Physical improvements, as defined by BCDC, may include waterfront promenades, trails, plazas, play areas, overlooks, parking spaces, landscaping, site furnishings, and connections from public streets to the water's edge.⁶ Note that the San Rafael Canal is not within BCDC's jurisdiction.

Marin Countywide Plan

The 2017 *Marin Countywide Plan* is a comprehensive long-range guide for land use in the unincorporated portions of the county, including land outside of San Rafael's city limit but within the EIR Study Area. The *Marin Countywide Plan* includes provisions for "fringe" development. The *Marin Countywide Plan* directs the County to generally maintain land use designations in "urban fringe areas" that are consistent with land use designations surrounding urban areas. This direction is in the "Community Development" section of the built environment element:

Goal CD-6: Confinement of Urban Development. Concentrate new medium- to high-intensity land uses at infill areas where services can be provided.

Policy CD-6.1: Coordinate Urban Fringe Planning. Seek city review of development proposed adjacent to urban areas. Discourage development requiring urban levels of service from locating outside urban service areas. Coordinate with cities and towns regarding their plans and rules for annexing urbanized areas.

⁵ San Francisco Bay Conservation and Development Commission, 2005, *Public Access Design Guidelines for the San Francisco Bay*, page 3.

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Local Regulations

San Rafael General Plan 2020

The City of San Rafael 2020 General Plan goals, policies, and programs that are relevant to land use and planning are primarily in the Land Use (LU) and Housing (H) Elements. As part of the proposed project, some existing General Plan goals, policies, and programs would be amended or substantially changed, and new policies would be added. A comprehensive list of policy changes is provided in Appendix B, Proposed General Plan Goals, Policies, and Programs, of this Draft EIR. Applicable goals, policies, and programs are identified and assessed for their effectiveness and potential to result in an adverse physical impact in Section 4.11.3, Impact Discussion.

San Rafael Municipal Code

Besides the General Plan, the City of San Rafael Municipal Code (SRMC) is the primary tool that regulates physical development in San Rafael. The SRMC contains all ordinances for the city and identifies land use categories, site development regulations, and other general provisions that ensure consistency between the General Plan and proposed development projects. The SRMC is organized by title, chapter, and section. Most provisions related to land use impacts are in Title 14, Zoning Ordinance. The primary purpose of the Zoning Ordinance is to “promote and protect the public health, safety, peace, comfort and general welfare” of the city of San Rafael, with specific purposes listed under Section 14.01.030, Purposes. The Zoning Ordinance is the mechanism used to implement the land use goals, policies, and programs of the General Plan and to regulate all land use in the city. The Zoning Ordinance describes zoning designations and contains the zoning map and development standards for the zoning designations.

Other City Plans

All specific plan, area plans, master plans, or similar plans—such as a climate action plan or a hazard mitigation plan—and zoning in the city must be consistent with the General Plan. The following describes some of the other key plans that guide development in San Rafael.

Station Area Plans

The *Civic Center Station Area Plan*, approved in August 2012 and amended September 2013, sets a conceptual framework for development and circulation improvements in the area immediately adjacent to the Civic Center SMART (Sonoma-Marin Area Rail Transit) station. The goals of the plan are to set the stage for creating a vibrant, mixed-use, livable area supported by a mix of transit opportunities, and it focuses on key pedestrian, bicycle, and transit connections as well as identifying transit-oriented land use opportunities.⁷

⁷ City of San Rafael, adopted August 2012, amended September 2013, Civic Center Station Area Plan and associated Resolution No. 13618.

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The *Downtown Station Area Plan*, approved June 2012, assesses the area within one-half mile of the downtown SMART station, an area which is largely under the Downtown San Rafael PDA and TPA designated by *Plan Bay Area 2040*. The *Downtown Station Area Plan* considers traffic, pedestrian and bicycle connections, and land use pattern conditions—such as the location of residential neighborhoods in relation to transit facilities and commercial development.

Bicycle and Pedestrian Master Plan

The *Bicycle and Pedestrian Master Plan*, updated in 2018, contains an analysis of priority areas that is intended to guide development of the bicycle and pedestrian network in San Rafael. The plan encourages using natural and man-made corridors, including shorelines, for the alignment of future multiuse trails, and also encourages construction and updating of bike and pedestrian paths along major transportation corridors.

Climate Change Action Plan 2030

The City of San Rafael *Climate Change Action Plan (CCAP) 2030* was adopted in May 2019. The CCAP includes a series of strategies intended to help the City meet the greenhouse gas emissions reduction target of 40 percent below 1990 emissions levels by 2040 and 80 percent below 1990 levels by 2050. The CCAP includes a variety of regulatory, incentive-based, and voluntary strategies that are expected to reduce emissions from both existing and new development in San Rafael.

4.11.1.2 EXISTING CONDITIONS

This section describes the existing General Plan 2020 land use designations and Zoning Districts in the EIR Study Area as a whole and identifies which land use designations and Zoning Districts are specific to the Downtown Precise Plan Area.

Existing General Plan 2020 Land Use Designations

San Rafael is known for a range of urban and suburban land uses, including a variety of residential neighborhoods, a downtown area, parks, and business centers. San Rafael's development pattern is largely consistent with the patterns of adjacent communities. The existing General Plan 2020 land use designations are listed below. The 20 land use designations that appear in the Downtown Precise Plan Area are shown in **bold**, but only 6 of these are mapped in the Downtown exclusively; the others appear Downtown as well as elsewhere in the city.

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- **Hillside Residential Resource**
- Hillside Residential
- Large Lot Residential
- **Residential-Low Density**
- **Residential-Medium Density**
- **High Density Residential**
- **General Commercial**
- **Neighborhood Commercial**
- **Retail Office**
- **Office**
- **Residential Office**
- **Hetherton Office**
- **Lindaro Mixed Use**
- **Lindaro Office**
- **Second/Third Mixed Use**
- **Fourth Street Commercial Core**
- **Fifth/Mission Residential/Office**
- **West End Village**
- **Park**
- Open Space
- Conservation
- **Public-Quasi Public**
- **Industrial**
- Light Industry/Office
- **Marine Related**
- Mineral Resources
- Airport/Recreation

Existing Zoning Districts

The SRMC Title 14, Zoning, implements the General Plan land use designations by establishing comprehensive regulations and development standards for each Zoning District. San Rafael has 36 Zoning Districts and 4 overlay zones. The existing overlay zones and Zoning Districts are listed below. Existing Zoning Districts in the Downtown Precise Plan Area are shown in **bold**, but only a few of these are mapped in the Downtown exclusively; most appear Downtown as well as in other parts of the city.

Overlay Zones

- Hillside Development Overlay District (-H)
- Wetland Overlay District (-WO)
- Eichler/Alliance Overlay District (-E/A)
- Canalfront Review Overlay District (-C)

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Zoning Districts

- Single-Family Residential District Minimum Lot Size: 2 Acres (R2a)
- Single-Family Residential District Minimum Lot Size: 1 Acres (R1a)
- Single-Family Residential District Minimum Lot Size: 20,000 Square Feet (R20)
- Single-Family Residential District Minimum Lot Size: 10,000 Square Feet (R10)
- Single-Family Residential District Minimum Lot Size: 7,500 Square Feet (R7.5)
- Single-Family Residential District Minimum Lot Size: 5,000 Square Feet (R5)
- Duplex Residential District 2,500 Square Feet Per Dwelling Unit (DR)
- Multifamily Residential District (Medium Density) 5,000 Square Feet Per Dwelling Unit (MR5)
- Multifamily Residential District (Medium Density) 3,000 Square Feet Per Dwelling Unit (MR3)
- **Multifamily Residential District (Medium Density) 2,500 Square Feet Per Dwelling Unit (MR2.5)**
- Multifamily Residential District (Medium Density) 2,000 Square Feet Per Dwelling Unit (MR2)
- Multifamily Residential District (High Density) 1,800 Square Feet Per Dwelling Unit (HR1.8)
- Multifamily Residential District (High Density) 1,500 Square Feet Per Dwelling Unit (HR1.5)
- **Multifamily Residential District (High Density) 1,000 Square Feet Per Dwelling Unit (HR1)**
- **General Commercial District (GC)**
- **Neighborhood Commercial District 1,800 Square Feet Per Dwelling Unit (NC)**
- Office District (O)
- **Commercial/Office District 1,000 Square Feet Per Dwelling Unit (C/O)**
- **Residential/Office District 1,000 Square Feet Per Dwelling Unit (R/O)**
- Francisco Boulevard West Commercial District (FBWC)
- **Fourth Street Retail Core (4SRC)**
- Cross Street Mixed Use District (CSMU)
- **Hetherton Office District (HO)**
- **Second/Third Mixed Use District East District (2/3 MUE)**
- **Second/Third Mixed Use District West District (2/3 MUW)**
- **West End Village District (WEV)**
- **Fifth/Mission Residential/Office District (5/M R/O)**
- Industrial District (I)
- Light Industrial/Office District (LI/O)
- Core Canal Industrial/Office District (CCI/O)
- Lindero Mixed Use District (LMU)
- Planned Development District (PD)
- **Marine District (M)**
- **Public/Quasi-Public District (P/QP)**
- **Parks/Open Space District (P/OS)**
- Water District (W)

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4.11.2 STANDARDS OF SIGNIFICANCE

Pursuant to Appendix G, Environmental Checklist Form, of the California Environmental Quality Act (CEQA) Guidelines, implementation of the proposed project would result in significant land use and planning impacts if it would:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.
3. Result in a cumulative impact related to land use and planning.

4.11.3 IMPACT DISCUSSION

LU-1	Implementation of the proposed project could physically divide an established community.
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General Plan 2040

The physical division of an established community typically refers to the construction of a physical feature or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community or between a community and outlying areas. For example, an airport, roadway, or railroad track through an existing community could constrain travel from one side of the community to another or impair travel to areas outside of the community.

As discussed in Chapter 3, Project Description, of this Draft EIR, the proposed General Plan 2040 builds off the current General Plan 2020 by incorporating the topics that are now required by State law and revising relevant goals, policies, and programs to meet those requirements. An overview of major changes to the goals, policies, and programs in each General Plan 2040 element is provided in Section 3.7.1.2, General Plan Goals, Policies, and Programs, in Chapter 3, Project Description. As described in detail in Chapter 3, the proposed General Plan 2040 includes changes that may influence the types and intensities of land uses permitted on different sites in the city.

- It changes how residential density is measured—from “gross” density to “net” density—because most of the city’s future development is expected on small infill sites, and so that the General Plan land use designations align with Zoning Districts.
- It consolidates General Plan land use designations from 28 to 19 to improve consistency between the proposed General Plan and the existing zoning regulations and to streamline General Plan 2040.
- It includes three new General Plan land use designations: Downtown Mixed Use; Parks, Recreation, and Open Space; and Sea level Rise Prediction Area (an overlay with underlying base land use designations). No Zoning District changes are proposed other than to change the Zoning District in the Downtown Precise Plan Area, which is discussed below under the subheading “Downtown Precise Plan.”

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The proposed General Plan 2040 also extends the planning horizon forward by 20 years, consistent with other regional plans, including *Plan Bay Area 2040*. Population projections are discussed in Chapter 4.14, Population and Housing, of this Draft EIR.

Potential future development from implementation of the proposed General Plan 2040 would not result in a change in land use or zoning that would cause the construction or removal of any physical features or means of access throughout the EIR Study Area or the region. The proposed General Plan 2040 would increase development potential in the EIR Study Area; however, potential future development would occur on a limited number of vacant parcels and in the form of infill/intensification on sites already developed and/or underutilized, and/or in close proximity to existing development and infrastructure. Additionally, the proposed General Plan 2040 maintains the existing roadway patterns and would not include any new major roadways or other physical features through existing neighborhoods that would create new physical barriers in the EIR Study Area. Therefore, implementation of the proposed General Plan 2040 would not physically divide an established community, and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

Downtown Precise Plan

The proposed Downtown Precise Plan is a critical part of the proposed General Plan because roughly half of the city's future housing and employment growth is expected to occur in the Downtown Precise Plan Area. The Downtown Precise Plan identifies growth and development opportunities; provides the principles, policies, and strategies to guide investment; and proposes a form-based code to replace the current zoning standards. Once the Downtown Precise Plan is adopted and the San Rafael Zoning Ordinance is amended, the Downtown Precise Plan will serve as the overarching guiding document that provides strategies and recommendations for growth within the Downtown Precise Plan Area.

Like potential future development in the remainder of the EIR Study Area outside of the Downtown Precise Plan Area, such development would occur on a limited number of vacant parcels and in the form of infill/intensification on sites already developed and/or underutilized and/or in close proximity to existing development and infrastructure. The proposed Downtown Precise Plan distinguishes areas in the Downtown Precise Plan Area with four distinct sub-areas, which group portions of the Downtown Precise Plan Area that are similar in character. Recommendations in each sub-area reflect existing conditions to enhance the connectivity and design character of the sub-area. Future development under the proposed project would generally retain the existing roadway patterns and would include circulation improvements, such as access points, sidewalks, and bike lanes/paths, that are intended to improve circulation and multimodal connectivity. These improvements do not propose any new major roadways or other physical features through parcels designated for residential use or other communities that would create new barriers in the Downtown Precise Plan Area or greater San Rafael. Therefore, while land use and zoning changes are proposed within the Downtown Precise Plan Area, the proposed project would not divide existing established community, and impacts would be *less than significant*.

Significance without Mitigation: Less than significant.

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LU-2 Implementation of the proposed project could cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

General Plan 2040

The proposed General Plan's potential to conflict with other applicable plans and regulations adopted for the purpose of avoiding or mitigating an environmental effect is discussed in detail in the other environmental topic chapters of this Draft EIR. Specifically, these discussions are in Chapter 4.3, Air Quality; Chapter 4.4, Biological Resources; Chapter 4.5, Cultural and Tribal Cultural Resources; Chapter 4.8, Greenhouse Gas Emissions; Chapter 4.9, Hazards and Hazardous Materials; Chapter 4.10, Hydrology and Water Quality; Chapter 4.13, Noise; Chapter 4.14, Population and Housing; Chapter 4.15, Public Services and Recreation; Chapter 4.16, Transportation; Chapter 4.17, Utilities and Service Systems; and Chapter 4.18, Wildfire. As discussed in these chapters, implementation of the proposed General Plan 2040 would not be inconsistent with or obstruct the implementation of any applicable plan or regulation adopted for the purposes of avoiding or mitigating an environmental effect.

The proposed General Plan 2040 Land Use (LU) Element maintains consistency with the *Marin Countywide Plan* through a goal, policies, and a program that ensure land use planning decisions inside and adjacent to the San Rafael city limits do not conflict with one another. The following goal, policies, and program ensure a collaborative process as potential future development outside the San Rafael city limits occurs:

Goal LU-1: Well-Managed Growth and Change. Grow and change in a way that serves community needs, improves fiscal stability, and enhances the quality of life.

- **Policy LU-1.5: Development Beyond the Urban Service Area.** Retain undeveloped areas outside of San Rafael's Urban Service Area boundary but within its Planning Area in agricultural or open space uses.
- **Policy LU-1.7: Land Use Planning in Surrounding Jurisdictions.** Continue to work with the County of Marin and the cities of Larkspur, Novato, Ross, and San Anselmo to ensure that land use changes outside the San Rafael city limits will positively affect San Rafael.
 - **Program LU-1.7A: Development Adjacent to San Rafael.** Work with the County, other jurisdictions, neighborhood groups, and residents to review applications for development in areas adjacent to San Rafael's city limits or within the Sphere of Influence.

The proposed General Plan 2040 is the primary planning document for the city of San Rafael. The proposed update is intended to ensure consistency between the General Plan, Zoning Ordinance, and State law. Because the proposed General Plan 2040 is the overriding planning document for the city, and because the proposed General Plan 2040 involves amending the General Plan 2020 and the Zoning Ordinance in the Downtown Precise Plan Area to improve consistency, the impact would be *less than significant*.

Significance without Mitigation: Less than significant.

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Downtown Precise Plan

As stated above, the General Plan is the primary planning document for the City of San Rafael. Adoption and implementation of the proposed Downtown Precise Plan would further the objectives and policies of the General Plan and would not obstruct its attainment. The proposed Downtown Precise Plan is intended to ensure consistency between the General Plan and Zoning Ordinance.

The proposed Downtown Plan includes the Downtown Code, which includes an amendment to the City's Zoning Ordinance in order to be consistent with the Downtown Precise Plan Area's proposed Downtown Mixed Use land use designation. The proposed Downtown Code has been prepared to reduce potential environmental impacts from future development in the Downtown Precise Plan Area. Other than as identified, no other development regulations are being modified or added as part of the proposed Downtown Precise Plan. The proposed Downtown Code would replace existing Zoning Districts and regulations for all of the properties in the Downtown Precise Plan Area with the exception of a few parcels in the Latham Street area, which will retain their Multifamily Residential District ([Medium Density] 2,500 square feet per dwelling unit [MR2.5]) zoning designation, and the existing open space zoning designations. The proposed Downtown Code would establish new Downtown Zones for the Downtown Precise Plan Area. Each of the Downtown Zones are established based on the intent of the desired physical form and character of particular environments envisioned in the proposed Downtown Precise Plan. The proposed zones focus on mixed-use, walkable areas of the Downtown Precise Plan Area and range in function and intensity.

While the proposed Downtown Precise Plan is the guiding document for the Downtown Precise Plan Area, land use planning and policies for the Downtown Precise Plan Area are dictated by the proposed General Plan 2040. The Downtown Precise Plan would be adopted as part of the General Plan 2040. The proposed Downtown Precise Plan complements and provides more specifics to the proposed General Plan 2040 but does not include policy details that override the policies which would be adopted as part of the proposed General Plan 2040. Therefore, because the General Plan is the overriding planning document for the City, and because the proposed Downtown Precise Plan involves amending the General Plan and Zoning Ordinance to ensure consistency, the impact would be *less than significant*.

Significance with Mitigation: Less than significant.

LU-3 Implementation of the proposed project could result in a cumulatively considerable impact to land use and planning.

The geographic context for the cumulative land use and planning impacts would occur from potential future development under the proposed project combined with impacts of development on lands adjacent to the city.

As discussed in Impact Discussions LU-1 and LU-2, the proposed project would not divide an established community or conflict with established plans, policies, and regulations. The proposed project would not conflict with any State, regional, or local land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Future development that would be allowed under the

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proposed project would not create substantial land use impacts. Development would likely continue to occur in the surrounding cities and the unincorporated areas of Marin County. However, such development would largely be taking place in already urbanized areas as infill development and would not require development or demolition that would create land use conflicts or divide established communities. Therefore, the proposed project would not result in a cumulatively considerable contribution to cumulative impacts related to land use changes, and cumulative impacts would be *less than significant*.

Significance without Mitigation: Less than significant.