



PLANNING COMMISSION AGENDA REPORT

Meeting Date: February 23, 2023

From: Julia Ayres, Senior Planner

Subject: **1000 Marina Blvd.; 2023-EX-1;** SP-CRO Sierra Point Commercial District; Grading review for Bay Trail extension involving 1,724 CY of soil cut, 222 CY of soil fill, and 1,502 CY of soil export from the subject property; and finding that this project is categorically exempt from environment review under CEQA Guidelines Sections 15301(c), 15304 (a), (b) and (c); Kyle Marrs, applicant; Bp3 Sf4 1000 Marina LLC, owner.

REQUEST: The applicant requests approval of the above-referenced permit for grading to associated with extension of the Bay Trail on the subject property, involving 1,724 cubic yards (CY) of soil cut, 222 CY of soil fill, and 1,502 CY of soil export from the subject property. Site improvements include construction of 795-ft long, 12-ft wide paved multi-use path flanked by 3-ft decomposed granite shoulders, removal of 32 mature trees and replanting of 39 trees, and parking lot reconfiguration and restriping with no net parking space loss.

RECOMMENDATION: Approve 2023-EX-1 via adoption of Resolution 2023-EX-1 containing the findings and conditions of approval.

ENVIRONMENTAL DETERMINATION: The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) per Section 15301(c), 15304(a),(b), and (c) - this project falls within classes of projects which the State has determined not to have a significant effect on the environment. The exceptions to this categorical exemption referenced in Section 15300.2 of the CEQA Guidelines do not apply.

APPLICABLE CODE SECTIONS: Brisbane Municipal Code (BMC) §17.32.220 and §15.01.110 establish requirements for the Planning Commission's review of grading permits for projects involving more than 250 CY of grading in the SP-CRO district.

ANALYSIS AND FINDINGS:

Existing Conditions and BCDC Requirements

The approximately 4.4 acre property is located at the northwest corner of Marina Boulevard and Sierra Point Parkway and its northern property line abuts 3000-3500 Marina Boulevard. Both 1000 Marina and 3000-3500 Marina Boulevard are owned by the same owner, Phase 3 Real Estate. Construction of Phase 3's three-building biotech campus at 3000-3500 Marina Boulevard is currently underway.

A significant part of 3000-3500 Marina's approved development plan (DP-1-18 and DP-1-21) includes improvement and extension of the Bay Trail from its current terminus at the western corner of 3000-3500 Marina Boulevard to the south and east along the property's southerly

perimeter, as required by the San Francisco Bay Conservation and Development Commission (BCDC) though the site does not directly abut the Bay waters. BCDC's 2019 approval of the 3000-3500 Marina Boulevard project included a condition requiring the property owner to extend the Bay Trail along the western perimeter of 1000 Marina Boulevard to complete BCDC's preferred trail alignment (see Attachment C). This project and grading review request, and subsequent building and grading permits issued by the City of Brisbane, will satisfy BCDC's permit condition.

Project Description

The proposed Bay Trail alignment is shown on Sheets C3.0 and C3.1 of the applicant's plans (Attachment E). The 795-ft long trail would be 18-ft wide, including a 12-ft paved multi-use path flanked by 3-ft decomposed granite shoulders. A 3 ft. tall wood post and rope fence would be built on the east side of the Trail between the and the developed areas of the site, while a 42 inch guardrail would be located on the west side of the northern portion of the trail. To accommodate the trail, 20 surface parking stalls would be removed and replaced elsewhere on the site, with no net loss of parking spaces.

To accommodate the parking lot reconfiguration and Bay Trail extension, the project includes a reduction in on-site landscaping from 37% of the site to 31% of the site (see landscape plans Sheet L0.10, Attachment E). This exceeds the 25% minimum landscaping requirement in the SP-CRO district regulations, and it should be noted that the Sierra Point Design Guidelines allows land devoted to public access corridors to be considered as additional landscape area (see Attachment D).

Thirty-two mature trees are proposed to be removed due to conflict with the proposed Bay Trail alignment or due to the health or condition of the tree. An arborist report prepared by HortScience/Bartlett Consulting evaluates the condition and suitability for preservation of each tree, shown on the landscape plans in Attachment E. Thirty nine replacement trees (New Zealand Christmas Trees) are proposed on the site, primarily in the southern portion of the site between the Bay Trail extension and Sierra Point Parkway, and a mix of California native, low water use shrubs and groundcovers are proposed throughout the site within the perimeter landscape buffers and parking lot.

The subject property features berms and higher elevation areas extending above the finish grade of the parking lot and adjacent roadways, consistent with the Sierra Point Design Guidelines. As such, the portions of the property where the Bay Trail extension is sited will need to be excavated to provide a level surface at grades matching Marina Boulevard and the Bay Trail segment to the north at 3000-3500 Marina Boulevard. The proposed grading includes 1,724 CY of soil cut, of which 222 CY would be redistributed on the site as fill and 1,502 CY would be off-hauled.

Finally, the City Engineer has stated that future intersection improvements currently in the planning phase at the Marina Boulevard/Sierra Point Parkway intersection may impact the finish grade and location of the terminus of the Bay Trail extension at Marina Boulevard. Due to the evolving planning and design discussions with the City Engineer which will not be resolved until other project proposals in Sierra Point move forward, staff has drafted a condition of approval for the applicant to work with the City Engineer and incorporate any modifications he may require into the grading plans submitted with the grading permit application. Adjustments would result in a minor increase in the volume of cut associated with the project, based on staff's discussions with the City Engineer.

Analysis

To approve the requested grading review and recommend that the City Engineer issue the grading permit, the Commission must make the findings in BMC Section 15.01.110 and summarized below. Detailed findings are included in Exhibit A to the draft Resolution (Attachment A). Where relevant, the below summary analysis also addresses Sierra Point Design Guidelines parameters for site landscaping.

1. Will the proposed grading be designed to reflect or fit comfortably with the site context and natural topography?

As shown in the applicant's grading plans and details, the proposed grading is designed to fit comfortably with the site context and natural topography to the extent feasible. The Bay Trail extension is located along the western and southern perimeters of the site, which feature more varied topography compared to the relatively gradual slope of the developed site area. These variations drive the location and volume cut and fill required to create a level pedestrian way and match the finished grades of trail connection points at 3000-3500 Marina Boulevard and Marina Boulevard and Sierra Point Parkway.

2. Will the proposed grading be designed to ensure that retaining walls visible to the public are designed to be as visually unobtrusive as possible?

As shown in the grading plans, few retaining walls are proposed. The tallest wall, located in the northern portion of the trail at its connection with 3000-3500 Marina Boulevard, would not exceed 4 ft in height above grade and would be located on a cut slope with very limited views from the Bay Trail. California native plantings, as shown in the landscape plans, would further screen this wall. Other walls are limited to approximately 1 ft in height above grade and would be similarly screen by California native plantings.

3. Will the proposed grading be designed to minimize removal of existing street trees, any California Bay Laurel, Coast live Oak or California Buckeye trees, or three or more mature trees of any species? Where removal of existing trees is necessary, will the landscape plans for the project include the planting of appropriate replacement trees?

An arborist report was prepared for the project and is included in the landscape plans. The report includes an inventory of the 124 trees existing on the site and evaluation of their health condition and appropriateness for protection or removal based on the project plans and health condition of the trees. As shown in the landscape plans (Sheets L0.6.00.B, L0.6.01, L0.6.02), the removal of 32 mature trees is driven by direct conflict with the Bay Trail extension, with a few identified for removal due to poor health or structural condition. No street trees or trees otherwise protected by species are proposed to be removed. More than 90 existing mature trees would remain on the site.

The landscape plans propose replanting of 39 trees on the site, primarily in the southern portion of the site to provide screening from Sierra Point Parkway and adjacent Highway 101. All 39 trees are proposed to be New Zealand Christmas Trees, a hardy, low water use evergreen species that is commonly seen in the Sierra Point neighborhood. The trees feature colorful foliage in the summer and are an attractive and appropriate species considering the challenges inherent to plant growth at Sierra Point (wind, salt, poor soils). Therefore, not only does the project preserve existing trees on-site to the maximum extent feasible, but replacement trees are proposed at a more than 1x1 ratio resulting in a net increase of trees on the site.

Finally, the Sierra Point Combined Architectural and Site Guidelines provide general guidance to include both internal parking lot landscaping and screening of surface parking lots. The landscape plans preserve existing internal parking lot landscaping wherever feasible while still allowing for replacement parking spaces to be sited appropriately. Additionally, new tree and shrub plantings are proposed adjacent to the Marina Boulevard and Sierra Point Parkway frontages to enhance screening of the existing parking lot.

ATTACHMENTS

- A. Draft Resolution **2023-EX-1**
- B. Aerial vicinity map
- C. BCDC Permit 2019.001.00 Excerpt (Special Condition II.B.9)
- D. Sierra Point Combined Architectural and Site Design Guidelines Excerpt
- E. Applicant's plans



Julia Ayres, Senior Planner



John Swiecki, Community Development Director

Draft
RESOLUTION **2023-EX-1**
A RESOLUTION OF THE PLANNING COMMISSION OF BRISBANE
CONDITIONALLY APPROVING 2023-EX-1 FOR
GRADING ASSOCIATED WITH EXTENSION OF THE BAY TRAIL
AT 1000 MARINA BOULEVARD

WHEREAS, Kyle Marrs, the applicant, applied to the City of Brisbane for approval of Planning Commission grading permit review involving 1,724 CY of soil cut and 222 CY of fill at 1000 Marina Boulevard to accommodate extension of the San Francisco Bay Trail consistent with the Bay Trail alignment planned by the San Francisco Bay Conservation and Development Commission; and

WHEREAS, on February 23, 2023, the Planning Commission conducted a public hearing on the application, publicly noticed in compliance with Brisbane Municipal Code Chapters 1.12 and 17.54, at which time any person interested in the matter was given an opportunity to be heard; and

WHEREAS, the Planning Commission reviewed and considered the staff memorandum relating to said applications, the applicant's plans and supporting materials, and the written and oral evidence presented to the Planning Commission in support of and in opposition to the application; and

WHEREAS, the Planning Commission finds that the proposed project is categorically exempt from the provisions of the California Environmental Quality Act; pursuant to Section 15301(c), 15304(a),(b), and (c) of the State CEQA Guidelines; and

WHEREAS, the Planning Commission of the City of Brisbane hereby makes the findings attached herein as Exhibit A in connection with the application.

NOW THEREFORE, based upon the findings set forth hereinabove, the Planning Commission of the City of Brisbane, at its meeting of February 23, 2023, did resolve as follows:

Grading review 2023-EX-1 is approved per the findings and conditions of approval attached herein as Exhibit A and B.

ADOPTED this twenty-third day of February, 2023, by the following vote:

AYES:
NOES:
ABSENT:

Sandip Patel
Chairperson

ATTEST:

JOHN A SWIECKI, Community Development Director

**Draft
EXHIBIT A**

Action Taken: Conditionally approve 2023-EX-1 per the staff memorandum with attachments, via adoption of Resolution **2023-EX-1**.

Findings:

1. The proposed grading is designed to fit comfortably with the site context and natural topography to the extent feasible given: 1) the maximum slopes and cross-slopes for accessible path design required for multi-use paths and Bay Trail design criteria, and 2) the finished grade of existing trail connection points at 3000-3500 Marina Boulevard and the northwestern intersection of Marina Boulevard and Sierra Point Parkway. The Bay Trail extension's location along the western and southern perimeters of the site corresponds with more steeply sloping topography compared to the relatively gradual slope changes within the developed footprint of the site, which drives the level of cut required to accommodate a level pedestrian way.
2. The proposed grading is designed to ensure that retaining walls visible to the public are designed to be as visually unobtrusive as possible. The tallest retaining wall is approximately 4 ft tall, retaining an area of fill in the northern portion of the Bay Trail extension. Due to its location on a cut slope, and location adjacent to undeveloped Caltrans right-of-way below Highway 101, this wall is not visible from off-site and has limited views from the Bay Trail itself. Proposed plantings of California native, very low water use species (blue eyed grass and California poppy) at the base of the wall would provide a certain amount of screening for any limited public views. Other walls typically do not exceed one ft in height above grade and are similarly screened by plantings of California native, very low water use plants.
3. The proposed grading is designed to minimize removal of mature trees from the site. The site currently features 124 trees, the majority of which are mature (trunk circumference exceeding 30 inches). Dominant species include Nichol's willowleafed peppermint and Lombardy poplar, with significant numbers of New Zealand Christmas Trees, some Monterey pine, and other ornamental and fruit trees. The majority of the 32 trees to be removed are Lombardy poplar and Monterey pine, and their removal is required primarily due to direct conflict with the Bay Trail extension alignment. Some trees are proposed to be removed due to poor health condition, as documented in the June 13, 2022 HortScience/Bartlett consulting arborist's findings included in the landscape plans. No California Bay Laurel, Coast Live Oak, or California buckeye trees exist on the site per the tree inventory prepared by HortScience/Bartlett. No street trees are proposed to be removed.
4. The landscape plans for the project include the planting of appropriate replacement trees. The landscape plans propose replacement planting of 39 New Zealand Christmas trees, which are appropriate to the site due to their low water needs and hardy nature, as the evergreen species can withstand and thrive in poor soils, slopes, wind, and foggy conditions.

Conditions of Approval:

Prior to issuance of a Building Permit:

1. The applicant shall provide evidence of the San Francisco Bay Conservation and Development Commission's approval of the project plans in writing to the Community Development Department.
2. The applicant shall obtain a grading permit from the City Engineer. The building permit plans shall reflect any modifications to the grading plans required by the City Engineer in his action on the grading permit related to future improvements at the Sierra Point Parkway/Marina Boulevard intersection.
3. The applicant shall provide verification from the project arborist that tree protection measures as outlined in the June 13, 2022 HortScience/Bartlett arborist report submitted with the application and included in the approved project plans on file with the Community Development Department have been installed pursuant to their recommendations.
4. The applicant shall obtain an encroachment permit from the Department of Public Works for all proposed construction activity and private improvements within the public right-of-way.
5. The property owner shall enter into a standard landscape maintenance agreement with the City.

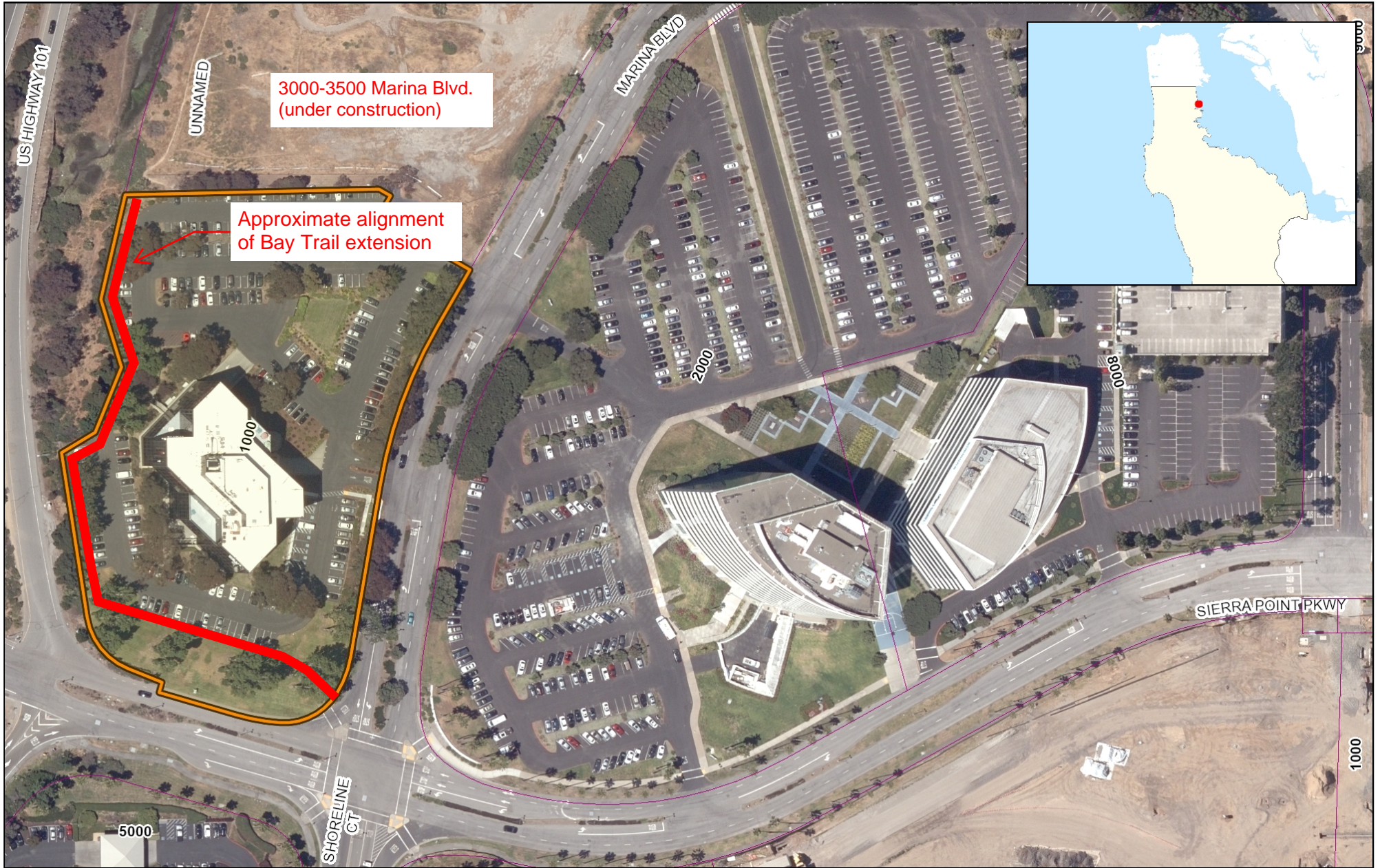
During Construction:

6. Project construction activities shall comply with all Best Management Practices related to erosion control and stormwater management as outlined in the "Flows to Bay" Best Management Practices guidelines which shall be attached to the building permit plans.
7. All removal and severe trimming activities shall comply with applicable federal and state provisions protecting nesting or migratory birds as provided in the federal Migratory Bird Treaty Act and the California Fish and Wildlife Code, Section 3503 and following, as amended.

Other Conditions:

8. Approval of this application is to allow for the project as detailed in the Project Description contained in the Planning Commission staff report dated Click or tap to enter a date., except where project parameters are modified expressly by this Resolution.
9. Material violation of any of the conditions, including material deviation from the approved project description, may be cause for revocation of this permit 2023-EX-1 and termination of all rights granted there under.

10. Minor modifications may be approved by the Community Development Director in conformance with all requirements of the Municipal Code.
11. The permittees agree to indemnify, defend and hold the City and its officers, officials, boards, commissions, employees and volunteers harmless from and against any claim, action or proceeding brought by any third party to attack, set aside, modify or annul the approval, permit or other entitlement given to the applicant, or any of the proceedings, acts, or determinations taken, done or made prior to the granting of such approval, permit, or entitlement.



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This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

THIS MAP IS NOT TO BE USED FOR NAVIGATION

- g. *Step Planter Stairway (East)*. An approximately 1,700-square-foot stairway ranging from approximately 27 to 40 feet in width, and approximately 3,960 square feet of step planters connecting to the Courtyard Level from the passenger drop-off area.

9. Bay Trail Extension at 1000 Marina Boulevard

- a. *Trail Extension*. No later than 12 months following the issuance of a temporary certificate of occupancy for any improvements authorized herein, the permittee shall provide on the 1000 Marina Boulevard parcel a minimum 12-foot-wide accessible asphalt bicycle and pedestrian path with 3-foot-wide decomposed granite shoulders (“trail extension”) along the general alignment shown on Exhibit B and labeled “Proposed Bay Trail extension in 1000 Marina Blvd.” The trail extension shall be made exclusively available to the public for unrestricted public access for walking, bicycling, and related purposes in perpetuity.
- b. *Reciprocal Easement Agreement*. Prior to applying for any necessary governmental approvals for the trail extension, the permittee shall submit to the Commission’s Executive Director, for her/his review and approval, a Reciprocal Easement Agreement (“REA”) between the permittee and the owner of the 1000 Marina Boulevard parcel that provides for the construction and ongoing maintenance of the trail extension. The REA shall run with the land and respectively burden and benefit future owners. The REA shall be countersigned or acknowledged by the Commission’s Executive Director, and will require that the modification, termination, or removal of the provisions in the REA governing the maintenance and existence of the trail extension will require approval by or on behalf of the Commission. The Executive Director will approve or disapprove of the instrument within 30 days after submittal for approval on the basis of its sufficiency to create legally enforceable rights and duties to provide the trail extension as required by Special Condition II.B.9.(a). For the avoidance of doubt, the permittee may conduct grading and site work upon the property prior to submission and execution of the REA, which shall only be required prior to construction of foundations for vertical work upon the project.
- c. *Necessary Authorization*. Prior to commencing construction on the trail extension, the permittee shall obtain any necessary approvals and authorizations by the City of Brisbane, including any additional review under the California Environmental Quality Act (CEQA) that the City deems necessary, and the Commission.
10. **Signage and Wayfinding**. Prior to construction of the public access improvements authorized herein, the permittee shall submit for review and approval by or on behalf of the Commission a comprehensive public access sign program designed to maximize public recognition, use, and enjoyment of the site’s public access improvements. The sign program shall provide detail on the location, quantity, and design of wayfinding, interpretive, “Public Shore,” and Bay Trail signs. The sign

Open Space / Landscape Matrix

Guidelines:

- I. Incorporate roadway rights-of-way, private land reserves, public access, and utility considerations into an overall open space/landscape matrix for Sierra Point.
2. Utilize the landscape matrix to provide linear and peripheral pedestrian and bicycle circulation and public access to the Bay Edge.
3. Utilize the landscape matrix to collect and carry storm water and to place other utility lines.
4. Vary width of landscape areas not only within the road rights-of-way, but also within private parcels.
5. Maintain a minimum distance of 80 feet between buildings located within 150 feet of the Bay's edge.

Parking

Guidelines:

1. Provide landscape development around the subterranean garages to visually screen as well as to establish contact between the groundplane and the building.
2. Take advantage of the maximum ratio of small car stalls to standard size car stalls.
3. Introduce planting in the on-grade lots in planting islands, massing where possible.
4. Provide parking for the disabled in accordance with State regulations.
5. Provide parking for bicycles.
6. Designate adequate parking spaces for public use within Sierra Point, at both the northern and southern public access focal points and at the northwest inner corner providing public access to Fisherman's Pier.
7. Encourage use of public parking within the Brisbane Marina.
8. Screen cars through use of planted earth helms, shrubs and walls,
9. Provide a minimum 15-foot strip of landscape along both sides of major entries as well as a median into the parking area.
10. Provide a minimum 15-foot strip of landscape along both sides of minor entries extending a minimum of 40 feet into the parking area.

Public Access and View Corridors

Guidelines:

1. Utilize a continuous 8-foot pathway throughout the site for public access, widening it to 10 feet along the Bayfront.
2. Provide connections to existing public access pathways in adjacent developments.
3. Use asphalt, modular pavers and compacted gravel for pathway materials, except as determined otherwise by the Public Works Director.
4. Provide parking for the public at key connections to the Bayfront.
5. Locate parking stalls, structures and landscaping to maintain visual access to the Bay as much as possible.
6. Align major view corridors where possible at the turning points of the primary street loop system to continue visual and physical access to the Bay from the public thoroughfare.

Guidelines:

- I. Generally, the light source should be a "cut-off" type fixture, i.e., one that reflects light downward and out, rather than upward.
2. The fixture should be in proportion to the standard to which it is attached.
3. The shape of the fixture should have simple, clean lines.
4. The fixtures should be compatible with the various styles of architecture.
5. Street lighting standards should be 30 feet in height, tapered round steel, painted black in color.
6. Light standards in parking lots should be 1630 feet in height and consistent throughout the entire Office Park. Poles should be square, painted brown or black in surface parking areas and white in parking structures,
7. Pathway lighting can vary from simple step lights, bollard lighting and pathway standards to a maximum height of 15 feet.
8. Appropriate lights such as up-lighting should be incorporated to accent planting and other landscape or architectural features without casting glare or creating a safety hazard to passing pedestrians.

G. Signage

Signage shall be consistent with the sign programs adopted by the City of Brisbane for Sierra Point.

H. Plant Materials

Following BCDC's recommendations, native plant species will be utilized from the Bayfront path to the shoreline with a transition zone from the Bayfront path to the 100-foot shoreline band boundary.

Trees:

Botanical Name	Common Name
<i>Aesculus californica</i>	California Buckeye
<i>Agonis flexuosa</i>	Peppermint Tree
<i>Alnus rhombifolia</i> Casuarina cunninghamiana	White Alder
<i>Ceratonia siliqua</i>	River She Oak
<i>Cupaniopsis anacardioides</i>	Carob Tree
<i>Eucalyptus</i> (excluding <i>camaldulensis</i> , <i>globulus</i> and <i>pulverulenta</i>)	Carrot Wood
<i>Koelreuteria paniculata</i>	N.C.N.
<i>Liquidambar styraciflua</i>	Goldenrain Tree
<i>Mains baccata</i> <i>mandschurica</i>	Sweet Gum
<i>Melaleuca atruillaris</i>	Siberian Crabapple
<i>M.elaleuca leucodendron</i>	Drooping Melaleuca
<i>Melaleuca nesophila</i>	N.C.N.
<i>Melaleuca stypheliodes</i>	Pink Melaleuca
<i>Meterosideros excelsus</i>	New Zealand Christmas Tree
<i>Nyssa sylvatica</i>	Sour Gum
<i>Pinus canariensis</i>	Canary Island Pine
<i>Pinus eldarica</i>	Mundell Pine
<i>Pinus halepensis</i>	Aleppo Pine
<i>Pinus muricata</i>	Bishop Pine
<i>Pinus pinea</i>	Italian Stone Pine
<i>Popuhig nigra</i> 'italica'	Lombardy Poplar
<i>Salix babylonica</i> <i>Ulmus</i> <i>parvifolia</i> <i>Ulmus</i> <i>parvifolia</i> <i>Ulmus</i>	Weeping Willow
<i>parvifolia</i> <i>Ulmus</i>	Chinese Elm
<i>robusta</i> <i>Washingtonia</i> <i>filifera</i>	Siberian Elm
	Mexican Fan Palm
	California Fan Palm

S h r u b s :

Botanical Name	Common Name
<i>Abelia species</i>	Abelia
<i>Agapanthus africanus</i>	Lily of the Nile
<i>Arbutus unedo</i>	Strawberry Tree
<i>Aretostaphylos species</i>	Manzanita
<i>Baccharis emmerri</i>	Broom
<i>Callistemon citrinus</i>	Lemon Bottlebrush
<i>Cassia coquiembensis</i>	Senna
<i>Cistus purpureus</i>	Orchid Rochose
<i>Dodonea viscosa</i> <i>Ipurpureat</i>	Hop Bush
<i>Escallonia °Jubilee'</i>	N.C.N.
<i>Escallonia rubra</i>	N.C.N.
<i>Griselinia littoralis</i>	N.C.N.
<i>Hakea species</i>	N.C.N.
Common Name	Hebe species
	Juniperus species
	Melaleuca species

Use of Guidelines

These Guidelines have established standards of quality for development at Sierra Point. Adherence to these standards by implementation of the treatments outlined in these Guidelines will ensure a development, which will be an asset to the City of Brisbane. A high quality environment will provide an attraction to potential tenants, making Sierra Point competitive with other developments in the area.

The Guidelines are meant to be used as a tool to ensure that Sierra Point meets the requirements of various public and private bodies involved in its development. These bodies include:

1. BCDC - which will hold the Guidelines as standards by which to judge compliance with permits and the Bay Plan.
2. City of Brisbane - which, in addition to utilizing its municipal code and other applicable regulations, will use the Guidelines as a basis for reviewing subdivision and building plans in achieving coordinated development within Sierra Point.
3. Lenders - which will use the Guidelines as a measure of quality and, therefore, marketability of the development.
4. The Developer - which will use the Guidelines to attract tenants who understand the need to contribute to a unified development increasing its level of quality.
5. The Consultants - who will use the Guidelines as a basis for implementation of specific plans ensuring a quality development.

The Design Guidelines, because they are guidelines, only set direction for an integrated and cohesive development and are not themselves regulations. However, for a successful and high quality product, it is imperative that a commitment be made by all involved not only to comply fully with all applicable regulations, but to follow the standards and treatments outlined in these Guidelines. Departure from these Guidelines should be made only after careful evaluation.