



**KEYSER MARSTON ASSOCIATES™**  
ADVISORS IN PUBLIC/PRIVATE REAL ESTATE DEVELOPMENT

**MEMORANDUM**

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**To:** City of San Diego Planning Department  
**From:** KEYSER MARSTON ASSOCIATES, INC.  
**Date:** May 8, 2019  
**Subject:** Evaluation of Potential Impacts of Collocation

**I. EVALUATION OF POTENTIAL IMPACTS OF COLLOCATION**

*A. Objective*

In addition to the market demand analysis, Keyser Marston Associates, Inc. (KMA) was tasked with providing a high-level qualitative assessment of potential impacts resulting from the introduction of residential uses (employee housing) within or adjacent to prime industrial land within the Mira Mesa and University Community Plan Areas (CPAs). As background, the City is evaluating three (3) focus areas for potential collocation – Sorrento Mesa Business District, Miramar Gateway, and the University Collocation Area. To evaluate the potential impacts of collocation in these focus areas, KMA reviewed various case studies; prepared an analysis of strengths, weaknesses, opportunities, and threats (SWOT); and identified best practices with respect to successful collocation of residential and prime industrial uses.

*B. KMA Approach*

In completing this assignment, KMA undertook the following principal work tasks:

- Reviewed four (4) case studies with respect to collocation of industrial and residential uses
- Prepared a SWOT analysis based on a review of industry literature, case studies, and interviews with stakeholders

- Identified prerequisites and potential approaches for successful collocation
- Assessed the potential for successful collocation within each focus area

### C. Collocation Case Studies

The following tables present case studies of industrial and residential mixed-use development policies and programs of four (4) cities/counties: County of San Diego, California; San José, California; Glendale, California; and Atlanta, Georgia. As shown, the cities intend to create mixed-use environments within or in close proximity to industrial uses. Each city/county has acknowledged their need to maintain, expand, and attract industrial uses – with policies that promote walkable urban environments without entirely impeding on existing industrial land use designations. A profile of each city's/county's program is presented below.

Table I-1 below presents the County of San Diego's adopted amendment to the East Otay Mesa Business Park Specific Plan, revised to include 3,158 residential units, 78,000 square feet (SF) of commercial, and approximately 765,000 SF of employment uses.

Table I-1: Case Study – County of San Diego, East Otay Mesa Business Park Specific Plan Amendment	
  	
<b>City/Region</b>	County of San Diego, California
<b>Program(s)</b>	<ul style="list-style-type: none"> <li>• Otay 250 Sunroad – East Otay Mesa Business Park Specific Plan Amendment (July 2018)</li> </ul>
<b>Goals/ Objectives</b>	<ul style="list-style-type: none"> <li>• Contribute to the Specific Plan goals of promoting a well-organized international industrial and business district to attract and accommodate forecasted growth by providing a Mixed-Use Village Core that would permit a variety of residential uses at higher densities, in addition to light industrial/technology, office, and commercial uses.</li> </ul>

Table I-1: Case Study – County of San Diego, East Otay Mesa Business Park Specific Plan Amendment	
<b>Key Policies</b>	<ul style="list-style-type: none"> <li>Specific Plan Amendment (SPA) to the East Otay Mesa Business Park Specific Plan to establish a new Mixed-Use Village Core area within the Specific Plan Area, which would allow for the construction of a mix of employment, retail and residential uses</li> </ul>
<b>Strengths/ Opportunities</b>	<ul style="list-style-type: none"> <li>Introduction of initial infrastructure and public facilities to the area</li> <li>Attraction of retail, food service, and other amenities</li> <li>May supply more quality of life amenities to the area</li> </ul>
<b>Weaknesses/ Challenges</b>	<ul style="list-style-type: none"> <li>May generate negative effects due to potential land use conflicts (e.g., noise, traffic, hazardous materials, pollution) that may arise between future residents and owners/operators of heavy industrial/tech businesses and manufacturing facilities</li> <li>May negatively impact the marketing and branding identity of the business park</li> </ul>
<b>Stakeholder Comments</b>	<ul style="list-style-type: none"> <li><i>“Gone are the days where we had green field development like Mira Mesa, Peñasquitos, Rancho Bernardo when you could build thousands of homes because you had all raw land. Now people have got to go in and carve it out to make sure that they fit in the community and I think they try very hard to do that.”</i> <ul style="list-style-type: none"> <li>Jerry Sanders, President and CEO of the San Diego Regional Chamber of Commerce. Sanders said the region needs more housing to support an expanding workforce in a healthy economy.</li> </ul> </li> </ul>

Table I-2 below presents the City of San José’s North Area Development Policy, which encourages the attraction of 80,000 high-quality jobs and the development of up to 32,000 new residential units. In 2017, there were approximately 8,000 units built in North San José.

Table I-2: Case Study – City of San José, North San José Area Development Policy	
	
<b>City/Region</b>	City of San José, California
<b>Program(s)</b>	<ul style="list-style-type: none"> <li>North San José Area Development Policy (1988, Updated 2005, Amended 2017)</li> <li>North San José Neighborhoods Plan (2008)</li> <li>Proposed Mega Village (2019)</li> </ul>

**Table I-2: Case Study – City of San José, North San José Area Development Policy**

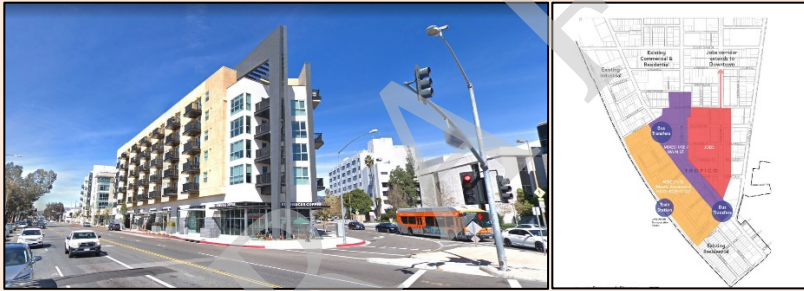
<b>Goals/ Objectives</b>	<ul style="list-style-type: none"> <li>• <u>North San José Area Development Policy</u> – development of the area as an important employment center and desirable location for high-tech corporations. This policy's goals are as follows: <ul style="list-style-type: none"> <li>○ <i>Promote economic activity</i> – create up to 80,000 new jobs</li> <li>○ <i>Promote livability</i> – add new housing and retail in close proximity to new jobs, amenities, and transit infrastructure</li> <li>○ <i>Promote long-term vitality</i> – establish infrastructure/new development funding</li> </ul> </li> <li>• <u>North San José Neighborhoods Plan</u> – advance the City's vision for North San José as an international center for innovation, a key employment area, and an excellent place where work, home, and community are fully integrated</li> </ul>
<b>Key Policies</b>	<ul style="list-style-type: none"> <li>• <u>Transit/Employment Residential Overlay (TERO)</u> – allows for expansion of supporting residential and commercial uses to promote livability <ul style="list-style-type: none"> <li>○ Provides for the development of up to 32,000 new residential units</li> <li>○ Intended to provide housing in close proximity to jobs</li> </ul> </li> <li>• <u>Core Area</u> – reserves nearly 60% of industrial development capacity for new projects. Supports commercial uses and restricted provisions for residential uses</li> </ul>
<b>Strengths/ Opportunities</b>	<ul style="list-style-type: none"> <li>• Provides employee housing in close proximity to employers</li> <li>• Encourages the use of existing and planned transit infrastructure</li> <li>• Creates desirability for high-quality employers</li> <li>• Provides services/amenities needed for new employees and residents</li> </ul>
<b>Weaknesses/ Challenges</b>	<ul style="list-style-type: none"> <li>• Requires residential development be managed or reserved for use by industrial property owners</li> <li>• Existing street grid is composed of superblocks and does not encourage pedestrian activity</li> <li>• Underutilized, wide thoroughfares</li> </ul>
<b>Stakeholder Comments</b>	<ul style="list-style-type: none"> <li>• <i>"The conversion of industrial land to residential use is in conflict with the City's goal of promoting the North San José Policy area as an important employment center for the City. Conversion of industrial land to residential use diminishes the opportunity for new residential development and can lead to incompatibility issues with regards to land use. The Policy, however, recognizes that the conversion of some industrial land to residential use within the Policy area is acceptable in order to reduce the impact upon regional traffic conditions caused by additional industrial development."</i> <ul style="list-style-type: none"> <li>- North San José Area Development Policy, Land Use Policies</li> </ul> </li> <li>• <i>"There's so much opportunity to accommodate new growth in areas like this and put together all the pieces that make a complete community."</i></li> </ul>

**Table I-2: Case Study – City of San José, North San José Area Development Policy**

	<ul style="list-style-type: none"> <li>- Michele Beasley, representative of the San Francisco planning group Greenbelt Alliance</li> <li>• <i>“The plan allows for nearly 27 million SF of office, research and development, and retail space, within close proximity to 32,000 new housing units. Ideally this will allow people to live, shop, and play near where they work, making transit or walking preferable to driving.”</i></li> <li>- Dennis Korabiak, Program Manager at former San Jose Redevelopment Agency</li> </ul>
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Table I-3 presents the City of Glendale’s Industrial/Commercial-Residential Mixed-Use designation (IMU-R), which encourages a mix of commercial, industrial, and residential uses.

**Table I-3: Case Study – City of Glendale, Industrial/Commercial-Residential Mixed-Use (IMU-R)**

		
<b>City/Region</b>	City of Glendale, California	
<b>Program(s)</b>	<ul style="list-style-type: none"> <li>• Industrial/Commercial-Residential Mixed-Use (IMU-R)</li> <li>• Tropico Center Plan</li> <li>• Rezone of 10 properties adjacent to Tropico Center Plan from Industrial to IMU-R</li> <li>• Griffith Apartments by Mill Creek (220 units in close proximity to employment)</li> </ul>	
<b>Goals/ Objectives</b>	<ul style="list-style-type: none"> <li>• IMU-R is applied to areas appropriate for a mix of commercial, industrial, and residential activities and provides for a full range of goods and services to the community which is located along portions of industrial/commercial thoroughfares</li> <li>• Encourage more intensified development of industrial areas</li> <li>• Provide for an expanded industrial base by providing areas for compatible industries to relocate to the City</li> <li>• Provide for a variety of residential opportunities in the City through zoning of sufficient land with a range of densities</li> </ul>	



<b>Key Policies</b>	<ul style="list-style-type: none"> <li>• Permitted uses (permitted, conditional, or administrative) include accessory buildings, structures, and uses; institutional uses; recreation; manufacturing and processing; residential; mixed-use; retail trade; service; and office</li> <li>• 35 to 100 dwelling units per acre, depending on adjacent zoning</li> <li>• 3 and 6 stories, depending on adjacent zoning</li> <li>• Landscaping for a minimum of 10% lot area</li> <li>• 15 feet to 25 feet minimum setback requirement, depending on adjacent zoning</li> </ul>
<b>Strengths/ Opportunities</b>	<ul style="list-style-type: none"> <li>• Allows for a full range of goods and services near large employment centers</li> <li>• Maintains the City's strong industrial base by providing compatibility between uses</li> <li>• Promotes pedestrian- and transit-oriented activity</li> <li>• Permits heavy and light manufacturing, soundstages, research and development, offices, auto repair, building supplies sales, and wholesaling</li> </ul>
<b>Weaknesses/ Challenges</b>	<ul style="list-style-type: none"> <li>• Amendments of existing industrial require Council approval</li> <li>• Does not permit the following industrial uses: incidental outdoor storage, recycling operations, emergency shelters, and non-emergency heliports</li> </ul>
<b>Stakeholder Comments</b>	<ul style="list-style-type: none"> <li>• <i>"Whether our residents work in Glendale or make the seven-mile trip to downtown L.A., this is an ideal spot. Link that with the walkability of the neighborhood and all the nearby attractions, and it's easy to understand why this is becoming such a desirable area to live, work and play."</i> <ul style="list-style-type: none"> <li>- Michael Genthe, Managing Director at Mill Creek Residential</li> </ul> </li> <li>• <i>"Our residents will have a multitude of options, whether their desire is to stay within the neighborhood or commute to the key employment centers and entertainment districts across the metro area. With our prime location and top-of-the-line amenity package, we believe The Griffith will offer an unmatched living experience in the area."</i> <ul style="list-style-type: none"> <li>- Samuel Simone, Senior Managing Director at Mill Creek Residential</li> </ul> </li> </ul>

Table I-4 below presents the City of Atlanta’s proposed Industrial Mixed-Use District (I-MIX) land use designation, which permits a mix of industrial and non-industrial uses.


Table I-4: Case Study – City of Atlanta, Industrial Mixed-Use District	
	
<b>City/Region</b>	City of Atlanta, Georgia
<b>Program(s)</b>	<ul style="list-style-type: none"> <li>Industrial Mixed-Use District (I-MIX) (Proposed July 2018, ongoing discussion)</li> </ul>
<b>Goals/ Objectives</b>	<ul style="list-style-type: none"> <li>Permit a mix of industrial and non-industrial uses in areas previously used for industrial, high-density commercial, or office institutional purposes</li> <li>Planned development to become the City’s quality of life districts created to accommodate residential and non-residential growth without losing land zoned for industrial uses</li> <li>Target “New Economy” clean industrial uses – including design standards that support compatibility of mixed and adjacent uses</li> </ul>
<b>Key Policies</b>	<ul style="list-style-type: none"> <li>At least 30% of the total floor area on a site shall be used for industrial uses</li> <li>Any floor area that is not used for industrial uses may be used for either exclusively residential uses, or exclusively non-residential uses, or any combination of the two</li> <li>Areas not otherwise defined as floor area by this district, such as parking or exterior spaces, shall not be counted towards this requirement</li> <li>Large blocks with freeway access, transitioning to smaller blocks for other uses</li> <li>Retail/showrooms fronting on major pedestrian streets</li> <li>Focus on businesses that benefit from proximity to urban resources</li> <li>Include key stakeholders in drafting of legal covenants to reduce conflicts</li> <li>Apply tools such as deed restrictions, community land trusts, and inclusionary zoning</li> </ul>

Table I-4: Case Study – City of Atlanta, Industrial Mixed-Use District	
<b>Strengths/ Opportunities</b>	<ul style="list-style-type: none"> <li>• Discourages the loss of industrial-zoned property</li> <li>• Supports compatibility of industrial and non-industrial uses</li> <li>• Attracts “New Economy” clean industrial uses such as microbreweries, wineries, distribution centers, manufacturing, and wholesaling</li> </ul>
<b>Weaknesses/ Challenges</b>	<ul style="list-style-type: none"> <li>• Promotes low-intensity industrial uses</li> <li>• Requires stakeholder outreach and participation</li> </ul>
<b>Stakeholder Comments</b>	<ul style="list-style-type: none"> <li>• <i>“Recommendations to develop a Mixed-Use Industrial District that will allow for industrial, commercial and residential uses to provide dense industrial and mixed-use new development targeting “New Economy” clean industrial uses.”</i> <ul style="list-style-type: none"> <li>- Legislation to create I-MIX zoning (July 2018)</li> </ul> </li> <li>• <i>“The intent of an I-MIX district is to accommodate residential and non-residential growth without losing land zoned for industrial uses in the process; and to ensure that industrial and non-industrial uses in the same development are planned in a unified manner.”</i> <ul style="list-style-type: none"> <li>- I-MIX Ordinance (August 2018)</li> </ul> </li> </ul>



*D. Collocation SWOT Analysis*

Based on review of industry literature and the case studies, KMA prepared a SWOT analysis with respect to collocating industrial and mixed-use residential uses within the Mira Mesa and University CPAs. Table I-5 below presents the KMA SWOT analysis.

<b>Table I-5: Collocation SWOT Analysis</b>	
<b><i>Strengths</i></b>	<b><i>Weaknesses</i></b>
<ul style="list-style-type: none"> <li>• Mix of heavy and light industrial uses</li> <li>• Close proximity to freeway</li> <li>• Existing presence of high-quality employment</li> <li>• Planned mixed-use development in close proximity</li> <li>• Existing Transit Priority Area (TPA)</li> <li>• Adjacency to existing residential amenities, including retail, parks, and schools</li> <li>• Actively involved business community</li> </ul>	<ul style="list-style-type: none"> <li>• Presence of heavy industrial uses</li> <li>• Auto-oriented community (includes heavy presence of cars and trucks)</li> <li>• Existing superblock street grids and wide thoroughfares</li> </ul>
<b><i>Opportunities</i></b>	<b><i>Threats</i></b>
<ul style="list-style-type: none"> <li>• Provide employee housing in close proximity to high-quality employers</li> <li>• Encourage the use of planned transit infrastructure</li> <li>• Attract younger employees who seek all-inclusive live/work/play environment</li> <li>• Include key stakeholders in drafting of legal covenants, deed restrictions, and related documents to reduce future land use conflicts</li> </ul>	<ul style="list-style-type: none"> <li>• Potential land use conflicts (e.g., noise, traffic, hazardous materials, pollution)</li> <li>• Can be viewed as a threat to heavy industrial uses</li> <li>• Potential loss of land supply for prime industrial uses (i.e., as land is converted to multi-family or mixed-use)</li> <li>• Introduction of new residents can bring to light existing and new land use conflicts</li> </ul>

*E. Collocation Best Practices*

Based on a review of case studies, planning articles, and outreach to office and industrial real estate brokers, KMA compiled a set of best practices with respect to planning for, and implementing, collocation of industrial and mixed-use residential development. The table below presents prerequisites and potential approaches for implementing successful collocation.

<b>Table I-6: Prerequisites and Potential Approaches for Successful Collocation</b>	
<b><i>Prerequisites for Successful Collocation</i></b>	<ul style="list-style-type: none"> <li>• Existing/growing industrial base sectors</li> <li>• Presence of underdeveloped properties</li> <li>• Strong concentration of light/clean industrial uses</li> <li>• Presence of public transit facilities</li> <li>• Close proximity to residential, neighborhood goods and services, high quality school districts, and leisure/lifestyle amenities</li> <li>• Regional need for housing units</li> </ul>
<b><i>Potential Approaches to Implementing Collocation</i></b>	<ul style="list-style-type: none"> <li>• Identify strong and weak concentrations of industrial land – allow weak concentrations to become a zoning buffer and transitional areas where appropriate</li> <li>• Identify small blocks and/or large block candidates for consolidation for potential mixed-use/pedestrian-oriented urban opportunities</li> <li>• Identify sub-areas for each use – mixed-use villages, exclusively multi-family, and exclusively prime industrial – within each area being considered for collocation</li> <li>• Determine, where appropriate, multi-family only developments are allowed versus mixed-use (which requires retail and multi-family)</li> <li>• Market to, and attract, light industrial users that will benefit from close proximity to urban resources.</li> <li>• Create a target percent of industrial to maintain when introducing new development to an existing development parcel</li> <li>• Encourage interaction (such as drafting collaborative easements, legal covenants, deed restrictions, community land trusts, and inclusionary zoning policies) between existing users and potential developers</li> </ul>

*F. Potential for Collocation by Focus Area*

The City is considering three (3) focus areas for collocation within the Mira Mesa and University CPAs – the Miramar Gateway, Sorrento Mesa Business District, and University Collocation Areas. With respect to the above prerequisites, KMA determined factors for successful collocation as presented in Table I-7 below.

	<b><i>Miramar Gateway</i></b>	<b><i>Sorrento Mesa Business District</i></b>	<b><i>University Collocation Area</i></b>
Less than 60% of the land area is designated as prime industrial	Yes	No	Yes
Existing presence of non-prime Industrial uses	Yes	Yes	Somewhat
Close proximity to existing or planned transit	Somewhat	Yes	Somewhat
Potential for small blocks to encourage walkability	Yes	Somewhat	Somewhat
Close proximity to good schools	Yes	Yes	Yes
Close proximity to open space	No	Yes	Yes
Close proximity to amenities/CPA retail core	Yes	Yes	Yes
Potential to capture employee housing demand	Somewhat	Yes	Yes

A brief description of KMA's evaluation is presented below.

- ***Miramar Gateway:*** Approximately 51% of the focus area is designated as Prime Industrial land. The focus area also contains non-prime industrial users such as breweries, public storage, and retail/restaurant. A small portion of the area, the northeast quadrant, is within a Transit Priority Area (TPA). There are existing small blocks, primarily on the east, that would encourage a mixed-use walkable district. Due to the new planned Stone Creek development, the focus area will have access to future open space. The focus area has some potential to capture employee housing demand based on the close proximity to community amenities and MCAS-Miramar.

- *Sorrento Mesa Business District:* Approximately 82% of the area is designated as Prime Industrial land. The area contains high quality employment users in high-tech, life science, and light industrial users such as breweries, and retail/restaurant. A majority of the area is within a TPA. There are some smaller blocks, primarily on the east, and a mix of resident supporting amenities on the west that would encourage a mixed-use walkable district. The focus area benefits from open space on the north. The focus area has some potential to capture employee housing demand based on the area's existing employers and proximity to new community amenities in development.
- *University Collocation Area:* Approximately 55% of the area is designated as Prime Industrial land. The area maintains strong prime industrial/high quality employment users in finance, biotechnology, and pharmaceutical industries. The northwest and southeast corners are within a TPA. The area is dominated by large blocks that would likely need to be consolidated to create a mixed-use walkable district. The focus area benefits from open space at the center and the surrounding areas. The focus area has strong potential to capture employee housing based on the area's existing employers and proximity to community amenities along La Jolla Village Drive.

Based on the above evaluation, KMA assessed the market support/land use compatibility for multi-family and/or mixed-use in each focus area in the near-, mid-, and long-term. As shown in Table I-8 below, KMA projects moderate potential for each focus area in the near-term. The Sorrento Mesa Business District and University Collocation Area focus areas are expected to advance to strong potential in the mid-term, primarily due to their strong employment base sectors and proximity to open space, transit, and retail amenities.

Despite the focus area's current encroachment of non-prime industrial uses, the Miramar Gateway focus area is projected to remain moderate in the mid-term and achieve strong potential for collocation in the long-term. The Miramar Gateway focus area can benefit from attracting and retaining high-quality employment in order to generate additional need for employee housing in the long-term.

Across the three focus areas, KMA recommends a range of employee housing types:

- On the low end, a three-story townhome/rowhome product and/or up to a five-story Type V wrap product.
- Conversely, on the high end, KMA recommends a five- to seven-story Type V or III over podium product.

- KMA believes, in some cases, Type I mid-rise/high-rise may be applicable, primarily in the University Collocation Area.

<b>Table I-8: Market Support/Land Use Compatibility for Multi-Family and/or Mixed-Use by Focus Area</b>			
	<b><i>Near-Term (0 to 5 years)</i></b>	<b><i>Mid-Term (5 to 10 years)</i></b>	<b><i>Long-Term (10+ years)</i></b>
<b>Miramar Gateway</b>	Moderate	Moderate	Strong
<b>Sorrento Mesa Business District</b>	Moderate	Strong	Strong
<b>University Collocation Area</b>	Moderate	Strong	Strong

## II. MATERIALS REFERENCED

1. *Otay 250 – Sunroad East Otay Mesa Business Park Specific Plan Amendment, County of San Diego* – [https://www.sandiegocounty.gov/content/sdc/pds/Current\\_Projects/Otay-250-Sunroad.html](https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects/Otay-250-Sunroad.html)
2. *Supervisors Approve Zoning Changes to Spur More Housing Development, County of San Diego* - <https://www.kusi.com/supervisors-approve-zoning-changes-to-spur-more-housing-development/>
3. *North San José Area Development Policy, City of San José*  
<http://www.sanjoseca.gov/DocumentCenter/View/43619>
4. *North San José Area Development Policy – Neighborhood Plan, City of San José* -  
<http://www.sanjoseca.gov/DocumentCenter/View/2778>
5. *Developer eyes huge project with thousands of homes, 1.5 million square feet of commercial space in North San José, City of José* -  
<https://www.bizjournals.com/sanjose/news/2018/03/26/north-san-jose-development-seely-ave-siliconsage.html>
6. *Residential Mixed-Use Opportunities, City of Glendale* -  
<https://www.glendaleca.gov/government/departments/community-development/planning-division/services/residential-mixed-use-opportunities>
7. *Mill Creek Breaks Ground on The Griffith Apartments in Glendale, City of Glendale* -  
<https://millcreekplaces.com/2016/01/mill-creek-breaks-ground-on-the-griffith-apartments-in-glendale/>
8. *Tropico Center Plan, City of Glendale* -  
<https://www.glendaleca.gov/home/showdocument?id=42074>
9. *Create New Zoning Chapter 16A Entitled “I-MIX” Industrial Mixed-Use District, City of Atlanta* - <http://npuv.org/wp-content/uploads/2018/08/Z-18-83-IMIX-Fact-Sheet.pdf>
10. *Putting Atlanta Back to Work: Integrating Light Industry Into Mixed-Use Development, City of Atlanta* - <http://stip.gatech.edu/wp-content/uploads/2012/10/STIP-Dan-Cotter.pdf>
11. *Putting Urban Housing into a Transforming Industrial Area* -  
<https://urbanland.uli.org/industry-sectors/mixed-use/putting-urban-housing-transforming-industrial-area/>
12. *Can traditional zoned commercial/industrial areas coexist with mixed-use and Chapter 40B projects?* - <http://nerej.com/can-traditional-zoned-commercial-industrial-areas-coexist-with-mixed-use-and-chapter-40b-projects>
13. *Zoning Buffers: Solution or Panacea?* -  
<https://www.planning.org/pas/reports/report133.htm>



### III. LIMITING CONDITIONS

1. The analysis contained in this document is based, in part, on data from secondary sources such as state and local government, planning agencies, real estate brokers, and other third parties. While KMA believes that these sources are reliable, we cannot guarantee their accuracy.
2. The analysis assumes that neither the local nor national economy will experience a major recession. If an unforeseen change occurs in the economy, the conclusions contained herein may no longer be valid.
3. The findings are based on economic rather than political considerations. Therefore, they should be construed neither as a representation nor opinion that government approvals for development can be secured.
4. Market feasibility is not equivalent to financial feasibility; other factors apart from the level of demand for a land use are of crucial importance in determining feasibility. These factors include the cost of acquiring sites, relocation burdens, traffic impacts, remediation of toxics (if any), and mitigation measures required through the approval process.
5. Development opportunities are assumed to be achievable during the specified time frame. A change in development schedule requires that the conclusions contained herein be reviewed for validity.
6. The analysis, opinions, recommendations and conclusions of this document are KMA's informed judgment based on market and economic conditions as of the date of this report. Due to the volatility of market conditions and complex dynamics influencing the economic conditions of the building and development industry, conclusions and recommended actions contained herein should not be relied upon as sole input for final business decisions regarding current and future development and planning.