

[Note that comments have been attributed to individuals in this draft for sake of review and discussion at the public OSEC meeting. They, and any other notes in red text, will be removed in the final submission document.]

Open Space and Ecology Committee – All Comments as of 1 p.m. 10/16/2025

Chapter/Section: Chapter 00 - Vision & Executive Summary

Becker

General Comments:

- Why does Figure 1 (and numerous figures afterwards in this and other chapters) in the April 2025 BSP “(w/redline)” say “Revise to reflect the updated Specific Plan Boundary?” This text implies that this figure is not up to date and that the boundaries are changing. I assume all these updates will be made available to the public prior to the City approving the Specific Plan. Further, for the few of us that will read this document numerous times, I recommend that the draft date be included on the first page of every chapter or in the header/footer of each page.

Specific Comments:

Walker

General Comments:

- Strong articulation of design and sustainability principles. Would benefit from more explicit prioritization of climate resilience, GHG accountability, and environmental justice as foundational goals.
- The summary should more clearly outline mechanisms for accountability and public oversight — especially around phasing, environmental performance, and public benefits delivery.

Specific Comments:

Section 0.4.4 – Sustainability in All Forms

This section presents an aspirational vision but lacks clarity around how sustainability goals will be measured, enforced, or reported. Recommend explicitly requiring public-facing GHG metrics, embodied carbon benchmarks, and clear LEED/zero-carbon building standards.

Section 0.4.7 – De-Emphasizing Vehicles and Parking

Appreciate the emphasis on pedestrian and transit-oriented design. However, parking strategies (especially in low-density zones like Icehouse Hill) may undermine TDM goals. Suggest parking

minimums be replaced with maximums, especially near transit nodes, and include TDM performance triggers for future buildout phases.

Section 0.5 – Community Design Structure

The narrative and maps should clarify which districts or uses are slated for early vs. late-stage development. Phasing implications are critical to understanding when and where GHG emissions, traffic, and infrastructure burdens will manifest. Recommend inclusion of a development timeline visualization in the Executive Summary.

Salmon

General Comments:

- In the General Plan Amendment No. GP-1-18 for The Baylands, Northeast Bayshore and Beatty Subareas voted on with the passing of Measure JJ, there are several provisions that do not seem to be fully addressed by the Baylands Specific Plan.
- Under Chapter 5: Land Use Section 3. “Development within the Baylands Subarea shall be subject to the City’s approval of a single specific plan for the entirety of the Baylands Subarea and a development agreement that is consistent with General Plan policies, incorporate all applicable EIR mitigation measures, and is consistent with the following standards...” which goes on in detail.
- The original EIR was a Program EIR and many remediations were somewhat non-specific because the “specifics” were to be addressed in detail in the Specific Plan EIR. Also, numerous data gaps in the original EIR were to be addressed, as well.
- We spent many months reviewing the Draft Environmental Impact Review for the Baylands Specific Plan and the final EIR has not yet been approved. Approving this Baylands Specific Plan before the Specific Plan EIR has been approved seems to be putting the cart before the horse. This Specific Plan does not address issues, omissions and data gaps raised in the Specific Plan DEIR and that is extremely concerning.
- Also under Chapter 5 Section 3 of the GP Amendment No. GP-1-18, I would just like to remind us all about certain provisions: C. All Residential development shall be designed and remediated to accommodate ground level residential uses and ground level residential-supportive uses such as daycare, parks, schools, playgrounds, and medical facilities. H. Key habitat areas, including Icehouse Hill and Brisbane Lagoon and adjacent habitat as identified in the 2001 City Open Space Master Plan shall be preserved, enhanced and protected. And K. Prior to the issuance of a grading permit to export soil or move soil from the existing landfill area for incorporation in a remediation or grading plan, the soil shall be tested in a manner approved by the City.

Specific Comments:

- 0.2 Background: As acreage of the site in the current 2025 Specific Plan has been changed from 641.8 acres in the 2023 version to 680.1 acres, that the mandatory minimum 25% minimum open space/open area will be adjusted accordingly and maps will all be updated.
- 0.3 Planning Process: This section mentions the 2019 Home for All and the City of Brisbane sponsored series of community workshops and how these workshops “yielded valuable community input and direction, which is now the foundation of this Specific Plan.” How many Brisbane citizens actually attended these workshops? Was there any vetting of participants, such as having studied any of the inherent problems of the development site? I attended those workshops and I felt it was a “free-for-all stick your colored dots where ever you want...” That does not seem like a good basis for the foundation of a Specific Plan of this magnitude and complexity especially, considering the extremely toxic nature of the site.
- In reviewing this Specific Plan, it mentions the possibility of a school in the vicinity of Main Street perhaps within blocks B6, B9, or B10 or C2. Look at the map. This is close to the Roundhouse – a site that already will require massive remediation. In reviewing the Specific Plan Draft Environmental Impact Report, I would not consider this a safe area. Many sources of contamination were *overlooked or omitted* in the DEIR – specifically Lazzari Fuel Company (Operational from 1963 until destroyed by fire in 2024), Stauffer Chemical, the hide and glue plant (called the Boneyard and generated horrible smells up until the 1960’s), other long-term tenants on Industrial Way, plus Midway Village, located across Bayshore Boulevard along Main Street in Daly City, CA and do not forget a century of lead deposition along major transportation corridors, like adjacent Bayshore Boulevard, from decades of exhaust from leaded gasoline. Also, there is increasing evidence of the dangers of diesel exhaust. Children and young adults are most susceptible to lead and environmental poisoning. How can we approve a Specific Plan when these deep environmental concerns still need to be addressed?
- 0.5.1 Existing Conditions is exactly that, and does not take into account the “changed conditions” that will exist once remediation is complete. For example, the current site on the western side of the railroad tracks is relatively flat with the exception of Ice House Hill. Once a layer of 30 feet of “clean fill” is put in place in areas with the Roundhouse will be reconstructed, it will no longer be flat. This will change pedestrian mobility and bicycle ease of access, it will change storm runoff, viewsheds and many other aspects. I really do not think that this dramatically changing topography was adequately addressed in the Specific Plan.
- 0.5.5 West Side Mixed Use: South of Geneva “Along the tracks, high-rise towers site atop parking structures to afford views of the Bay and San Bruno Mountain.” What happened this? “All Residential development shall be designed and remediated to accommodate ground level residential uses and ground level residential-supportive uses.”

Chapter/Section: Chapter 1 - Introduction

Becker

General Comments:

Specific Comments:

- P36 – The text in the following subbullet appears here and again on page 46. It's not clear what this means. The upper range of dwelling units is defined by Measure JJ. Why does the State density bonus for affordable units have anything to do with it? Does the statement imply that 2200 is not the maximum number of units allowed, because more can be added if the Developer chooses to put in more affordable housing?
 - *A range of 1800-2200 dwelling units (the upper range of which shall not exceed all units permitted under the State density bonus or other law providing for affordable housing)...*
- P37-38 references a Development Agreement that must be passed by the City. We have not been able to find that online. Can the status for that document be updated? Since this document includes the enforcement provisions, we think OSEC should be given the opportunity to review the document.
- P37 – The table needs to be updated to reflect the status of the RAPs for OU-SM, OU-2 and the Landfill Closure Plan. It still refers to the plans for approval of the drafts to be granted in 2021/2022.
- P40 (letter H) - The planned enhancement of Icehouse Hill will endanger the existing habitat. That area should remain undisturbed, except for invasives removal and any necessary remediation (i.e. the shooting range). The plan to turn it into a park with trails is unnecessary and will be additional expense to the Developer. Use Visitacion Creek and Lagoon Park to satisfy the need to develop more nature escapes but protect the Icehouse Hill habitat by keeping humans away. The General Plan requirements will be met by protecting Icehouse Hill as undisturbed habitat.
- P40 (letter K) - The Compliance summary listed does not satisfy the General Plan Provisions, specifically that “the soil shall be tested in a manner approved by the city.” There is a local story about a shipment of dirt from Hunter’s Point that had limited records and potential radioactivity. Any soil transported to the residential area needs to be tested in order to calm the concerns of current and future residents. Whether the rumor is true or not, the only way to be sure is to test the soil. Radiation detection equipment exists for mounting on haul trucks, which would minimize the resident’s concerns without impacting the timing of the development project.
- P52-53 – Building heights of 270 ft for Multifamily High, 260 ft for Transit Oriented Development, and 240 ft for Hospitality (all with additional uncounted heights for solar and trellises) are TOO HIGH for fill in the bay. First, its seismically scary (even if the building survives an earthquake, there will be stampedes in the stairwells like during 911). Second, the pile driving noise will be a severe nuisance for decades, given the number of tall buildings planned. Taller buildings require deeper piles.

Walker

General Comments:

Specific Comments:

Salmon

General Comments:

Specific Comments:

- 1.2.1 Historical Background: Mischaracterization of the site is an issue. “After the landfill operation stopped in 1967, a cover of soil was been placed over the landfill material, meeting the closure requirements at the time. Except for more recent activities related to soil recycling, industrial, fleet parking, retail and filling operations, the area remains largely unchanged since the landfill closure in the late 1960s.”

Well, this is certainly not correct. Southern Pacific's operations in Brisbane ceased in phases, with the Bayshore Yard closing for freight in the 1980s and the track removal completed around 2005. Stauffer Chemical's operations in Brisbane, CA ceased in 1982, when the polyvinyl chloride (PVC) manufacturing plant they operated was deactivated. Lazzari Fuel company began operations in 1963 and continued until it was destroyed by fire in 2024. The Kinder Morgan Tank Farm, a full pipeline system serving the Bay Area, including Brisbane and the Bayshore Yard, was completed in 1969 by Southern Pacific, at which point a separate subsidiary company, Southern Pacific Pipe Lines, Inc., was operating the system. Interim businesses that operated on the Baylands included Champion Speedway, a ½ mile oval track built in 1963 by Jim McClellan who later added a 1/8 mile drag strip on the speedways straightaway. This NHRA-sanctioned facility was the mainstay of the Bay Area auto racing scene until its closure in 1979.

- 1.2.2 Site Existing Conditions: Mischaracterization of existing conditions continues to be an issue.

Paragraph 2: “Since the landfill’s closure in 1967, the area has been used as a repository for fill materials from construction sites in the region and for recycling of sand, dirt, gravel, and other construction materials. Over time, these activities, which are authorized under a permit from the City of Brisbane, have resulted in variable topography, with elevations that are on average 40 to 50 feet above the surrounding grades.” This is not exactly correct. The soils stockpile operations exceeded the height limitation on the permits by over 25 feet and had to move and remove quite a bit of dirt.

Paragraph 4: “The ongoing movement of fill material into and recycled materials out from The Baylands has generally prevented the establishment of any significant vegetation.” This is

unfortunately not true. Almost the entire site from Bayshore to the Bay, including the piles of dirt, is now infested with *Cortaderia jubata*, also known as jubata grass and pink pampas grass, a highly invasive, non-native grass that is difficult to eradicate and is listed on Cal-IPC (California Invasive Plant Council) invasives list as well as Brisbane's list. This is a significant issue as the seeds are spread far and wide by the wind and the soil is now contaminated not only plants but with seeds and will continue to spread.

Chapter/Section: Chapter 2 - Land Use Program & Definitions

Becker

General Comments:

Specific Comments:

- Table 2.2 – The table footnote (on pgs 54-56) says that similar uses to what is in the table are also authorized. This is a loophole. We recommend that any unlisted uses instead be considered conditional.
- Table 2.2, Page 54 – Day Care should not be permitted as a Ground Floor Use on the heavily polluted land that was the railyard maintenance site until/unless there are many years of monitoring (in both wet and dry years) that proves the VOCs and other pollutants are not a concern. Children are more sensitive than adults and should be protected until it's proven that those areas are safe. Therefore, we recommend this be Conditional.
- Table 2.2, Page 55 – We're curious why Hardware Stores are not allowed in the Amenities Area, given that Convenience Stores, Food & Beverage Stores, and Retail Sales are allowed.
- Table 2.2, Page 56 – What is Accessory Use and how is it different than the other items below it. This seems like a loophole. Additionally, what Accessory Uses would be allowed in the Open Space Area?
- Table 2.2, Page 56 – Commercial EV Charging Stations are great but shouldn't be in open space area because they are paved parking spaces. Or if they are allowed because they're replacing non-EV-Charging parking spaces, they shouldn't count towards the Open Area requirement.
- Table 2.2, Page 56 – Why are Communications facilities allowed in the Sustainability Infrastructure Area?
- Table 2.2, Page 56 – The transmission towers should be conditional in the Sustainability Infrastructure Area, not Permitted. Their height impacts their surroundings, the EMI impacts their surroundings, and they have impacts on migrating birds. Their placement must be scrutinized prior to permitting.
- Table 2.2, Page 56 – Why is the Sewer Lift Station allowed in the Open Space Area?
- Page 56-E – The DEIR stated that Golden State Lumber will no longer receive lumber shipments by rail. This will greatly impact their cost of goods and therefore threaten their business. Further, shipping lumber by truck is heavy and inefficient and will increase the GHG emissions. Is the DEIR correct? We encourage you to consider how to maintain their ability to receive shipments by rail.

- Page 57-H – The “Conflicts with Other Laws” paragraph only exists in the Kinder Morgan Tank Farm subsection. Is it out of place? It seems like it should apply to the whole chapter.

Walker

General Comments:

- Detailed land use definitions and site program. Commend the effort to blend residential, commercial, and sustainability-focused zones.
- Greater clarity needed on adaptive reuse requirements, equity in housing distribution, and open space governance.
- Recommend land use definitions and allocations be updated to explicitly identify and limit fossil-fuel-reliant uses, embedding flexibility for emerging clean technologies, and codifying the city’s 66% by 2030 and 2040 net-zero climate targets into the plan’s development criteria as these timelines overlap significantly
- Various rules around non-conforming structures are mentioned at multiple points. Recommend that these concepts are revisited in a way that explicitly decouples requirements around offending structures so as not to hinder the ability to build or integrate renewable infrastructure like solar and battery storage, or add or service EV charging infrastructure, etc. in an ongoing way. Hypothetical examples: it should never be the case that installing needed EV chargers is blocked by or made unreasonably expensive by secondary requirements like curb dimensions or similar feature that functionally has nothing to do with EV charging.

Specific Comments:

Section 2.2.2 – Preservation of Natural Resources

Strong intent to protect habitat areas like Icehouse Hill and Brisbane Lagoon. Recommend including performance targets and habitat health metrics, updated regularly, and public transparency on stewardship and funding responsibilities (City vs. developer vs. HOA/management company etc).

Section 2.2.3 – Infrastructure & Services

Critical to define ownership, operations, and maintenance responsibilities — particularly for energy storage systems, stormwater systems, and habitat corridors. Recommend a backup plan in the event of private entity failure (e.g. bankrupt developer vs. HOA/management company etc).

Section 2.3 – Land Use Program Table & Maps

Helpful overview of use distribution. Suggest including expected population and GHG emissions impact estimates by district to inform analysis of cumulative environmental burdens and transit needs.

Section 2.5 – Allowable Uses Table

Table may permit low-impact or non-performance-based TDM strategies (e.g., passive amenities) that dilute overall climate performance. Recommend a weighted impact scoring system or prioritization of high-leverage TDM interventions.

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 3 - Development Standards & Controls

Becker

General Comments:

- This chapter has glaring examples of how the Open Space calculation is biased towards the developer.
 - On pages 90, 102, 113, 122, and 134, it says “A minimum of 50% of the podium setback shall be landscaped; the surface area occupied by built-in planters or other permanent landscape features shall be included in this calculation.” Really? Planters are hardly Open Space, even according to the Measure JJ definition.
 - It appears that the parks and greenways shown in Figures 3.7, 3.9, etc is called open space. While it may be a nice walking path, it’s not ecologically relevant to Brisbane and the San Bruno Mountain habitat. This is the problem with the measure JJ definition of open space. There’s nothing the BSP needs to do about it, but it feels like false advertising to call it open space when it more of a Parks and Recreation–type paved bicycle and walking path.
 - The following italicized text from P74 implies that an open-air theater, cafe, and museum are counted as open space, which is inappropriate: *“The footprint area of the Roundhouse shall be included in the 25% Open Space requirement. This restoration includes an open-air theater with flexible seating and stage, community space, a railroad museum, a café, and other community-oriented uses.”*
- The BSP authors do not seem to be aware of the Brisbane’s Invasives Regulation (which is different than the Landscape Ordinance referenced on P90, 102, 113, 122, 134, 151, and 160) and of the need to focus on planting non-invasive landscaping. While the promise for

conserving water in landscaping is a great first step, more must be done to protect the local habitat.

- It's not until page 167 that the text in the following subbullet appears, which is interestingly in the description of Hospitality Area. All areas should be held to this standard or go further by focusing on drought-tolerant plants from San Bruno Mountain or at least the Bay Area.
 - *"Where landscaping is provided, at least 75% native California or drought tolerant plant or tree species shall be used (Refer to Section A4.106.3 Landscape Design)."*
- There are several mentions of "ground-mounted up-lights for trees" (p 144, 151, 159, 167, 176 and likely more that we missed). This is not compliant with Brisbane's Dark Skies Ordinance. Lights need to be directed downwards. We recommend double checking Section 3.8 to confirm compliance with Brisbane's Dark Skies Ordinance. At least two bullets are not.

Specific Comments:

- P72 – Roughly how many 270' tall buildings are planned? Any how many 260' tall buildings? It's not clear from this section or anywhere else in the BSP.
- P76 – It's alarming that half of the allowed parking for the entire project is in the Icehouse Hill district. If this will be a tech-campus or an education-campus, there needs to be transit shuttles. Why are we encouraging people to drive to the area that is not near a main thoroughfare, such as Geneva Ave or 101. According to the DEIR, Bayshore Boulevard will be reduced to one-lane, so additional parking for the campus Mid/Low does not seem to benefit the project. This is concerning because it opens that area up for mass retail, similar to Serramonte and Daly City. Presumably, there will be some parking for the community ball fields, but hopefully there will also be a shuttle stop near there.
- P80 – Having 15 parking spaces max to accommodate the solar farm, battery storage, water storage, WRF, Lagoon Park, Baylands Preserve Park and the Brisbane Lagoon seems insufficient.

Walker

General Comments:

Specific Comments:

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 4 - Sustainability Framework

Becker

General Comments:

Specific Comments:

Specific Comments:

- P182 - #6 in table – It's great to see focus on water conservation, but when talking about landscaping, we need to consider native plants, not just drought tolerant plants.
- P183 – Section 4.3.1 - Does the 7.5 lbs/sqft of waste include the Landfill Closure waste?
- P184 – We're curious why the Multi-family Mid building type has the lowest allotment of parking per residential unit. It seems like the Multi-family High and Multi-family Low are similar in needs for parking, or that the Multi-family Low many need a little more because it's farther from Caltrain.
- P184 – We're curious why Campus Mid and Campus Low need so much more parking than the other commercial. If this is a tech-campus or an education-campus, there will be transit shuttles. Why are we encouraging people to drive to the area that is not near a main thoroughfare, such as Geneva Ave or 101. According to the DEIR, Bayshore Boulevard will be reduced to one-lane, so additional parking for the campus Mid/Low does not seem to benefit the project. Let's encourage more shuttles!
- P187 #2 – The DEIR implied that the WRF non-potable water would be used in SSF, rather than in Brisbane. Please address this inconsistency between the BSP and the DEIR.
- P 187 #5 – It's great to see the Development Standard of using locally adaptive native species! We've noticed a big inconsistency throughout the BSP wrt low-water landscaping versus natives (for example P182 #6; Section 4.8.1; P90; 102; 113; 122; 134; 151; and 160). The latter is highly preferred, because the plants are adapted to our climate cycles, are noninvasive and have a symbiotic relationship with the species of concern in our area.
- P188 – Section 4.8.1 - We're very concerned that native plants are not mentioned at all in this section. There's more to landscaping than being drought tolerant.

Walker

General Comments:

- **Lack of Concrete Commitments**
While the chapter gestures at climate goals, it fails to clearly articulate enforceable requirements. Phrases like “carbon neutral” are used without defining mechanisms, timelines, or mandates—raising concerns that these goals could be achieved via offsets

or intensity reductions rather than actual phaseout of fossil fuel usage and infrastructure.

- **Misalignment with Brisbane Climate Goals**

The plan references California’s 2045 targets but does not anchor its timelines to Brisbane’s more aggressive 2040 net-zero goal or the 66% emissions reduction by 2030. This is a critical oversight that undercuts the City’s climate leadership and should be addressed explicitly.

- **Strong Commitment to All-Electric Buildings Undermined by Diesel Generator Loophole**

The plan makes a commendable and critical commitment to all-electric infrastructure, explicitly prohibits new natural gas infrastructure in residential and commercial buildings. This is a major step in the right direction and aligns with Brisbane’s climate goals. However, this progress is severely undercut by the lack of a phase out plan for existing natural gas infrastructure and the continued allowance of diesel backup generators in buildings. Given the availability of clean, reliable alternatives—including significant and already planned solar + battery storage—there is no justification for embedding any fossil fuel combustion into a development billed as “sustainable” and “all electric.” Allowing any diesel and natural gas undermines both the spirit and substance of the all-electric commitment and contradicts the emissions reduction goals laid out elsewhere in the plan. This loophole should be closed, and diesel generators should be explicitly prohibited.

Specific Comments:

- **4-2 Zero Carbon Buildings:** A Master Property Owners’ Association is mentioned in the context of *Section 4.3 Zero Waste* as having a role in outlining management of waste disposal, etc. Recommend they also play a role in providing clear information and access to solar and storage systems onsite to buyers and/or tenants. Solar and battery systems often benefit from access to monitoring dashboards and the like and may require some minimal maintenance and participation in associated virtual power plants or other load shifting programs that require an associated account and direct control of the assets. Who can monitor, control and profit from these systems via virtual power plant or other grid participation programs, etc. should be clearly established. And information about participation as well as relinquishing control at the end of ownership or a rental agreement, as well as hand-offs to new tenants etc., should be made easy, clear, public, and readily available.
- **4-4 Sustainable Transport:**
The focus on trip reduction in this section is important and well-placed, but it should be paired with an equally strong and explicit commitment to eliminating fossil fuel use in transportation. Trip reduction alone will not achieve our climate goals if the remaining trips continue to rely on internal combustion engines. Given the long timeline of this development—stretching to 2043 or beyond—this plan must assume and actively support a near-total transition to zero-emission vehicles.

Specifically:

- All new transportation infrastructure (including the proposed shuttle system) should be fully electric or zero-emissions from the outset. “Efficiency” is no longer a sufficient benchmark—only zero-emission transport should ultimately be considered “sustainable.”
- EV charging infrastructure should be proactively scaled to meet the realistic and growing demand by the time the development is completed. Planning for today’s EV share is not sufficient—this system must be future-ready.
- The plan should also explicitly prohibit the use of fossil fuels (gasoline, diesel, propane, etc.) in any new fleet vehicles or supporting infrastructure.

This section is an opportunity to lead—not just in reducing trips (which in an all or even mostly EV world have a much less straightforward relationship to emissions) but in ending fossil fuel reliance altogether. The plan should state that clearly.

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 5 - Conservation and Open Space

Becker

General Comments:

Specific Comments:

Walker

General Comments:

Specific Comments:

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 6 - Circulation

Becker

General Comments:

Specific Comments:

Walker

General Comments:

Specific Comments:

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 7 - Infrastructure

Becker

General Comments:

Specific Comments:

Walker

General Comments:

- **Commendation on All-Electric Commitment (w/ Caveat)**
The plan explicitly states that no new natural gas infrastructure will be installed, which is a major and commendable milestone. However, this progress risks being undermined by ongoing support of existing natural gas infrastructure and continued reliance on diesel generators for backup power, both of which are inherently incompatible with the project's sustainability framing and long-term resilience. A truly future-proofed plan should prioritize battery storage, microgrids, solar, and other non-emitting forms of backup power exclusively from the outset.
- **Plan for Future Load Growth, Including EV Charging**
The infrastructure planning must take into account that this development will reach full buildout around 2043, by which time internal combustion engine vehicles will be rapidly declining and likely eliminated from the fleet mix sometime in the first decade or two of operation. All infrastructure—especially related to electrical distribution—must be

scaled accordingly, with future-proofing for near-universal EV charging in residential, commercial, and transit-supportive settings. Waiting until later phases to address these needs will be too late and result in costly retrofits.

- **Wastewater and Reuse Planning Could Be More Ambitious**

While minimal stormwater treatment and water reuse are mentioned, the intent appears to be to simply allow it to run off into Visitacion Creek and the Brisbane Lagoon. There's an opportunity to go further: greywater reuse, aggressive stormwater harvesting, and decentralized water recycling systems could be better incorporated. These measures would align well with the region's long-term drought planning and the Bay Area's leadership on water resilience.

- **Specific Electricity & Microgrid Opportunities Must Be Better Defined**

While the plan includes admirable high-level goals around electrification and grid resilience, the lack of specificity in this section undercuts its potential impact. Many of the most promising opportunities—such as on-site solar, battery storage, microgrids, and VPP participation—are acknowledged only in vague terms or deferred to future study or unspecified third-party operators. This leaves open the real possibility that none of these initiatives will ever actually be implemented, especially if not required. We recognize that some flexibility is necessary at this stage, but this document is called the Specific Plan for a reason. If we want to see these ambitious ideas realized, the plan must include stronger direction and clearer expectations, including concrete steps to ensure that distributed energy resources and grid-interactive infrastructure are integrated into the core development process, not left as optional or secondary add-ons.

This is not just a technical concern—it goes to the heart of the development's identity. The plan's core environmental claims of being “all-electric” and “net zero” are entirely contingent on how it generates and uses renewable energy on-site. If too much flexibility is retained, and no firm commitments are made, it becomes far too easy for these claims to be quietly abandoned if market conditions change. We must ensure that what's currently aspirational becomes binding.

Specific Comments:

- **7.2.1**

The explicit acknowledgment of sea-level rise underscores the need to ensure that adaptation and resilience planning are **real and funded**. There is mention of for example the potential of a ‘100 year flood’ level as a kind of baseline – we need to go above and beyond that. With the climate warming faster than expected, 100 year floods have become the norm, and not the exception – in July 2025 we had at least three of these events in a one week period across the country. Viewing these events through the lens of this old framing is practically laughable – these events don't happen every 100 years anymore – this is just our new reality. Let's call the climate risks what they are and do our best to build to meet or exceed our new reality. When – not if – ‘100 year flood’ levels are exceeded in the Baylands, will any cleanup and rebuild be fully funded?

- **7.4.4**

“Baylands Water Recycling Facility provides recycled water for irrigation, cooling and commercial building uses (toilet flushing, etc.), thus stormwater reuse may be, but is not presently, anticipated” Why not? This seems like a waste. Why not codify minimum retention or reuse targets (e.g., capture first 1” of rainfall onsite), rather than deferring to future design guidelines?

- **7.5.4:**

Replace Backup Generators with Battery Storage

Section 7.5.4 notes that backup generators will be provided to support the energy demands of the water supply system – and backup diesel generators are noted at multiple points in the EIR as well in connection to other facilities throughout the development. Especially given that the Baylands completion target is currently 2043, this approach is misaligned with the project’s stated sustainability goals and out of step with the City’s 2040 and the State’s 2045 net zero targets.

Given the project’s extensive on-site solar generation and the rapidly evolving energy landscape, battery storage is a more appropriate and future-proof solution. Batteries not only provide reliable backup power in an emergency without local emissions or ongoing fuel costs, but also enable new lucrative revenue streams through grid participation, time-of-use optimization, and potential participation in virtual power plant (VPP) programs—all benefits that diesel or gas generators simply cannot offer.

Recommendation: Eliminate combustion-based backup generators from the plan completely and prioritize battery storage systems sized appropriately for critical water infrastructure and other emergency loads.

- **7.9: Natural Gas:**

The commitment to exclude new natural gas infrastructure in the Baylands development is an important and commendable step toward alignment with Brisbane’s climate goals. However, the plan’s proposal to leave existing gas infrastructure untouched raises two major concerns:

1. **No Phase-Out Strategy:** If the City aims to achieve net-zero emissions by 2040, continued service to legacy parcels via natural gas — even if technically “outside” the new development — undermines that objective. A phase-out strategy or transition timeline for existing users should be identified.
2. **Stranded Asset and Safety Risks:** Maintaining aging natural gas pipelines amid a large-scale redevelopment creates potential for stranded or forgotten infrastructure and future safety hazards, especially if disturbed during nearby construction. This risk should be proactively addressed through decommissioning planning, rerouting, or enhanced maintenance protocols.

Recommendation: The Specific Plan should not just throw in the towel, but at least include some mention of a pathway for responsibly decommissioning or transitioning existing gas infrastructure within the Baylands footprint to ensure long-term safety and alignment with City-wide decarbonization goals.

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 8 - Public Facilities Financing

Becker

General Comments:

- This chapter tries to make the case that the Baylands development will not cause a fiscal burden on the City, but it left out critical public services. Who pays for the additional police, fire, libraries? Both in terms of manpower and also for infrastructure that needs to be in place when the residences are built.

Specific Comments:

- P 451 – Reference #5 refers to the 2015 FEIR, but should be updates to the new EIR, once approved.
- P 451 – The paragraph prior to section 8.3.1 says that funds to improve Icehouse Hill will require funding from third parties or grants. In a previous section, it said this would be at the Developers expense. Either way, Icehouse Hill shouldn't become a trail network. It should be protected and undisturbed (except for periodic invasives removal and shooting range remediation).
- P456 – Section 8.3.6 discussed Transportation funds for clean air. We see the hotels as an opportunity. In a typical scenario, travelers from SFO could rent a car, take taxi/uber/lyft, or take a shuttle to their hotel. Few will opt for Caltrain because it does not have an airport stop. The problem with hotel shuttles is that they run back and forth, sometimes empty. If multiple hotels at the Baylands could share a shuttle, it might be more efficient for both the hotels and guests, as well as have the added benefit of lower GHG emissions for the project.

Walker

General Comments:

Specific Comments:

Salmon

General Comments:

Specific Comments:

Chapter/Section: Chapter 9 - Implementation

Becker

General Comments:

Specific Comments:

- P459 – In the end of the first column of text on this page, it states “*For both East and West, remediation and landfill closure require ongoing monitoring and maintenance, which will allow ground floor occupancy for sensitive uses such as residences.*” What is the required timeline for this monitoring? The DEIR suggests it is 30 years with the ability to be waived to one year, which we find unacceptable. Children will be living in these homes and therefore the monitoring must last through many climate cycles and sea level rise before determining that the remediation was thorough enough that no hazards remain.
- P461 – in the text between the tables for Phase I and Phase II, it states that “*Completion Prior to Issuance of a Certificate of Occupancy for any Commercial Development exceeding 4,000,000 Square Feet...*” Does this include development on the east side of the Baylands?
- P461 in the last row of the Phase II table, it says “*Bay Trail and Visitacion Creek: Must be completed before the approval of any building permit exceeding 1.25 million square feet. Baylands Preserve and Lagoon Park: Must be completed before the approval of any building permit exceeding 2 million square feet.*” Does this include development on the west side of the Baylands?
- P462 – The DEIR mentioned the use of a conveyor belt for moving dirt from the east side to the west side. This is a fantastic idea (if protected from wind), because it greatly reduced GHG emission and traffic congestion. But the conveyor is not mentioned in the BSP. #3 at the end of p462 says that approval of the BSP is effectively approval from the planning commission. How is the conveyor included in this permission?
- P464 - #7 mentions the process for seeking variances. Will these be publicly noticed?
- P464 Section 9.3.3 mentions CC&Rs. Will there be real estate disclosures for residences built on the former rail maintenance yard? This needs to be required.
- P465 – The final paragraph seems out of place. Was it copied from Ch 3?

Walker

General Comments:

1. **Need for Performance-Linked Triggers:** The phasing language should include clear sustainability and emissions milestones—not just infrastructure completion—as conditions for advancing to subsequent phases. These could include EV adoption thresholds, GHG tracking reports, transit ridership minimums, and renewable energy deployment. This aligns with CEQA mitigation principles and ensures that the city’s 66% emissions reduction by 2030 and net zero by 2040 targets remain central to implementation.
2. **Enforceability and Monitoring Clarity:** The plan references an “Implementation Program” and interagency cooperation but does not clarify who is responsible, how compliance will be monitored, or what mechanisms are in place if the developer fails to meet its obligations. This needs to be strengthened. There should be regular reporting requirements and enforcement tools tied to climate and sustainability performance—not just infrastructure delivery.
3. **No Fossil Fuel Backsliding:** The Implementation Chapter must clearly prohibit any attempt to revisit fossil fuel infrastructure additions (e.g., diesel generators, LNG storage, new gas service connections) at later phases of implementation. This should be explicitly codified and enforced through the development agreement and municipal code where necessary.
4. **Public Transparency:** Implementation oversight should include a mechanism for public transparency and community review, especially on sustainability KPIs (e.g., quarterly or annual GHG performance, VMT data, transit adoption, and electrification rates).

Specific Comments:

Salmon

General Comments:

Specific Comments: