



City of Brisbane

Open Space and Ecology Committee

Special Meeting Agenda

Wednesday, June 17, 2026 at 6:30 PM • Hybrid Meeting • 50 Park Place, Brisbane, CA

The public may observe/participate in Committee meetings using remote public comment options or by attending in person. Committee Members shall attend in person unless remote participation is permitted by law. The Committee may take action on any item listed in the agenda.

To Address the Committee

In Person:

Location: 50 Park Place, Brisbane, CA 94005, Community Meeting Room

Masks are no longer required but are highly recommended in accordance with California Department of Health Guidelines. To maintain public health and safety, please do not attend in person if you are experiencing symptoms associated with COVID-19 or respiratory illness.

Remote Participation:

Members of the public may observe/participate in the Committee Meeting by logging onto the Zoom Webinar listed below. Please be advised that if there are technological difficulties, the meeting will nevertheless continue.

The agenda materials may be viewed online at brisbaneca.org at least 24 hours prior to a Special Meeting, and at least 72 hours prior to a Regular Meeting. Archived videos can be replayed on the City's website, brisbaneca.org/meetings.

Remote Public Comments:

Remote meeting participants may address the Committee members via the Zoom Webinar or Call In Number. Meeting participants are encouraged to submit public comments in writing in advance of the meeting to aetherton@brisbaneca.org. Emails will not be monitored during the meeting.

Join Zoom Webinar: zoom.us (please use the latest version: zoom.us/download)
brisbaneca.org/osec-zoom

Webinar ID: 976 4295 0160

Call In Number: 1 (669) 900-9128

Note: Callers dial *9 to "raise hand" and dial *6 to mute/unmute.

Special Assistance:

If you need special assistance to participate in this meeting, please contact Adrienne Etherton at aetherton@brisbaneca.org or (415) 215-8259. Notification in advance of the meeting will enable the City to make reasonable arrangements to ensure accessibility to this meeting.

Call to Order

Roll Call

- A. Consider any request of a committee member to attend the meeting remotely under the “Emergency Circumstances” of AB 2449

Adoption of the Agenda**Announcements****Oral Communications****Approval of the Minutes**

- B. Minutes of May 27, 2026

New Business

- C. Baylands Final Environmental Impact Report (FEIR) and Specific Plan Comments and Discussion

Staff Updates**Subcommittee Reports & Reorganization****Calendar Items****Chair and Committee Member Matters****Next Meeting**

- D. July 22, 2026

Adjournment



CITY of BRISBANE

Open Space and Ecology Committee Meeting Minutes

Wednesday, March 27, 2026 at 6:30 P.M. • Hybrid Meeting 50 Park Place, Brisbane, CA

CALL TO ORDER – 6:31 PM

ROLL CALL

Consider any request of a committee member to attend the meeting remotely under the “Emergency Circumstances” of AB 2449

Committee members present: Atapattu, Carney, Rogers, Salmon, Walker. Nunan was absent. Becker attended remotely under provisions of AB 2449.

Staff members present: Sustainability Manager, Etherton; Sustainability Fellow, De La Cruz. Management Analyst Brown attended remotely.

ADOPTION OF THE AGENDA

Salmon moved to adopt the agenda and Rogers seconded; the motion was adopted unanimously.

ORAL COMMUNICATIONS – Etherton noted the release of the Baylands FEIR and mentioned there is no formal comment period moving forward, although the committee members may make comments as members of the public until Council presentation. The committee may choose to make comments as a body after forming an ad hoc subcommittee, and present their comments as a group. Workshops for FIER and Specific Plan will be May 28 and June 11, and are intended to be informational sessions. Comments will be addressed June 25 at the Planning Commission Hearing, with a final Council hearing set in the Fall, date TBD.

APPROVAL OF THE MINUTES

- A. Minutes of April 22, 2026 – Salmon moved to adopt the agenda and Rogers seconded. Atapattu, Becker, and Carney abstained. The motion was otherwise adopted unanimously.

NEW BUSINESS

- B. Presentation from Jordan Bow of Renew SF Bay
- Jordan Bow presented a shoreline restoration proposal focused on solutions for shoreline resilience, habitat restoration, and sea level rise adaptation in Brisbane
 - City staff clarified that the Marina Garden project involved in the proposal does not require Council approval, although the total restoration project may require additional review and approval of both Staff and Council
 - Committee approved the formation of an OSEC ad hoc subcommittee to coordinate future shoreline restoration proposals; the Marina Garden

restoration project; and additional potential habitat restoration events, with approval from Council to add to Workplan

- Salmon moved and Carney seconded. The motion was approved unanimously
 - Liasons to meet with Council for addition to Workplan
- C. Appoint a Representative for the Beautification Subcommittee
- Salmon nominated Rogers and Rogers accepted. Salmon moved and Atapattu seconded- the motion was adopted unanimously
- D. Summer Habitat Restoration Day
- Staff suggested Owl Canyon as the location recommended by San Bruno Mountain Watch, with July 18 date
 - Quarry Road suggested by Committee with Committee members Rogers and Salmon to follow up with related parties and availability
 - Staff to follow-up with final date and location
- E. Budget and Project Updates
- Etherton presented current Sustainability budget, with no action items

STAFF UPDATES

- Etherton updated Committee on Council approval of recommended tree canopy goal of 23% by 2040. Next step is to schedule and Tree Subcommittee meeting with Staff including Public Works and GIS manager Bob Sage
- Pool Electrification ribbon cutting is scheduled for June 9 at 2:30 PM
- Staff met with PG&E regarding the Corporation Yard EV charging project with funding from PG&E and Peninsula Clean Energy
 - Etherton informed Committee that infrastructure is intended for Public Works fleet charging only (not public use) with a total goal of approximately 7–9 Public Works electric vehicles by 2030.
- The Committee was informed that the City is participating in county-led pilot program to streamline heat pump water heater permitting with coordination from Community Development Department and county staff. Updates to be provided.
- Etherton informed Committee that the City submitted interest in participating in the SB 1221 Priority Neighborhood Decarbonization Zones pilot program that would replace gas pipeline upgrades with neighborhood-scale electrification projects. Updates to be provided.
- David Schooley Monument Subcommittee met May 20. They continue advancing plans near Buckeye Canyon. Staff will work on cost estimates and the final placement to be unveiled July 28

SUBCOMMITTEE REPORTS AND REORGANIZATION

- Events (Becker, Salmon) – none
- Education and Outreach (**Rogers**, Walker) – upcoming meeting date to be scheduled for July library display and additional outreach
- Climate Action Planning (Atapattu, Walker) – Becker removed
- Open Space Plan update (Nunan, Rogers, **Salmon**) – none
- *Crocker Trail Frog Habitat (Nunan, **Rogers**) – Salmon removed

- Tree Subcommittee Meeting (Carney, Rogers, **Salmon**) – Carney added. Meeting to be scheduled
- Liaisons (Rogers, **Walker**) – none
- PCA Grant (**Becker**, Salmon) – none
- Dark Skies – none
- Invasive Species (Carney) – Carney added.
- Sierra Point Park Planning (Rogers) – none
- Baylands FEIR/SP Comments (Becker, Carney, **Walker**) – Newly formed ad hoc subcommittee. Staff to distribute: prior chapter assignments, relevant page references, and response-to-comment sections
- Shoreline Restoration (Carney, Nunan, Salmon) – Newly formed ad hoc subcommittee

CALENDAR ITEMS – Habitat Restoration Day, as discussed. Upcoming Compost Giveaway Day June 2. Acres vegetation management presentation postponed to July due to Baylands workload.

CHAIR AND COMMITTEE MEMBER MATTERS – none

NEXT MEETING: June 17, 2026

ADJOURN – 8:47 PM

[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.]

Baylands FEIR

Chapter/Section: Chapter 3 – Project Description

Carney

General Comments:

- The Project Description does not state estimated tree removal and proposed replacement at a minimum 1:1 ratio. This should be quantified to show adherence to Brisbane Municipal Code Requirements regarding tree removal and replacement. This should be addressed in the Project Description for clarity.

Specific Comments:

- ES 4.2/ES-10 & 3-138 – A recent revisions was made to the approvals and permits required from responsible and trustee agencies “Water supply permit amendment from the State Water Resources Control Board, Division of Drinking Water **Santa Clara District.**” The project site is located within the San Francisco District for the Regional Water Quality Control Board. Please verify that the “Santa Clara District” referenced in the most recent revision remains accurate based on the location of the proposed project site and associated Regional Board jurisdiction.
- ES 4.2/ES-11 – Amongst the listed approvals for the proposed project, including obtaining relevant permits from the CDFW and USACE, the FEIR states that a 1602 SAA and Section 404 permit are required. However, the list of anticipated discretionary actions and approvals lists the need for a Waste Discharge Requirement (WDR) from the RWQCB, and does not include a Section 401 permit issued by the RWQCB, often paired with a Section 404 permit issued by the USACE (not a WDR)w. Should a 404 permit be anticipated, a 401 permit from the RWQCB should be required/referenced in this list.
- 3.3/3-33 – The following revision could conflict with water quality standards set forth by the RWQCB. “Lagoon Park improvements would follow completion of Title 27 landfill closure activities, which would remove existing vegetation for placement of **an impermeable a low-permeability** landfill cap over the existing refuse layer along with landfill gas and leachate control systems (see Section 2.5.3, Title 27 Final Landfill Closure, for a description of Title 27 landfill closure requirements).” Although stormwater treatment and bioretention areas are proposed, the revised “low permeability” allows potential discharge that may seep into project stormwater runoff, resulting in lower water quality in adjacent aquatic features (i.e., lagoon, wetlands, creek, etc.).

Chapter/Section: 4.6 Biological Resources

Carney

General Comments:

- **All CEQA-related comments in the DEIR have been incorporated into Section 4.6.**
- The baseline conditions of the project site are based on studies dating back to 2023. Although appropriately timed and included four subsequent years of surveys between 2019 through 2023, baseline biological conditions may have changed. Some biological surveys (i.e., jurisdictional delineations) may no longer remain valid, as baseline conditions may change in the span of three years. A biological survey is recommended to confirm existing biological conditions on-site prior to development of the proposed project. Should additional sensitive biological resources be detected on-site, in addition to those identified in the previous FEIR, be avoided and mitigated, as appropriate per CEQA guidelines.

Specific Comments:

- Section 4.6/4.6-62 – The FEIR contains additional mitigation language regarding burrowing owl habitat assessments, focused surveys, and pre-construction surveys for the species. As a part of the proposed burrowing owl avoidance measure, it is recommended the mitigation measure include the preparation and CDFW approval of a project-specific Burrowing Owl Mitigation Plan, outlining consultation efforts and plans to avoid and relocate potential burrowing owl within the project site, if detected during the recommended focused surveys.

Chapter/Section: 4.11 Energy Resources

General Comments:

Walker

- OSEC requests additional clarification regarding the City’s interpretation of Measure JJ’s Energy Neutral requirement. Measure JJ states that “Baylands development shall be designed so as to be energy neutral on an ongoing basis.” At the same time, Measure JJ requires that “Baylands development shall be revenue positive to the City.” Both provisions were adopted by Brisbane voters using similarly mandatory language. However, throughout project review, the Revenue Positive requirement appears to be treated as a binding performance constraint, while the Energy Neutral requirement is interpreted more flexibly.
- OSEC recognizes that the City possesses discretion in implementing and interpreting voter-adopted policies. The issue is not whether the City had discretion. The issue is how that discretion was exercised when two voter-adopted requirements came into tension. The FEIR would benefit from a clearer explanation of how the City reconciled these competing objectives and why one was treated as a binding constraint while the other was interpreted more flexibly.

Specific Comments:

- The FEIR should more clearly explain how the proposed project satisfies, or is deemed consistent with, Measure JJ’s requirement that Baylands be “energy neutral on an ongoing basis.” The FEIR acknowledges that on-site renewable generation would provide only a portion of projected electrical demand, yet concludes that the project remains consistent with Measure JJ. If the City’s position is that procurement of renewable electricity through

utility programs satisfies this requirement, the FEIR should explicitly describe that interpretation and explain how it aligns with the intent of the voter-adopted measure.

- OSEC further notes that Energy Neutrality was not merely an operational objective but a design requirement. Measure JJ does not state that Baylands should attempt to be energy neutral if convenient or economically favorable. Rather, it states that the development “shall be designed so as to be energy neutral on an ongoing basis.” It is therefore reasonable to ask whether alternative development approaches, land use mixes, building programs, or on-site energy strategies were considered that would have more fully achieved this objective. The FEIR does not clearly explain why Energy Neutrality was treated as a constraint to be interpreted around rather than a design criterion to be achieved.

Chapter/Section: 4.13 Hazards and Hazardous Materials

Walker

General Comments:

- OSEC recognizes that site remediation and landfill closure activities are subject to extensive regulatory oversight. However, several aspects of the proposed remediation strategy rely upon long-term engineering controls, land-use restrictions, maintenance requirements, and institutional controls that may remain in place for decades. OSEC recommends additional clarification regarding how these requirements will be communicated, monitored, enforced, and periodically reviewed over the life of the project.
- The FEIR provides substantial information regarding remediation design and regulatory approvals but provides less detail regarding long-term stewardship. OSEC encourages the City to identify clear mechanisms for ensuring future property owners, tenants, businesses, and residents remain aware of applicable land-use restrictions, maintenance obligations, and environmental controls necessary to protect public health and safety.

Chapter/Section: 4.14 Hydrology and Water Quality

Walker

General Comments:

- OSEC supports the inclusion of sea-level-rise adaptation measures and resilience-oriented design standards throughout the Specific Plan. However, it is important to recognize that all sea-level-rise projections are ultimately forecasts based on the best available science at a given moment in time. Recent years have demonstrated that climate science continues to evolve rapidly as new observations become available and previously unprecedented climate impacts occur with increasing frequency. While the FEIR appropriately relies on current scientific guidance, it should also acknowledge the substantial uncertainty inherent in projecting conditions many decades into the future.
- Because future conditions may differ materially from today’s projections, long-term resilience depends not only on designing for current estimates but also on maintaining the flexibility, governance structures, monitoring programs, and funding mechanisms

necessary to adapt as new information emerges. A resilient system is not one that assumes today's projections are correct. It is one that remains effective even when those projections prove incomplete.

Specific Comments:

- Response M-OSEC-85 references flood-protection standards and adaptive design features but does not directly address OSEC's concern regarding long-term implementation, monitoring, governance, and funding. Given projections of approximately 83 inches of sea level rise by 2100, OSEC recommends additional clarification regarding how adaptation measures will be funded, maintained, monitored, and updated if future conditions differ from current projections.
- OSEC further notes that sea-level rise is fundamentally linked to anthropogenic climate change. Adaptation and mitigation should therefore be viewed as complementary rather than independent strategies. While adaptation measures are necessary to address future flooding and shoreline impacts, long-term resilience ultimately depends upon both preparing for climate impacts and reducing the greenhouse gas emissions that drive those impacts. Decisions regarding emissions and adaptation should therefore be understood as interconnected components of a broader climate resilience strategy. Focusing exclusively on adaptation without maintaining accountability for emissions risks treating symptoms while neglecting the underlying driver of the problem.

Chapter/Section: 4.18 Parks, Open Space & Recreation

Carney

General Comments:

- All CEQA-related comments in the DEIR have been incorporated into Section 4.18

Specific Comments:

- Section 4.18.5/4.18-22 – The threshold criteria for Impact REC-2 focuses more on Physical Deterioration of Candlestick Point Wildsurfing Resources, however, the latest CEQA handbook identified minimum analysis criteria as follows: (Impact REC-2) The proposed project would include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. This CEQA section does not evaluate the potential adverse effects of the construction of the 64.8-acre of additional recreational facilities in portions of sensitive habitat. This must be addressed for CEQA compliance.

Chapter/Section: 4.21 Program EIR Mitigation Measures

Carney

Specific Comments:

- 4.21/11 – MM AES-5a minimizes daytime glare, including the usage of non-reflective building materials. However, no mention of bird-safe building design is mentioned to reduce potential bird strikes. The MBTA and CDFW protect migratory birds, thus, bird-safe design requirements/approval is recommended to further reduce potential impacts.
- 4.21-19 – MM BIO-1d minimizes impacts to burrowing owl through pre-construction surveys in accordance with CDFW 2012 protocol. However, it does not specify the window in which the surveys should be conducted. CDFW protocol for burrowing owl requires one survey 14 days prior to ground disturbance and a second survey 24 hours prior to construction. Recommend to add for MMRP tracking.
- 4.21-19 – MM BIO-1d minimizes impacts to nesting birds through avoidance and minimization measures, including pre-construction buffers and Environmental Sensitive Area (ESA) buffers should surveys be positive for active bird nests. Recommend to revise the current “no disturbance buffer of 150 feet” to a buffer of 250 feet for non-raptors, and 500-feet for raptors (per CDFW guidelines), or a reduced buffer deemed appropriate in consultation with CDFW.

Chapter/Section: Chapter 12 – Agencies Contacted and Commenters on the Draft EIR

Walker

General Comments:

- OSEC’s prior comments repeatedly asked for stronger greenhouse gas accountability, including enforceable commitments, local mitigation options, transparent verification, future project-level GHG monitoring, and alignment with Brisbane’s 2040 net-zero goal. The FEIR responses largely do not address the substance of those concerns. Instead, many responses simply refer to General Response 6 and Chapter 15, which remove Threshold GHG-1 and the associated impact analysis from the Final EIR.
- The practical effect is that the FEIR addresses greenhouse gas accountability concerns primarily by changing the significance determination rather than by reducing, tracking, or otherwise managing the projected emissions themselves. While the City has discretion to adopt this approach, it should be recognized as a deliberate policy decision to remove previously proposed accountability mechanisms, not simply a technical refinement of the environmental analysis. This decision also creates a significant tension with Brisbane’s adopted Climate Emergency Declaration and its stated goal of achieving net-zero greenhouse gas emissions by 2040. The FEIR repeatedly notes that Baylands is not the vehicle for implementing those goals; however, if the City’s largest development project is not expected to measure, track, or materially contribute toward those commitments, it becomes increasingly difficult to understand how those commitments will ultimately be achieved.
- The FEIR’s revised approach relies heavily on the premise that Baylands’ transit-oriented design, VMT reduction measures, all-electric buildings, EV infrastructure, jobs-housing relationships, and other climate-oriented features will produce beneficial greenhouse gas outcomes. These may very well be positive features, and OSEC generally supports many of

them. However, the FEIR removes the very mechanisms that would allow the City to verify whether these anticipated benefits are actually achieved over time. If actual emissions are not tracked and reported, Brisbane will have no way to determine whether the project's urbanist design assumptions performed as expected, exceeded expectations, or fell short. This includes key assumptions regarding transportation behavior, vehicle electrification, transit use, and the relationship between jobs, housing, and commuting patterns. The City is effectively being asked to accept the projected climate benefits of these measures while relinquishing its ability to evaluate their real-world effectiveness.

- The central recommendation is that the Baylands Specific Plan should not be approved unless long-term GHG tracking, public reporting, and a mechanism for future accountability are restored as conditions of approval. [general point 2]

Specific Comments:

- General Response 6, Responses to GHG Comments, pp. 13-23 to 13-36 – General Response 6 acknowledges that many commenters questioned the reliability, feasibility, and enforceability of GHG offset credits. However, rather than strengthening the accountability framework, the FEIR removes Threshold GHG-1 entirely and the associated GHG mitigation structure and claims that therefore nothing must be done. This response does not adequately address OSEC's broader concern that actual project emissions still matter and should be tracked over time. The projected 51,260 MTCO₂e of annual emissions have not gone anywhere – all that has changed is that someone has chosen a legal framework that doesn't require anyone to do anything about them.
- Response M-OSEC-83, p. 13-301 – OSEC asked for enforceable commitments, financial guarantees, and a stronger local VMT-reduction / vehicle electrification strategy. The response refers to General Responses 5 and 6 and Chapter 15, but does not provide a replacement accountability mechanism after removing Threshold GHG-1. The response should be revised to identify how actual emissions will be measured, reported, and addressed over the life of the project.
- Response M-OSEC-271, pp. 13-419 to 13-420 – OSEC specifically recommended integrating real-world fuel mix and EV adoption data into future project-level monitoring and GHG reporting. The response again relies on existing modeling and the removal of Threshold GHG-1. This is insufficient. Because vehicle technology and grid emissions are changing rapidly, the City should require periodic updates using real-world data rather than relying only on static projections.
- Responses M-OSEC-282 through M-OSEC-293, pp. 13-425 to 13-429 – OSEC raised concerns about offsets, local mitigation, the Climate Emergency Declaration, and the need for direct, flexible, enforceable local action. The responses largely refer back to General Response 6. This does not address the underlying policy question: if Brisbane's largest development project is not required to measure or mitigate actual emissions outcomes, how will Brisbane maintain a credible path toward its 2030 and 2040 climate goals?
- Response M-OSEC-288, p. 13-428 – OSEC proposed a Climate Mitigation and Resilience Fund as a local fallback mechanism if sufficient qualifying offsets could not be procured. The response rejects this by reference to the removal of Threshold GHG-1. The City should reconsider this approach. Even if CEQA no longer requires offset mitigation, the City may

still choose to require local GHG accountability as a policy condition of approval, development agreement term, or Specific Plan implementation requirement.

- Response M-OSEC-289, p. 13-428 – OSEC requested transparent verification and authority to deny permits if contribution or offset requirements were not met. The response does not provide a comparable enforcement mechanism after the offset framework is removed. If the City removes the prior offset and true-up structure, it should replace it with a transparent reporting and accountability framework rather than leaving no meaningful emissions-performance backstop of any kind.

Chapter/Section: Chapter 15 Draft EIR Revisions: Section 4.10, Greenhouse Gas Emissions Resources

Walker

General Comments:

- The revised GHG analysis changes the question from whether the project will result in a net increase in greenhouse gas emissions to whether the project is consistent with selected climate-oriented design and policy criteria. This may support a revised CEQA significance determination, but it does not answer the local governance question of whether Brisbane will track and manage the actual emissions consequences of the largest development project in the City's history.
- The FEIR should not treat consistency with regional climate policy as a substitute for local emissions accountability. A project can include many positive climate-forward design features and still materially affect Brisbane's emissions inventory.

Specific Comments:

- Section 4.10 revisions / removal of Threshold GHG-1 – Removing Threshold GHG-1 eliminates the prior outcome-based framework for determining whether the project results in a net increase in GHG emissions. If the City proceeds with a consistency-based threshold, it should still retain separate project-level emissions tracking and public reporting as an implementation requirement.
- Section 4.10 revisions / removal of GHG mitigation and true-up – The FEIR removes the offset requirement, GHG Emissions Reduction Plan, and periodic true-up process. At minimum, the City should restore a non-punitive monitoring framework requiring periodic measurement and public reporting of actual project emissions throughout buildout and operation, including transportation, energy, water/wastewater, and stationary source emissions.
- Section 4.10 / projected emissions – The project is still projected to generate approximately 51,260 MTCO₂e annually, most of which is associated with mobile sources. Even if transportation emissions are treated differently because of regional VMT and fleet-electrification dynamics, the remaining non-mobile emissions are still substantial. At approximately 5,832 MTCO₂e annually, these emissions are roughly one-third the magnitude of Brisbane's entire 2023 community-wide natural gas emissions inventory

(18,183 MTCO₂e). While this comparison is not intended to imply that Baylands will use natural gas, it illustrates the scale of the remaining emissions. In fact, it is noteworthy that a development of this size is projected to add emissions of only this magnitude. However, emissions at this scale are not at all insignificant and still large enough to warrant continued measurement, reporting, and oversight rather than complete removal of long-term accountability mechanisms.

- Section 4.10 / VMT and mobile emissions – VMT remains useful for evaluating land-use efficiency, congestion, and transportation impacts, but it is an increasingly imperfect proxy for GHG emissions as California’s fleet electrifies and the grid decarbonizes. The City should require future reporting that distinguishes vehicle miles traveled from fossil-fueled vehicle miles traveled, EV adoption, and real-world fleet emissions.

Chapter/Section: Chapter 17 Mitigation Monitoring and Reporting Program

Walker

General Comments:

- The MMRP should not only confirm installation of climate-oriented project features. It should also include ongoing GHG tracking and reporting so the City, future Councils, OSEC, and the public can understand whether the project is performing better, worse, or roughly as projected.
- Monitoring without emissions performance data is not accountability. It is a checklist.

Specific Comments:

- GHG monitoring – Add a requirement for periodic project-level GHG reporting throughout buildout and operation. Reporting should compare actual performance against FEIR projections and should be made publicly available.
- Implementation triggers – Require GHG reporting at major project milestones, such as phase approvals, certificate of occupancy milestones, and recurring intervals after operation begins.
- Adaptive governance – The City should preserve the ability to consider future mitigation, local investment, or emissions-reduction measures if actual emissions materially exceed projections or if future Climate Action Plan updates establish additional implementation frameworks.

Overall Recommendation:

OSEC should recommend that the City not approve the Baylands Specific Plan unless GHG tracking and accountability are restored.

- OSEC agrees that Baylands should not be expected to solve Brisbane’s entire climate challenge. However, it is reasonable to expect Baylands to account for and report on its own emissions impacts over time.
- The FEIR projects approximately 51,260 MTCO₂e annually at buildout, equivalent to roughly 60 percent of Brisbane’s entire 2005 community-wide greenhouse gas inventory. At the same time, Brisbane has achieved only modest progress toward its adopted climate goals, reducing emissions by just over 15 percent below the 2005 baseline as of the most recent inventory. Without meaningful accountability, the scale of emissions associated with Baylands risks overwhelming much of the progress already achieved by the community while making future reductions even more difficult.
- The City has previously recognized the importance of ongoing greenhouse gas inventories and annual reporting through its Climate Action Plan. In practice, those inventories have often been difficult to produce consistently and on schedule. Given the size and significance of the Baylands project, it is reasonable to require the developer to track, measure, and publicly report emissions associated with the development itself. This would provide future decision-makers, OSEC, and the public with the information needed to evaluate actual project performance and maintain a credible pathway toward Brisbane’s adopted climate commitments.
- The issue is not whether Baylands must eliminate every ton of greenhouse gas emissions. The issue is whether the City should approve the largest development project in Brisbane’s history while simultaneously removing the mechanisms that would allow those emissions to be measured, understood, and managed over time.

[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.]

Baylands 2026 Specific Plan

Chapter/Section: Chapter 4 - Sustainability Framework/ 4.9 Open Space and Habitat

Carney

General Comments:

- Recommend incorporating development standards that support urban forestry principles within the Baylands Specific Plan Area. All developed areas are recommended to adhere to International Society of Arboriculture (ISA) principles for urban forestry development standards and focus on promoting strategic tree plantings, ensuring native species diversity, preserve/maintain trees once planted, and establishing additional wildlife habitat in open space areas utilizing native tree species. These guidelines provide standards for mitigating infrastructure conflicts and maintaining long-term canopy health. Well-maintained urban forest canopy, with adjacent enhanced open space areas, will help maintain local biodiversity and natural habitat in the Baylands Specific Plan Area.