

**Comments on the Scope and Content
Of the 2020 Environmental Impact Report
For the Brisbane Baylands Specific Plan
From
CREBL Action Team**

In response to the request for comments in the notice of preparation for the Brisbane Baylands Specific Plan EIR, the Action Team of the Committee for Renewable Energy in the Baylands (CREBL) offers the following:

Renewable Energy Alternative: One of the alternatives to the landowner's Specific Plan proposal studied in the Environmental Impact Report (EIR) should be a Renewable Energy Alternative. It is appropriately revised from the original program level alternative. Some of the broad features of this alternative should be:

1. *Solar Farm*. The solar farm should be large enough to not only provide all the energy required to bring the Baylands development to zero carbon as specified in the Sustainability Framework referenced in the General Plan but also to provide a significant amount of the energy needs of the rest of Brisbane. The 2013 study by the National Renewable Energy Lab (NREL) found that a 100-acre solar farm on the landfill was economically feasible. With the continuing significant decline in solar prices, it will be even more feasible under current and future conditions. Furthermore, Peninsula Clean Energy has expressed an interest in locally generated solar energy. The State of California has set goals for renewable energy and reduction in greenhouse gas emissions, and this solar farm would make an important community contribution to their achievement.

2. Location of the solar farm. The eastern garbage-based landfill is the best location for several reasons. The eastern part of the Baylands gets more sunlight. An economically efficient location of solar farms is over parking areas. That observation is relevant because both Recology and the High-Speed Rail Authority as well as the Campus Commercial proposed in the Specific Plan will have parking needs. A collaboration between all of these land uses, presuming their implementation, would result in the most efficient outcome.
3. Microgrid and battery storage. A greater energy independence for Brisbane, especially in emergencies, would be made possible by the Baylands having its own microgrid and battery storage capacity for the excess solar energy generated during peak hours. That storage capacity would assist the Statewide energy-production system achieve a better 24-hour balance. It has already experienced periods when daytime energy produced has exceeded the immediate need while meeting the night-time supply need required fossil-fuel backup. Two Brisbane residents have made a substantial presentation to the City Council promoting the advantages of this approach.
4. Further differentiation from Specific Plan. Another way in which this alternative could be different for EIR study purposes would be the amount of commercial space allowed. The housing units would be the same as in the Specific Plan, but the commercial square footage could be 4 million plus the 500,000 square feet for the hotels.

High-Speed Rail Alternative: Since the High-Speed Rail Authority Board has identified the east of Caltrain landfill as the preferred location of its Northern Maintenance Yard site, and the environmental study of that potential alternative land use is underway, it makes sense for it to be one of the alternatives studied in the Baylands EIR. CREBL mentions this because previous regional High-Speed Rail managers have expressed an interest in cooperating with a solar farm plan on the Baylands.

Environmentally superior alternative: The previous program-level EIR for the Baylands identified the Renewable Energy Alternative as the environmentally superior alternative. If the

City really believes in its Sustainability Framework and in its standing as one of the most environmentally committed cities in California, then a truly comprehensive and honest EIR must include and seriously consider the renewable energy alternative.

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