



## **ACTION ITEM**

### Metropolitan Transportation Commission/Association of Bay Area Governments' Plan Bay Area 2050+

#### Summary

Staff from the Metropolitan Transportation Commission (MTC), will make a presentation on the MTC and Association of Bay Area Governments' (ABAG) Draft Plan Bay Area 2050+, which is the regional transportation plan (RTP)/sustainable communities strategy (SCS) for the nine-county San Francisco Bay Area, and describe its relationship to the Delta Plan.

Pursuant to Water Code section 85212, the Council is required to review and provide advice regarding a metropolitan planning organization's (MPO) draft SCS if the RTP includes land within the Delta. Based on their review, Council staff has not identified any inconsistency of the Plan Bay Area 2050+ with the Delta Plan and is recommending the Council approve the proposed comment letter to MTC/ABAG.

#### Background

The Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, § 85000 et seq.; Delta Reform Act) grants the Council specific authority to review and advise local and regional planning agencies regarding the consistency of local and regional planning documents, which includes an SCS, with the Delta Plan. (Wat. Code, § 85212.) The Delta Reform Act also requires an MPO preparing an SCS that is part of a RTP that includes land within the primary zone or secondary zone of the Delta to "consult with the Council early in the planning process regarding the issues and policy choices relating to the Council's advice." (Wat. Code, § 85212.)

An SCS is one element of a larger RTP, (Gov. Code, § 65080.) which is exempt from being a covered action. (Wat. Code, § 85057.5, subd. (b)(3).) Additionally, a plan,

program, project, or activity within the secondary zone of the Delta that an MPO determines is consistent with an SCS and that the State Air Resources Board has determined would achieve regional greenhouse gas emission reduction targets also is exempt from being a covered action. (Wat. Code, § 85057.5, subd. (b)(4).)

## MTC/ABAG Plan Bay Area 2050+

MTC is designated by the federal government as the MPO for the San Francisco Bay Area, which includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties and 101 cities located within these counties. Portions of Alameda, Contra Costa, and Solano Counties include land within the Delta. As an MPO, MTC is charged with preparing an RTP that must be updated every four years in coordination with each local government. ABAG is the council of governments and regional planning agency for the San Francisco Bay Area. MTC and ABAG jointly adopted an RTP/ SCS and associated Environmental Impact Report (EIR) for the San Francisco Bay Area region in 2013 and updated the RTP/SCS in both 2017 and 2021.

The most recent long-range plan for the San Francisco Bay Area, Plan Bay Area 2050, was adopted in 2021. As the San Francisco Bay Area's third RTP to include an SCS, the 2021 plan included a comprehensive update of Plan Bay Area 2040, adopted in 2017, and expanded the scope relative to prior plans by examining the themes of economic development and environmental resilience. Plan Bay Area 2050 also provided a thorough financial accounting of regional affordable housing needs. The Council considered and approved a Plan Bay Area 2050 comment letter providing advice on the SCS and comments on the EIR on July 20, 2021.

Plan Bay Area 2050+ represents the region's third update to the RTP/SCS. Plan Bay Area 2050+ is a transportation investment and land use strategy for the San Francisco Bay Area region that aims to help the region improve air quality, preserve open space and natural resources, and reduce greenhouse gas emissions. Projected transportation projects that fall within the boundary of the Delta must demonstrate consistency with the Delta Plan. (Wat. Code, § 85212.) Plan Bay Area 2050+ and supporting documents are available at: <https://planbayarea.org/>.

### Staff Activity and Notice of Preparation Comments

Council staff met with MTC/ABAG staff to discuss the Plan Bay Area 2050+ on October 20, 2025. During this meeting, MTC/ABAG shared the limited scope of the update focusing on housing, the economy, transportation, and environmental issues. MTC/ABAG staff and Council staff also discussed ways in which Plan Bay Area 2050+ could be consistent with the Delta Plan and support the Council's ability to achieve the coequal goals. Council staff submitted a comment letter on the Notice of Preparation (NOP) for the Draft Environmental Impact Report (Draft EIR) for Plan Bay Area 2050+ on February 14, 2025 (Attachment 1).

### Summary of Plan Bay Area 2050+ and Draft EIR Comments

Council staff has prepared a proposed comment letter on Plan Bay Area 2050+ and the Draft EIR (Attachment 2). The 60-day comment period for the Draft EIR ends December 18, 2025, the day of the Council meeting.

### *Consistency with Ecosystem Restoration Needs and Sufficiency of Lands Set Aside*

Water Code section 85212 requires that the Council's input on an RTP/SCS include, but not be limited to, reviewing both of the following:

- the consistency of local and regional planning documents with the ecosystem restoration needs of the Delta.
- whether the land set aside for natural resource protection is sufficient to meet the Delta ecosystem needs.

Council's staff's analysis of these considerations is outlined in the proposed comment letter (Attachment 2) and summarized below.

### Consistency with Restoration Needs

The Delta Plan designates six priority habitat restoration areas (PHRAs) that have the greatest potential for large-scale habitat restoration. (Delta Plan, Chapter 4, p. 4-47 to 4-50.) Delta Plan Policy **ER P3** (Cal. Code Regs., tit. 23, § 5007.) states that significant adverse impacts to the opportunity to restore habitat must be avoided or mitigated in these PHRAs. (Cal. Code Regs., tit. 23, [app. 5](https://bit.ly/495qaek) (<https://bit.ly/495qaek>).)

Four PHRAs are located within the MTC/ABAG region: (1) Suisun Marsh; (2) Cache Slough; (3) Yolo Bypass; and (4) Western Delta PHRA<sup>1</sup>. The consistency of Plan Bay Area 2050+ with the ecosystem restoration needs of the Delta is based on its potential to impact the opportunity to restore habitat in these PHRAs. Plan Bay Area 2050+ designates locally nominated Priority Conservation Areas (PCAs), which are lands set aside for protection. The Council supports proposed PCA designations in all of the following:

- the Cache Slough PCA, which aligns with the Cache Slough PHRA.
- the Delta Recreation Area PCA, which covers the Dutch Slough portion of the Western Delta PHRA.
- the Tri-City-County Cooperative Planning Area PCA, which covers the northwestern corner of the Suisun Marsh PHRA.

Implementation of the Plan Bay Area 2050+ would not result in transportation projects in areas that are not consistent with existing long-range plans, including the Delta Plan (Draft EIR p. 3.11-25). Thus, Plan Bay Area 2050+ would not conflict with the environmental protection requirements imposed by the Delta Plan.

**Finding:** Based on a review of Plan Bay Area 2050+ and the Draft EIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of Plan Bay Area 2050+ with Delta Plan Policy **ER P3**.

#### Sufficiency of Lands Set Aside

The Plan Bay Area 2050+ does not specifically address setting aside lands for natural resource protection. MTC/ABAG notes that this is the prerogative of local agencies, such as a city or county, that approve land use plans and projects to include priority development areas aimed to improve transportation, housing, the economy, and environmental issues. Plan Bay Area 2050+ core growth approach is to focus growth within existing communities along the established transportation network reflecting the foundation and regional growth pattern (Plan Bay Area 2050+ p. 11).

Senate Bill 375 (Stats. 2008, ch. 728.) provides California Environmental Quality Act

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<sup>1</sup> Specifically, the southern and western portions of the Yolo Bypass PHRA and Winter Island and Dutch Slough portions of the Western Delta PHRA.

(CEQA) streamlining benefits for certain projects that are consistent with the RTP/SCS land use and transportation pattern. The Plan Bay Area 2050+ and Draft EIR aim to facilitate these CEQA streamlining benefits for qualifying residential, mixed-use, and transit priority projects and sustainable communities projects that are consistent with the general use designation, density, building intensity, and applicable policies specified in the Plan Bay Area 2050+ Draft EIR (p.1-20, Table 1-2). Based on the locations of the High Frequency Transit areas, the Plan Bay Area 2050+ is unlikely to result in development in areas of the Delta that are necessary to meet the Delta's ecosystem needs.

**Finding:** Based on a review of the Plan Bay Area 2050+ and the Draft EIR, and in compliance with the Water Code section 85212, Council staff has not identified any inconsistency of the 2025 Blueprint with Delta Plan policy **ER P3**.

## Consistency with the Delta Plan

### *Land Use Consistency*

Delta Plan policy **DP P1** (Cal. Code Regs., tit. 23, § 5010.) places certain limits on new urban development within the Delta. New residential, commercial, and industrial development must be limited to areas that city or county general plans designate for that development as of the date of the Delta Plan's adoption of May 16, 2013.

Future development anticipated in Plan Bay Area 2050+ is located in areas designated for future designations. The Draft EIR identifies that portions of three counties, and portions of cities within them, lie in or partially in the Delta and future actions proposed or funded by local or regional agencies in areas that overlap with the Delta must demonstrate consistency with the Delta Plan if they qualify as "covered actions" (Wat. Code, § 85225.) (Draft EIR p. 3.11-17.)

The Draft EIR acknowledges consistency with policy **DP P1** in the regulatory setting of the Draft EIR Land Use, Population, and Housing and Planning Section 3.11. Regional growth anticipated within or adjacent to the Delta would limit residential, commercial, or industrial development to areas that city or county general plans designate for that type of development.

**Finding:** Based on a review of the Plan Bay Area 2050+ and Draft EIR, and in

compliance with Water Code section 85212, Council staff has not identified any inconsistency of the Plan Bay Area 2050+ with Delta Plan policy **DP P1**.

### *Transportation Investments*

Plan Bay Area 2050+ does not include transportation investments in rural or urban areas located within the Delta. However, Plan Bay Area 2050+ proposes transportation investments that could shift the entire San Francisco Bay Area toward more sustainable travel patterns in 2050 and beyond, including investments in pedestrian and bicycle infrastructure that could help commuters to walk and bike to work more easily and enable all residents to enjoy the outdoors. Currently, the nine-county Plan Bay Area 2050+ includes nearly 1 million acres of publicly accessible parks and open space containing networks of trails. The implementation of Plan Bay Area 2050+ could increase the number of residents making use of existing parkland (Draft EIR p. 3.13-4.). Local jurisdictions strive to ensure that new developments make adequate provisions for new parkland, which would include future proposed transportation projects located within the Delta. These transportation projects would advance Delta Plan recommendation **DP R11** to enhance the region's recreation opportunities (Draft EIR p. 2-22).

The Delta Plan also recommends providing adequate infrastructure in the Delta. Recommendation **DP P5** calls for infrastructure, such as roads and highways, to meet the needs of development consistent with an SCS. Plan Bay Area 2050+ includes transportation investments potentially located within the Delta, which may include multiple pedestrian- and bike-friendly projects (Plan Bay Area 2050+ p. 71-74).

**Findings:** Based on review of the Plan Bay Area 2050+ and Draft EIR and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the recommended transportation projects identified in Plan Bay Area 2050+ with Delta Plan recommendations concerning transportation in the Delta.

### **Staff Recommendation**

Staff recommends the Council approve the proposed comment letter on the Draft EIR and the Plan Bay Area 2050+ (Attachment 2). Following Council approval, staff will submit the letter to MTC/ ABAG.

## Fiscal Information

Not applicable.

## List of Attachments

Attachment 1: Council's NOP Comment Letter, February 14, 2025

Attachment 2: Council's Plan Bay Area 2050+ Draft EIR Proposed Comment Letter

## Contact

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