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July 23, 2026

Edith Verdin
San Joaquin Council of Governments
555 E. Weber Ave.
Stockton, CA 95202

Delivered via email: rtp@sjcog.org

**Re: Comments on the San Joaquin Council of Governments Draft 2026
Regional Transportation Plan and Sustainable Communities Strategy
and Draft Programmatic Environmental Impact Report, SCH#
2025041249**

Dear Edith Verdin:

Thank you for the opportunity to review and comment on the Draft Programmatic Environmental Impact Report (Draft PEIR) for the San Joaquin Council of Governments (SJCOG) Draft 2026 Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS; collectively 2026 RTP/SCS). The Delta Stewardship Council (Council) recognizes the objectives described in the 2026 RTP/SCS and Draft PEIR to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and greenhouse gas emissions reduction while considering financial, growth, and regulatory constraints.

This letter summarizes the requirements of the Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, § 85000 et seq., Delta Reform Act) pertaining to the 2026 RTP/SCS and provides the Council's comments on the 2026 RTP/SCS and Draft

PEIR. The Council is an independent state agency established by the Delta Reform Act, charged with furthering California's coequal goals of providing a more reliable water supply and protecting, restoring, and enhancing the Sacramento-San Joaquin River Delta (Delta) ecosystem. (Wat. Code, § 85054.) The Delta Reform Act further states that the coequal goals are to be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place. (Wat. Code, § 85054.) The Council is charged with furthering California's coequal goals for the Delta through the adoption and implementation of the Delta Plan. (Wat. Code, § 85300.)

SJCOG's 2026 RTP/SCS is a regional transportation plan for the San Joaquin County region, which includes the incorporated cities of Escalon, Lodi, Manteca, Mountain House, Ripon, Stockton, and Tracy and all unincorporated areas under the jurisdiction of San Joaquin County.

Delta Reform Act Requirements for Sustainable Communities Strategies

The Delta Reform Act requires metropolitan planning organizations (MPOs) to consult with the Council when preparing an SCS that includes land within the primary or secondary zones of the Delta. (Wat. Code § 85212.) Council staff and SJCOG staff met for this purpose on May 13, 2025.

The Delta Reform Act also requires SJCOG to provide a draft SCS to the Council no later than 60 days prior to the adoption of the final RTP. (Wat. Code § 85212.) SJCOG submitted a draft 2026 RTP/SCS to the Council on June 12, 2026.

Council's Review and Input on the Draft Programmatic EIR and the 2026 RTP/SCS

This section summarizes Council staff's review of and input on the 2026 RTP/SCS. It also summarizes Council staff's comments on the Draft PEIR.

1. Consistency with Ecosystem Restoration Needs and Sufficiency of Lands Set Aside

Water Code section 85212 requires that the Council's input on local and regional planning documents, including a SCS, include, but not be limited to, both of the following:

- the consistency of those 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

a. 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 areas (depicted in Cal. Code, Regs., tit. 23, app. 5.) (<http://deltacouncil.ca.gov/sites/default/files/2015/09/Appendix%205.pdf>).

Two PHRAs are located partially or wholly within the SJCOG region 2026 RTP/SCS planning area: the Cosumnes-Mokelumne Confluence, located in the northwest area of San Joaquin County, and the Lower San Joaquin River Floodplain, located southwest of Stockton. In the Council's May 19, 2025, comment letter on the Notice of Preparation (NOP) for the Draft PEIR, staff requested that the Draft PEIR describe the planned land uses identified in these areas and discuss how significant adverse impacts to the opportunity to restore habitat in these locations would be avoided or mitigated.

The 2026 RTP/SCS seeks to improve jobs and services, reduce vehicle travel, and improve air quality by reducing transportation-related emissions. The Draft PEIR identifies that new development anticipated within the Delta in the 2026 RTP/SCS would occur as infill, mixed use, and transit-oriented development within existing urbanized areas and areas already designated for such development in adopted city and county general plans. (2026 RTP/SCS p. 3-14) The 2026 RTP/SCS neither identifies, nor specifically states, that future development would occur in these PHRAs. Draft PEIR Figure 4.3-2, Wetlands and Drainages in the SJCOG Region, does not identify Transportation Projects within these PHRAs. (Draft PEIR, p. 4.3-7, Draft 2026 RTP/SCS, Appendix F).

Finding: Based on the review of the 2026 RTP/SCS and Draft PEIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the 2026 RTP/SCS with Delta Plan regulatory policy **ER P3**.

b. Sufficiency of Lands Set Aside

The 2026 RTP/SCS does not specifically address setting aside lands for natural resource protection. The 2026 RTP/SCS incentivizes natural resource protection by encouraging growth in existing designated population centers and by maximizing the efficiency of the existing transportation network. Council staff recognizes SJCOG is continuing the principles established in previous RTP/SCS cycles that encourage compact, mixed-use, and infill development; a variety of housing types and transportation modes; quality design; and natural resource conservation. The 2026 RTP/SCS is designed to maintain and foster the balance between jobs and housing and to optimize transportation investments that support those land uses.

Senate Bill 375 (Stats. 2008, ch. 728.) provides California Environmental Quality Act (Pub. Resources Code, § 21000, et seq.; CEQA) streamlining benefits for certain projects that are consistent with the RTP/SCS land use and transportation pattern. The 2026 RTP/SCS and Draft PEIR aim to facilitate these CEQA streamlining benefits for qualifying residential, mixed-use, and transit priority projects that are consistent with the general use designation, density, building intensity, and applicable policies specified in the 2026 RTP/SCS (Draft PEIR, p. 1-3). The 2026 RTP/SCS Appendix U maps and figures illustrate the location of the High Quality Transit Areas and the locations of new housing and employment growth (Appendix U Statutory Mapping, pp. U-3, U-4, U-7). Based on the mapped locations, the 2026 RTP/SCS would not provide CEQA streamlining benefits to projects outside of existing city boundaries or within any PHRA. Based on the locations of the High Quality Transit Areas, the 2026 RTP/SCS is not likely to incentivize development in areas within the Delta that are necessary to meet the Delta's ecosystem needs.

Finding: Based on the review of the 2026 RTP/SCS and the Draft PEIR, and in compliance with the Water Code section 85212, Council staff has not identified any inconsistency of the 2026 RTP/SCS with Delta Plan regulatory policy **ER P3**.

2. Consistency with the Delta Plan

The Delta Reform Act requires the Council to review and provide timely advice to planning agencies regarding the consistency of local and regional planning documents, including an SCS, with the Delta Plan. (Wat. Code, § 85212.)

a. Land Use Pattern

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. This policy is intended to strengthen existing Delta communities while protecting designated agricultural land and open space, providing land for ecosystem restoration needs, and reducing flood risk.

A state or local agency that proposes to carry out, approve, or fund an action that occurs in whole or in part in the Delta is required to determine if that action is a covered action, and if so, to prepare a written Certification of Consistency with detailed findings as to whether the covered action is consistent with the Delta Plan and submit that certification to the Council prior to implementation of the project. (Wat. Code, § 85225.) The Delta Reform Act exempts from this requirement actions within the Secondary Zone of the Delta that an MPO determines are consistent with its SCS, provided that the State Air Resources Board has determined the SCS would achieve regional greenhouse gas emissions reduction targets. (Wat. Code § 85057.5, subd. (b)(4).) SJCOG is the MPO for the San Joaquin County region, which contains portions of the Secondary Zone of the Delta. Thus, Water Code section 85057.5, subdivision (b)(4), provides SJCOG with a role in shaping the State's Delta policy.

Council staff's NOP comment letter dated May 19, 2025, requested the Draft PEIR analyze whether the 2026 RTP/SCS would include new urban development within the Delta. The Draft PEIR does not directly acknowledge consistency with policy **DP P1**. However, SJCOG acknowledges the 2026 RTP/SCS is required to ensure consistency with the Delta Plan. Local project exemptions from the Delta Plan requirements are possible if SJCOG determines that they are consistent with the applicable RTP/SCS (2026 RTP/SCS, p.1-17). (Wat. Code, § 85057.5, subd. (b)(4).)

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. The housing strategies would continue the SJCOG region's commitment to growth in infill areas. Because the 2026 RTP/SCS uses established growth forecasts, relies on local general plans and Housing Elements, and does not propose new development areas or infrastructure extensions that could induce unplanned growth in the Secondary Zone of the Delta, the proposed 2026 RTP/SCS would be consistent with projected and planned growth anticipated under **DP P1** (2026 RTP/SCS, p. 4.17-3).

Finding: Based on the review of the 2026 RTP/SCS and Draft PEIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the 2026 RTP/SCS with Delta Plan regulatory policy **DP P1**.

a. Transportation Investments

The recommended transportation projects in the 2026 RTP/SCS include investments in both rural and urban areas located within the Delta. These transportation projects would advance Delta Plan recommendation **DP R11** to protect and improve existing recreation opportunities while seeking ways of providing new and better coordination opportunities across San Joaquin County. The 2026 RTP/SCS investments include projects within the Delta that support recreation, such as proposed new and improved bicycle and pedestrian routes that would provide new and improved connectivity to transit and local destinations throughout San Joaquin County (2026 RTP/SCS, Ch. 5).

The Delta Plan also recommends providing adequate infrastructure within the Delta. Recommendation **DP R5** states: "The California Department of Transportation, local agencies, and utilities should plan infrastructure, such as roads and highways, to meet needs of development consistent with sustainable community strategies, local plans, the Delta Protection Commission's Land Use and Resource Management Plan for the Primary Zone of the Delta, and the Delta Plan." Several planned transportation investments in the 2026 RTP/SCS address the effects of extreme weather impacts by supporting infrastructure that can withstand extreme heat, flooding, and other environmental stressors. The 2026 RTP/SCS promotes energy-efficient infrastructure and clean transportation technologies

while coordinating across jurisdictions to improve long-term system reliability that would improve the capacity and safety of roads and highways in the Delta. The 2026 RTP/SCS also includes multiple projects to restore pavement and redesign streetscapes to be more pedestrian and bike friendly. Roadway improvement projects in the Delta described in the 2026 RTP/SCS and Draft PEIR would improve agricultural and goods movement travel and improve accessibility for slow-moving farm equipment (2026 RTP/SCS, Ch. 3; Appendix F).

Finding: Based on the review of the 2026 RTP/SCS and Draft PEIR, and in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the recommended transportation projects identified in the 2026 RTP/SCS with Delta Plan recommendations concerning transportation in the Delta.

Closing Comments

Pursuant to Water Code section 85212, Council staff has reviewed and provided advice and input on the 2026 RTP/SCS and Draft PEIR as outlined in this letter. Council staff has not identified any inconsistency with the Delta Plan. The two plans are complementary in nature, serving to protect the Delta while promoting sustainable growth and economic vitality in the broader region.

Council staff invites the San Joaquin Council of Governments to continue to engage Council staff following the adoption of the 2026 RTP/SCS to coordinate implementation and subsequent plan updates. Please contact Eva Bush at Eva.Bush@deltacouncil.ca.gov with any questions.

Sincerely,

Jeff Henderson
Deputy Executive Officer

Attachment 1: Council's NOP Comment Letter, May 19, 2025

