



ACTION ITEM

San Joaquin Council of Governments Draft 2026 Regional Transportation Plan/Sustainable Communities Strategy

Summary

Edith Verdin, a Senior Regional Planner at the San Joaquin Council of Governments (SJCOG), will make a presentation on the SJCOG Draft 2026 Regional Transportation Plan/Sustainable Communities Strategy (2026 RTP/SCS) and 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 sustainable communities strategy (SCS) if the regional transportation plan (RTP) includes land within the Primary or Secondary zones of the Delta. Based on their review, Council staff has not identified any inconsistency of the 2026 RTP/SCS with the Delta Plan and is recommending the Council approve the draft comment letter to SJCOG.

Requested Action

The Council's authority to review and provide advice for an SCS is pursuant to Water Code section 85212. Based on a review of the 2026 RTP/SCS and Draft Programmatic Environmental Impact Report (Draft PEIR), Council staff has not identified any inconsistency of the 2026 RTP/SCS with the Delta Plan and are recommending that the Council approve a draft comment letter to SJCOG on the Draft 2026 RTP/SCS and Draft PEIR.

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, including an SCS, with the Delta Plan, including consistency with the ecosystem restoration needs of the Delta and whether the land set aside

for natural resource protection is sufficient to meet the Delta ecosystem needs. (Wat. Code, § 85212.) The Delta Reform Act also requires an MPO preparing an SCS that includes land within the Primary Zone or Secondary Zone of the Delta to “consult with the [C]ouncil early in the planning process regarding the issues and policy choices relating to the [C]ouncil’s advice.” (Wat. Code, § 85212). This is important because Water Code section 85057.5, subdivision (b)(4), exempts proposed actions within the Secondary Zone of the Delta that an MPO determines are consistent with an SCS and that the State Air Resources Board has determined would achieve regional greenhouse gas emissions reduction targets. Those proposed actions are, by statutory definition, not covered actions regulated by the Council. (Wat. Code § 85057.5, subd. (b)(4).)

SJCOG 2026 RTP/SCS

SJCOG is designated by the federal government as the MPO for the San Joaquin County region, which includes the incorporated cities of Escalon, Lathrop, Lodi, Manteca, Mountain House, Ripon, Stockton, and Tracy, as well as all unincorporated areas in San Joaquin County. As an MPO, SJCOG is charged with preparing an RTP that must be updated every four years in coordination with each local government. SJCOG adopted an RTP and SCS in 2014 and updated both in 2018 and 2022.

The 2026 RTP/SCS represents SJCOG’s third update to the transportation investment and land use strategy designed to achieve regional greenhouse gas emissions reduction targets. The 2026 RTP/SCS is a transportation investment and land use strategy that aims to help the region improve air quality, preserve open space and natural resources, and reduce greenhouse gas emissions. The 2026 RTP/SCS and supporting documents are available at:

<https://www.sjco.org/275/RTP-Sustainable-Communities-Strategy>

Staff Activity and Notice of Preparation Comments

Council staff met with SJCOG staff on May 13, 2025, to discuss the 2026 RTP/SCS update and ways in which the 2026 RTP/SCS 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 2026 RTP/SCS Draft PEIR on May 19, 2025 (see Attachment 1). Additionally, Council staff has prepared a draft comment letter on the 2026 RTP/SCS and associated Draft PEIR (see Attachment 2). The comment period for the 2026 RTP/SCS and Draft PEIR ends August 6, 2026.

2026 RTP/SCS and Draft PEIR Comments

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 an SCS, include, but not be limited to, reviewing 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

Council staff's analysis of these considerations is outlined in the proposed 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 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 (depicted in Appendix 5:

<http://deltacouncil.ca.gov/sites/default/files/2015/09/Appendix%205.pdf>).

Two PHRAs are located partially or wholly within the SJCOG region: the Cosumnes-Mokelumne Confluence, located in the northwest area of San Joaquin County, and the Lower San Joaquin Floodplain, located southwest of Stockton. 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. 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 the two PHRAs.

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 in the Draft PEIR of the 2026 RTP/SCS with Delta Plan regulatory policy ER P3.

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 population centers and by maximizing the efficiency of the existing transportation network. The 2026 RTP/SCS is designed to maintain and foster the balance between jobs/housing ratio and to optimize transportation investments that support those land uses.

Senate Bill 375 (Stats. 2008, ch. 728.) provides California Environmental Quality Act (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. Based on the mapped locations of High Quality Transit Areas and locations of new housing and employment growth, the 2026 RTP/SCS would not provide CEQA streamlining benefits to projects outside of existing city boundaries or within any PHRA and 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.

Consistency with the Delta Plan 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 (May 16, 2013). The Draft PEIR does not directly acknowledge consistency with policy DP P1. However, SJCOG acknowledges compliance with 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 RTP/SCS. (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 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. (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.

Transportation Investments

The recommended transportation projects in the 2026 RTP/SCS include projects within the Delta that support recreation, such as proposed new and improved bicycle and pedestrian routes that would provide better connectivity to transit and local destinations throughout San Joaquin County. 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 coordinated opportunities within San Joaquin County.

Delta Plan 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 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.

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.

Staff Recommendation

Staff recommends the Council approve the draft comment letter on the 2026 RTP/SCS and Draft PEIR (Attachment 2). Following Council approval, staff will submit the letter to SJCOG, inclusive of any comments received from the Council at today's meeting.

Fiscal Information

Not applicable.

List of Attachments

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

Attachment 2: Council's Draft 2026 RTP/SCS and Draft PEIR Comment Letter

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