Metropolitan Transportation Commission

Meeting Agenda

Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Metropolitan Transportation Commission

Sue Noack, Chair *Stephanie Moulton-Peters, Vice Chair*

Wednesday, March 25, 2026 **9:35 AM** **Board Room - 1st Floor**

The Metropolitan Transportation Commission meeting is scheduled to take place at 9:35 a.m.

Meeting attendees may opt to attend in person for public comment and observation at 375 Beale Street, Board Room (1st Floor). In-person attendees must adhere to posted public health protocols while in the building. The meeting webcast will be available at https://mtc.ca.gov/whats-happening/meetings/live-webcasts. Members of the public are encouraged to participate remotely via Zoom at the following link or phone number.

Attendee Link: https://bayareametro.zoom.us/j/82495062112
iPhone One-Tap: US:
+16699006833,,82495062112# US (San Jose)
+14086380968,,82495062112# US (San Jose)
Join by Telephone (for higher quality, dial a number based on your current location) US:
888 788 0099 (Toll Free) or 877 853 5247 (Toll Free)
Webinar ID: 824 9506 2112
International numbers available: https://bayareametro.zoom.us/u/kbYwc0uP2W

Members of the public participating by Zoom wishing to speak should use the "raise hand" feature or dial *9. When called upon, unmute yourself or dial *6. In order to get the full Zoom experience, please make sure your application is up to date.

All standing committee meeting agendas may also be accessed on
MTC's website here: https://mtc.ca.gov/meetings-events
On Legistar here: https://mtc.legistar.com/Calendar.aspx
Detailed instructions on participating via Zoom are available at:
https://bayareametro.zoom.us/u/kdR1hznEgA
https://mtc.ca.gov/how-provide-public-comment-board-meeting-zoom

Members of the public may participate by phone or Zoom or may submit comments by email at info@bayareametro.gov by 5:00 p.m. the (business) day before the scheduled meeting date. Please include the committee or board meeting name and agenda item number in the subject line. All comments received will be submitted into the record.
Clerk: Kimberly Ward

Roster:
Sue Noack (Chair), Stephanie Moulton-Peters (Vice Chair), Margaret Abe-Koga, Eddie Ahn, David Ambuehl*, Candace Andersen, Marilyn Ezzy Ashcraft, Pat Burt, Noelia Corzo, Victoria Fleming, Dorene M. Giacopini*, Alicia John-Baptiste, Barbara Lee, Matt Mahan, Amber Manfree, Mitch Mashburn, Myrna Melgar, Nate Miley, Gina Papan, Belia Ramos, Libby Schaaf*
***Non-Voting Members**

1. Call to Order / Roll Call / Confirm Quorum

A quorum of the Commission shall be a majority of its voting members (10).

2. Pledge of Allegiance / Acknowledgement of the Flag

3. Compensation Announcement (Clerk)

4. Chair's Report

5. Executive Director's Report

5a. 26-0358 Executive Director's Report

Action: Information

Presenter: Andrew Fremier

Attachments: 5a_26-0358_1_MTC_ED_Report_03-25-2026.pdf
5a_26-0358_2_MTC_Operational_Statistics_Report_03-25-2026.pdf

6. Commissioner Comments

7. Consent Calendar

7a. 26-0359 Approval of the Commission Minutes of the February 25, 2026 meeting

Action: Commission Approval

Attachments: 7a_26-0359_February_25_2026_Draft_Commission_Minutes.pdf

7b. 26-0245 MTC Resolution No. 4756. Resolution Authorizing the Use of Teleconference Meetings by the MTC ABAG Community Advisory Council and Making Related Findings

Action: Commission Approval

Presenter: Kathleen Kane

Attachments: 7b_26-0245_1_Summary_Sheet_Telecon_Authorization_Community_Adv_Cou
7b_26-0245_2_MTC_Resolution_4756.pdf

7c. 26-0373 MTC Resolution No. 4761. Resolution Authorizing the Use of Teleconference Meetings by the Regional Network Management (RNM) Customer Advisory Group and Making Related Findings

Action: Commission Approval

Presenter: Kathleen Kane

Attachments: 7c_26-0373_1_Summary_Sheet_Telecon_Authorization_RNM_CAG.pdf
7c_26-0373_2_MTC_Resolution_4761.pdf

7d. 26-0372 MTC Resolution No. 4760. Resolution Authorizing Submission of SB63 Report on Transit Ridership Forecasts from Plan Bay Area 2050+ to Legislature and Establishing Additional Rules and Procedures Related to the SB63 Financial Efficiency Review Independent Oversight Committee

Action: Commission Approval

Presenter: Kathleen Kane

Attachments: 7d_26-0372_1_Summary_Sheet_SB63_FEROC_Delegation.pdf
7d_26-0372_2_MTC_Resolution_4760.pdf
7d_26-0372_3_SB63_Ridership_Forecast_Report.pdf

Administration Committee (Commission Consent)

7e. 26-0374 MTC Resolution No. 4753. State Route 37 Designated Sub-Recipient Agreement for Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) Funds.

Action: Commission Approval

Presenter: Kevin Chen

Attachments: 7e_26-0374_1_Summary_Sheet_SR_37_PROTECT_Funds.pdf
7e_26-0374_2_MTC_Resolution_4753.pdf

Programming and Allocations Committee (Commission Consent)

7f. 26-0376 MTC Resolution No. 3664, Revised. Allocation of $2.3 million in Regional Measure 2 (RM2) capital funds to Livermore Amador Valley Transit Authority (LAVTA) for Transit Signal Priority (TSP) Upgrade and Expansion Project.

Action: Commission Approval

Presenter: Anne Meeple

Attachments: 7f_26-0376_1_Summary_Sheet_RM2_LAVTA_TSP.pdf
7f_26-0376_2_MTC_Resolution_3664.pdf

7g. 26-0377 MTC Resolution No. 4529, Revised. An update to the allocation of State Transit Assistance (STA) Revenue-Based Exchange Funds to shift funds from BART to AC Transit for Transit Transformation Action Plan staffing.

Action: Commission Approval

Presenter: Josie Ahrens

Attachments: 7g_26-0377_1_Summary_Sheet_STA_AC_Transit.pdf
7g_26-0377_2_MTC_Resolution_4529.pdf

7h. 26-0378 MTC Resolutions Nos. 3989, Revised, and 4505, Revised. Various revisions to the MTC Exchange and One Bay Area Grant (OBAG 3) Program for Bay Wheels extension.

Action: Commission Approval

Presenter: Thomas Arndt

Attachments: 7h_26-0378_1_Summary_Sheet_OBAG3_Exchange.pdf
7h_26-0378_2_MTC_Resolution_4505.pdf
7h_26-0378_3_MTC_Resolution_3989.pdf

Committee Reports

8. Administration Committee Report (Papan)

8a. 26-0375 MTC Resolution No. 4751. Authorization of MTC Operating Reserve Policy.

Action: Commission Approval

Presenter: Grace Martinez

Attachments:
- 8a_26-0375_1_Summary_Sheet_Update_to_Commission.pdf
- 8a_26-0375_2_MTC_Resolution_4751_Updated.pdf
- 8a_26-0375_3_Summary_Sheet_Operating_Reserve_Policy.pdf
- 8a_26-0375_4_MTC_Resolution_4751.pdf
- 8a_26-0375_5_Presentation_MTC_Operating_Reserve_Policy_03.11.2026.pdf

9. Programming and Allocations Committee Report (Fleming)

9a. 26-0379 MTC Resolution No. 4743. Adoption of the Fiscal Year 2025-26 Productivity Improvement Program (PIP).

Final update on operator progress toward Senate Bill 125 Regional Accountability Measures

Action: Commission Approval

Presenter: Shruti Hari

Attachments:
- 9a_26-0379_1_Summary_Sheet_PIP_SB_125.pdf
- 9a_26-0379_2_Attachment_A_SB_125_Regional_Accountability_Update.pdf
- 9a_26-0379_3_MTC_Resolution_4743.pdf
- 9a_26-0379_4_Presentation_FY26_PIP_and_SB_125_Regional_Accountability

10. Planning Committee Report (Ahn)

10a. 26-0409 Final Plan Bay Area 2050+ (Consolidated Slide Deck for items 10b through 10e)

Overview of the regional plan for transportation, housing, economic development, and environmental resilience under development since mid-2023, including revisions made based on feedback during the final round of public engagement.

Action: Information

Presenter: Dave Vautin

Attachments:
10a_Consolidated_Presentation_Draft_Final_PBA_2050_Plus.pdf
10a_Attachment_A1_Public_Comment_Summary-draft-Final_PBA_2050_+.pdf
10a_Attachment_A2_Public_Comment_Summary-draft-Final_PBA_2050_+_Re
10a_Attachment_B1_Public_Comment_Summary-draft-Final_PBA_2050_+.pdf
10a_Attachment_B2_Public_Comment_Summary-draft-Final_PBA_2050_+_Re
10a_Attachment_C1_Public_Comment_Summary-draft-Final_PBA_2050_+.pdf
10a_Attachment_C2_Public_Comment_Summary-draft-Final_PBA_2050_+_Re
10a_Attachment_D1_Public_Comment_Summary-draft-Final_PBA_2050_+.pdf
10a_Attachment_D2_Public_Comment_Summary-draft-Final_PBA_2050_+_Re

10b. 26-0381 MTC Resolution No. 4748. Transportation Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program

Adoption of MTC Resolution No. 4748 approving the Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program (TIP).

Action: Commission Approval

Presenter: Dave Vautin

Attachments:
10b_26-0381_1_Summary_Sheet_Trans-Air_Quality_Conformity_Analysis-PBA
10b_26-0381_2_MTC_Resolution_4748.pdf
10b_26-0381_3_MTC_Resolution_4748_Attachment_A_Trans-Air_Quality_Cor

10c. 26-0382 MTC Resolution No. 4749. Certification of Final Plan Bay Area 2050+ Environmental Impact Report, adoption of CEQA Findings, Statements of Overriding Considerations, and Mitigation Monitoring and Reporting Program

Adoption of MTC Resolution No. 4749 certifying the Final Plan Bay Area 2050+ Environmental Impact Report, adopting the CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program.

Action: Commission Approval

Presenter: Dave Vautin

Attachments:
10c_26-0382_0_Cover_Adoption_of_MTC_Resolution_4749.pdf
10c_26-0382_1_Summary_Sheet_Final_PBA_2050_+_EIR.pdf
10c_26-0382_2_MTC_Resolution_4749.pdf
10c_26-0382_3_MTC_Res_4749_Attachment_A_Final_EIR_PBA_2050_+.pdf
10c_26-0382_4_MTC_Res_4749_Attachment_B_CEQA_Findings_PBA_2050_
10c_26-0382_5_MTC_Res_4749_Attachment_C_MMRP_PBA_2050_+.pdf

10d. 26-0383 MTC Resolution No. 4750. Final Plan Bay Area 2050+

Adoption of MTC Resolution No. 4750 approval the Final Plan Bay Area 2050+.

Action: Commission Approval

Presenter: Dave Vautin

Attachments:
10d_26-0383_1_Summary_Sheet_Final_PBA_2050+.pdf
10d_26-0383_2_Attachment_A_Final_PBA_2050_+.pdf
10d_26-0383_3_MTC_Resolution_4750_Final_PBA_2050_+.pdf
10d_26-0383_4_MTC_Resolution_4750_Attachment_A_Final_PBA_2050_+.pd

10e. 26-0384 MTC Resolution No. 4646, Revised. 2025 Transportation Improvement Program (TIP) Amendment 2025-28

Adoption of MTC Resolution No. 4646, Revised, approving TIP Amendment 2025-28.

Action: Commission Approval

Presenter: Dave Vautin

Attachments:
10e_26-0384_1_Summary_Sheet_2025_TIP_Amendment_2025-28.pdf
10e_26-0384_2_MTC_Resolution_4646.pdf
10e_26-0384_3_Attachment_B_TIP_Revision_Summary_2025-28.pdf
10e_26-0384_4_Attachment_C_Proposed_ID_Updates-Projects-2025_TIP_to_

11. Commission Information

11a. 26-0252 Next-Generation Clipper Update

Update on the Next-Generation Clipper system, highlighting the program's background and development history, as well as implementation progress of the new account-based platform and transitioning current Clipper users.

Action: Commission Information

Presenter: Jason Weinstein, MTC

Attachments:
11a_26-0252_1_Summary_Sheet_Next_Generation_Clipper_Update_v8.pdf
11a_26-0252_2_Attachment_A_Next_Gen_Clipper_Background_Document_v5
11a_26-0252_3_Attachment_B_Next-Generation_Clipper_Update v4.pdf

12. Public Comment / Other Business

*Commissioners and members of the public participating by Zoom wishing to speak should use the "raise hand" feature or dial *9. When called upon, unmute yourself or dial *6.*

13. Adjournment / Next Meetings:

The next regular meeting of the Metropolitan Transportation Commission is scheduled to be held at the Bay Area Metro Center, 375 Beale Street, San Francisco on April 22, 2026. Any changes to the schedule will be duly noticed to the public.

Public Comment: The public is encouraged to comment on agenda items at Commission meetings by completing a request-to-speak card (available from staff) and passing it to the Commission secretary. Public comment may be limited by any of the procedures set forth in Section 3.09 of MTC's Procedures Manual (Resolution No. 1058, Revised) if, in the chair's judgment, it is necessary to maintain the orderly flow of business.

Meeting Conduct: If this meeting is willfully interrupted or disrupted by one or more persons rendering orderly conduct of the meeting unfeasible, the Chair may order the removal of individuals who are willfully disrupting the meeting. Such individuals may be arrested. If order cannot be restored by such removal, the members of the Commission may direct that the meeting room be cleared (except for representatives of the press or other news media not participating in the disturbance), and the session may continue.

Record of Meeting: Commission meetings are recorded. Copies of recordings are available at a nominal charge, or recordings may be listened to at MTC offices by appointment. Audiocasts are maintained on MTC's Web site (mtc.ca.gov) for public review for at least one year.

Accessibility and Title VI: MTC provides interpreter services/ADA accommodation upon request to persons with disabilities and individuals with limited-English proficiency who wish to address Commission matters. To request accommodation, please call (415) 778-6757. For TDD/TTY, call 711 and ask to be relayed to (415) 778-6700. We request at least three working days' notice to accommodate your request.

Acceso y el Titulo VI: La MTCproporciona servicios de interprete/asistencia del ADA solo con solicitarlo a las personas con discapacidades o las personas con conocimiento limitado del inglés que quieran dirigirse a la Comisión. Para solicitar asistencia,llame al (415) 778-6757. Para servicios TDD/TTY, llame al 711 y pida que lo conecten al (415) 778-6700. Le pedimos solicitar asistencia con tres días hábiles de anticipación.

無障礙及《民權法：第六章》措施：大都會交通委員會（MTC）會根據要求，為想了解委員會事務的殘障人士或英語能力有限的民眾，提供口譯/手語翻譯服務。如果您需要相關的無障礙語言服務，請致電 (415) 778-6757，如需使用TDD/TTY，請撥打 711 並請求轉接至 (415) 778-6700。為確保能夠為您提供符合需求的安排，請至少提前三個工作日通知我們。

Attachments are sent to Commission members, key staff and others as appropriate. Copies will be available at the meeting.

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0358, **Version:** 1

Subject:
Executive Director's Report

Presenter:
Andrew Fremier

Recommended Action:
Information

EXECUTIVE DIRECTOR'S REPORT

Metropolitan Transportation Commission

March 25, 2026

Personnel

Departures

Suzanne Childress – Suzanne started in March 2025 as a Principal Planner/Analyst. Her last day with MTC was March 6 as a Principal Planner/Analyst in the Regional Planning Programs section.

Kenzi Anzai – Kenzi started in January 2022 as an Assistant Planner/Analyst. His last day with MTC was March 6 as a Planner/Analyst III in the Funding Policy and Programs section.

New Appointments

Michael Alves – Michael started on March 16 as a Program Coordinator III with the Clipper section.

Updates

Caltrain Names Train in Speaker Emeritus Nancy Pelosi's Honor

On Sunday, March 22 Commissioners Burt, Abe-Koga and Melgar joined other local, state and national leaders at a Caltrain ceremony celebrating the naming of one of its state-of-the-art electric trains in honor of Speaker Emerita Nancy Pelosi at Caltrain's San Francisco Station. Made during Women's History Month, the dedication recognized Pelosi for her outsized role in advocating for Caltrain and other public transit agencies throughout her career as she nears the end of her final term in Congress after serving for 38 years.

CalEnviroScreen 5.0 Released

CalEnviroScreen (CES) is a statewide tool used to identify Disadvantaged Communities (DACs) based on cumulative environmental and population burdens. CES guides eligibility for several state funding programs. The recent draft release of CES 5.0

incorporates updated census data and two new indicators, resulting in a modest statewide expansion of DACs.

In the Bay Area, DAC-designated census tracts increased from 113 to 122; however, this update does not materially change the region's representation. Only 6.9% of Bay Area tracts qualify as DACs under the draft CES 5.0, compared to 29% statewide. Under the proposed CES 5.0 the region accounts for just 5.4% of all DACs, compared to 5.8% in CES 4.0. As a result, many Bay Area communities with significant socioeconomic and environmental challenges remain underrepresented, limiting access to state discretionary funding tied to CES.

Staff are currently working on a comment letter for submittal to the California Office of Environmental Health Hazard Assessment (OEHHA) in advance of the April 1, 2026 comment deadline. Staff will continue to monitor the CES update process and work with regional and state partners to advocate for a definition of DACs that better reflect the full range of disadvantages in the Bay Area. A more detailed update on CalEnviroScreen is planned for next month's joint meeting of the MTC Planning and ABAG Administrative Committees.

Sacramento Lobby Days

On March 17 and March 18, Chair Noack, Vice Chair Moulton-Peters, Commissioners Ahn, Ezzy-Ashcraft, John-Baptiste, Papan and ABAG President (& Commissioner) Ramos and ABAG Executive Board member Motoyama met with members of the Bay Area legislative delegation to discuss our 2026 legislative priorities. Over the two-day period, we focused on three legislative priorities: 1) protecting transit and housing investments in the FY 2026-27 State Budget; 2) seeking $15 million to one-time funds to sustain the Bay Area Housing Finance Authority's programs; and 3) supporting SB 1087 (Cabaldon), the MTC-ABAG sponsored legislation to modernize SB 375, the law requiring sustainable communities strategies.

State Partners Visit MTC-ABAG

On Thursday, April 9, state partners from the California Transportation Commission, California Air Resources Board and California Department of Housing and Community Development are holding a joint meeting at the Bay Area Metro Center at 1 p.m. We have arranged a tour of the Oakland Chinatown Transit Oriented Development project located at the Lake Merritt BART station – a project that is the result of an MTC-funded station area plan and predevelopment loan from BAHFA. The project has received state and regional funding and exemplifies the region's efforts to expand

access to affordable housing near public transit. This is an opportunity to discuss the important role MTC-ABAG plays in supporting both the planning and implementation of projects to implement sustainable communities strategies and the need for additional flexible regional funding.

El Cerrito Plaza BART TOD Groundbreaking Update

On March 5, Chair Noack, ABAG Housing Committee Vice Chair Lisa Motoyama, Chief Deputy Executive Director Alix Bockelman, Deputy Executive Director Daniel Saver and I joined Related Companies of California, BART officials, and many other local and state leaders for the groundbreaking ceremony for Parcel A South of the El Cerrito Plaza BART TOD project. Chair Noack shared a few words on behalf of BAHFA, who provided a $2.4 million Priority Sites pre-development loan using Regional Early Action Planning grant funding early in the process, helping the project attract additional dollars. This project is 100% affordable and will include 70 units, part of a broader master plan which will include about 750 units, of which 47% will be affordable.

Doorway Receives Regional Excellence Award

BAHFA's Doorway Housing Portal received a Eureka! Award for Regional Excellence from the California Association of Councils of Governments (CALCOG) during the organization's Regional Leadership Forum in Long Beach on March 9. The Eureka! Award recognizes regional programs that demonstrate the type of creative leadership and thinking needed to solve tough regional challenges and can serve as examples for other regions to follow. The Doorway Housing Portal, launched in 2023, is the first multi-jurisdictional online affordable housing portal in the country and serves as a one-stop shop for searching and applying for affordable housing.

Standardized Transit Maps and Sign Designs Approved

The Regional Network Management (RNM) Council last month approved the first set of transit wayfinding design guides to help Bay Area transit agencies establish a uniform look for signs and maps used everywhere from individual bus stops across the region to major hubs where multiple systems connect. At major hubs, the guidelines include maps illustrating how to access key destinations in the area, such as libraries and community centers. The RNM Council's action finalizes the region's new transit network identity and offers transit stop sign guidelines that MTC and agencies can use in the near-term while guidance for all transit stops and stations is refined and finalized. (https://mtc.ca.gov/news/bay-area-transit-agency-leaders-ok-standardized-sign-designs)

Applications Open for Norman Mineta High School Academy

Please help spread the word that applications are open for the 2026 Norman Mineta Bay Area High School Academy, a paid summer program designed to introduce young people to careers in public service and regional leadership. This four-week academy offers students a chance to explore how decisions about transportation, housing, air quality and environmental justice shape everyday life in the Bay Area. Space is limited, and applications must be submitted by Monday, April 27, at 10 p.m.

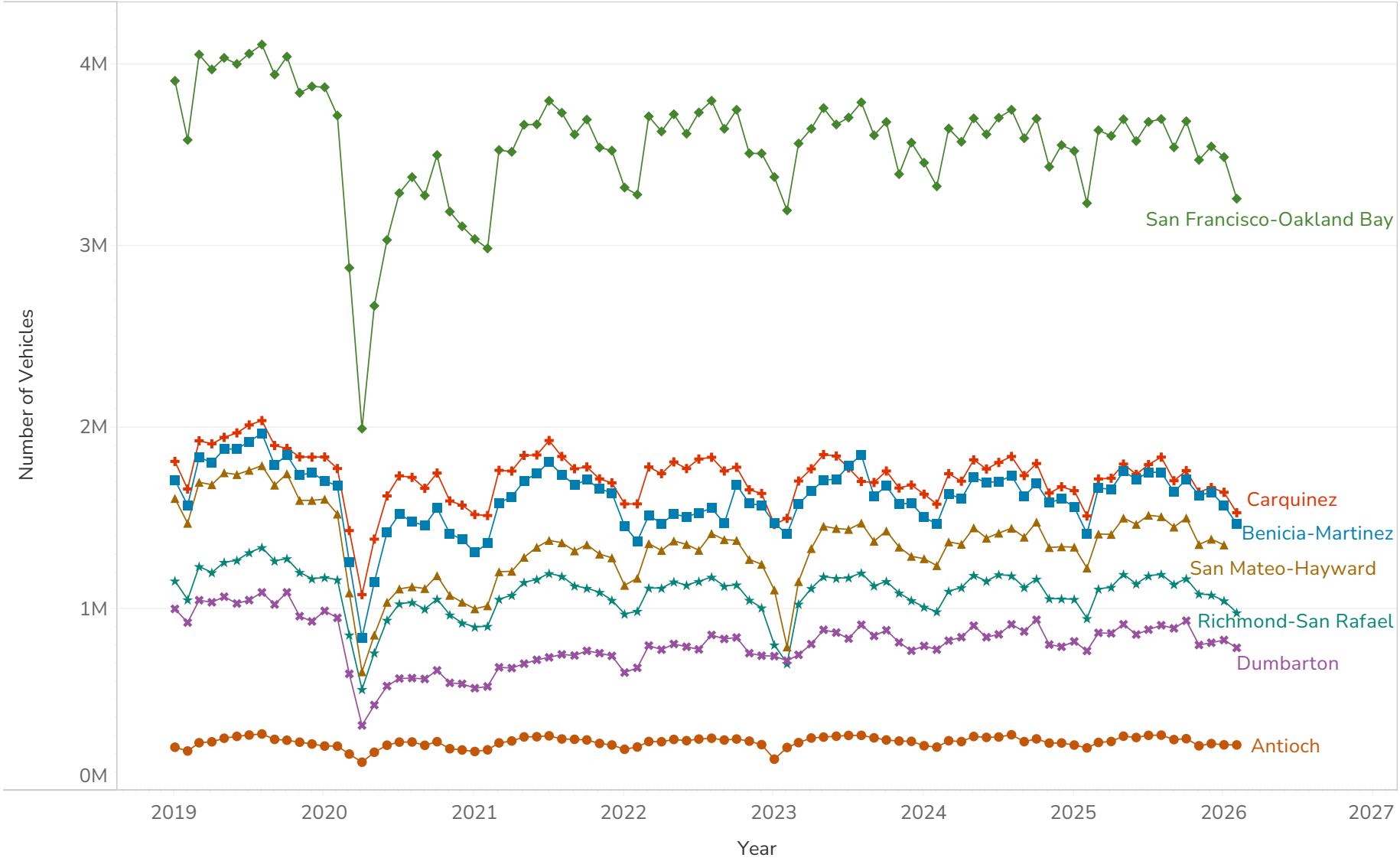
Andrew B. Fremier

METROPOLITAN TRANSPORTATION COMMISSION

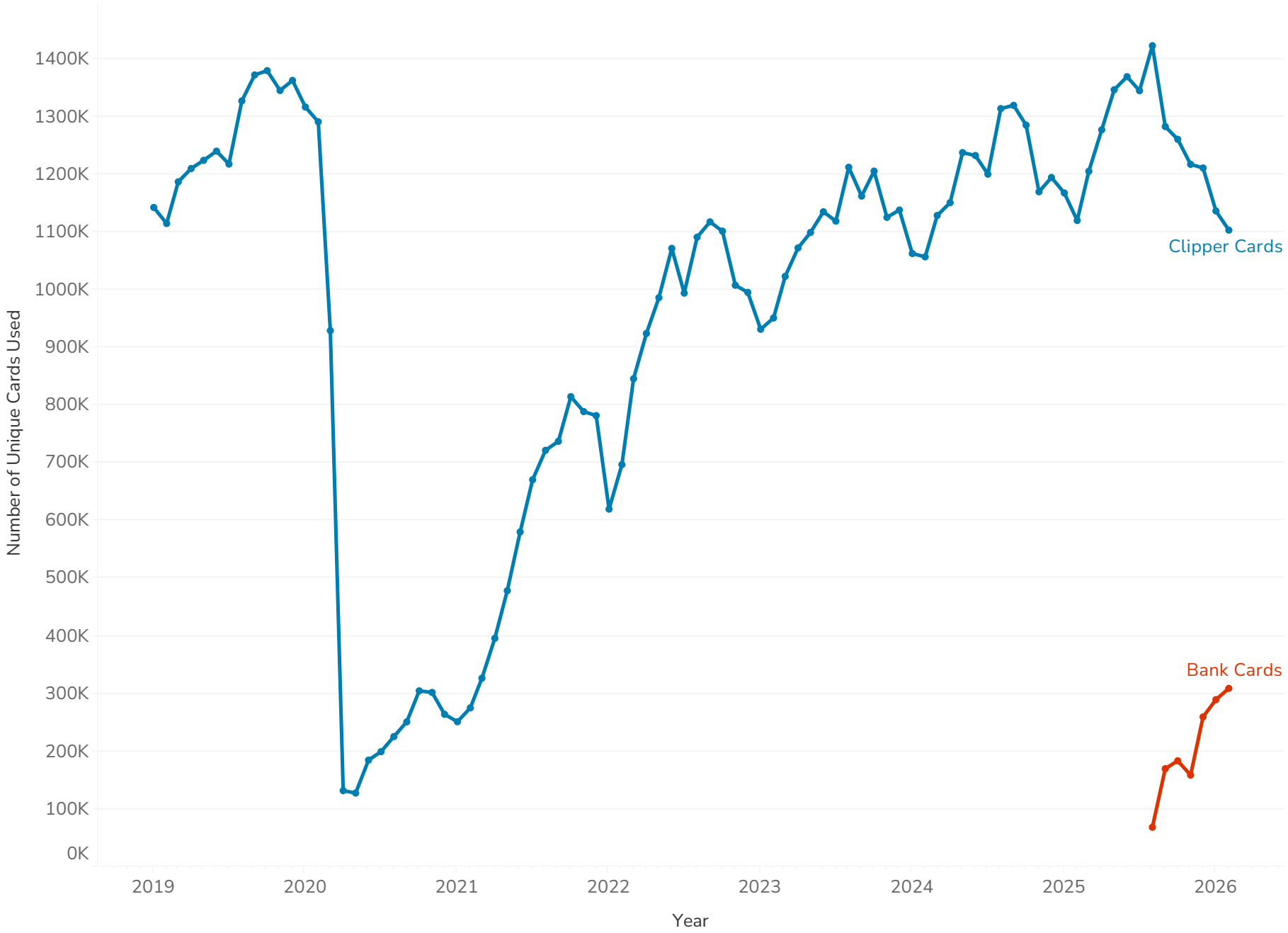
Monthly MTC Operational Statistics as of March 13, 2026

Source: MTC. To access data, visit the Monthly Transportation Statistics webpage at https://mtc.ca.gov/tools-resources/data-tools/monthly-transportation-statistics or contact info@bayareametro.gov.

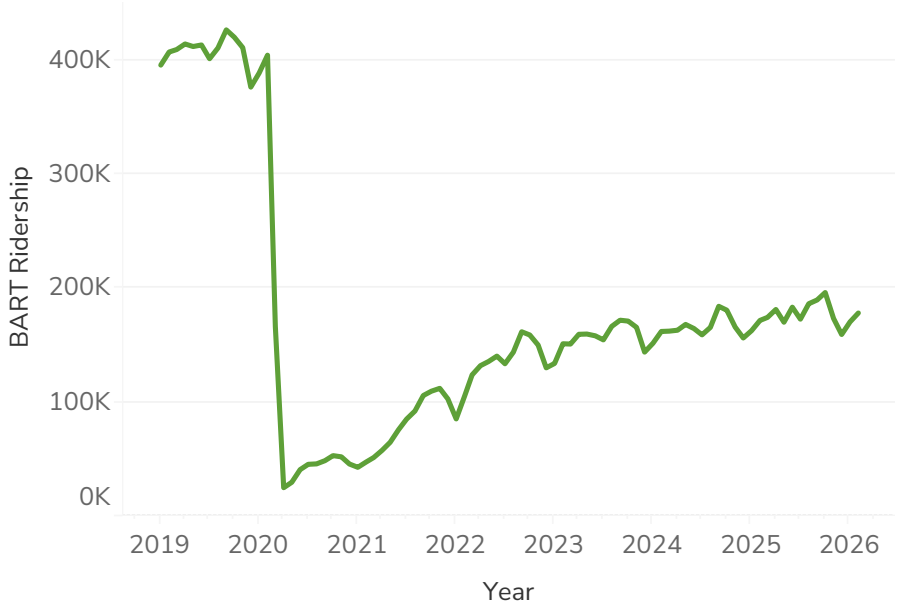
Monthly Bay Area Bridge Crossings



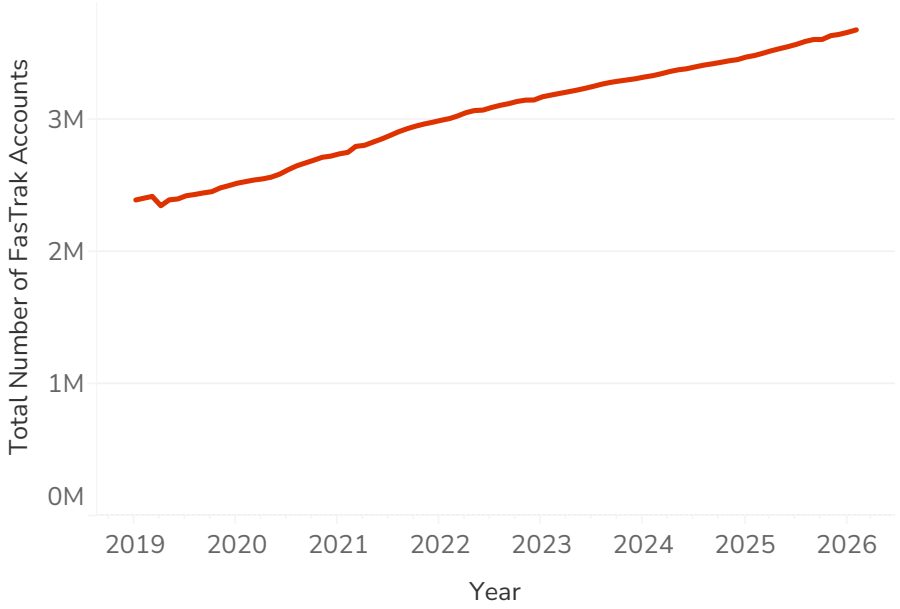
Monthly Unique Cards Used on Bay Area Transit



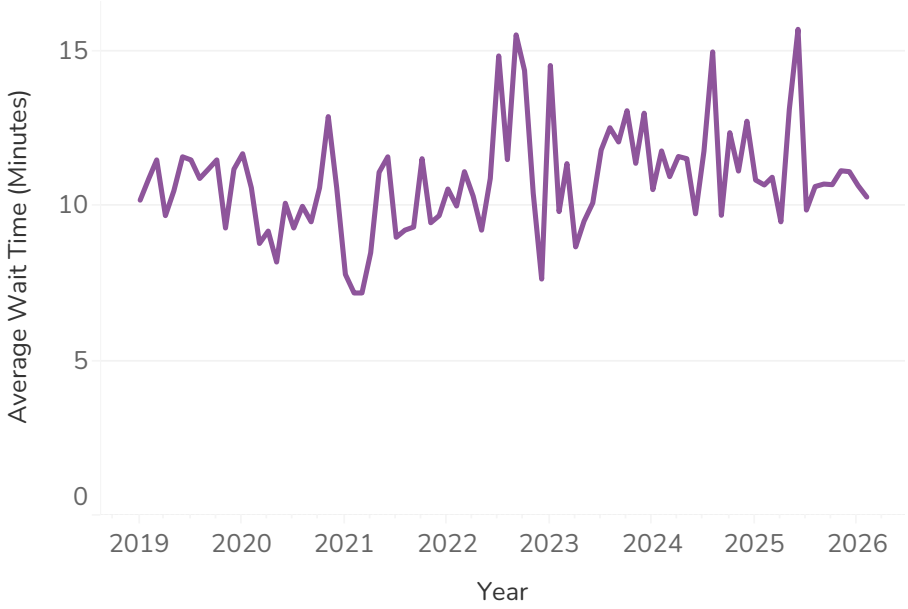
Number of Average Weekday BART Station Exits



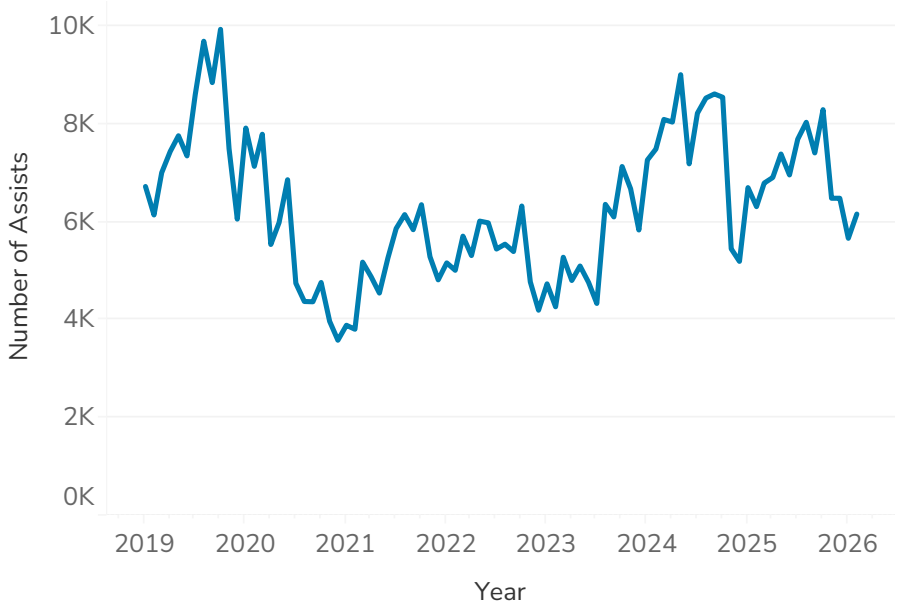
Cumulative Number of FasTrak Accounts



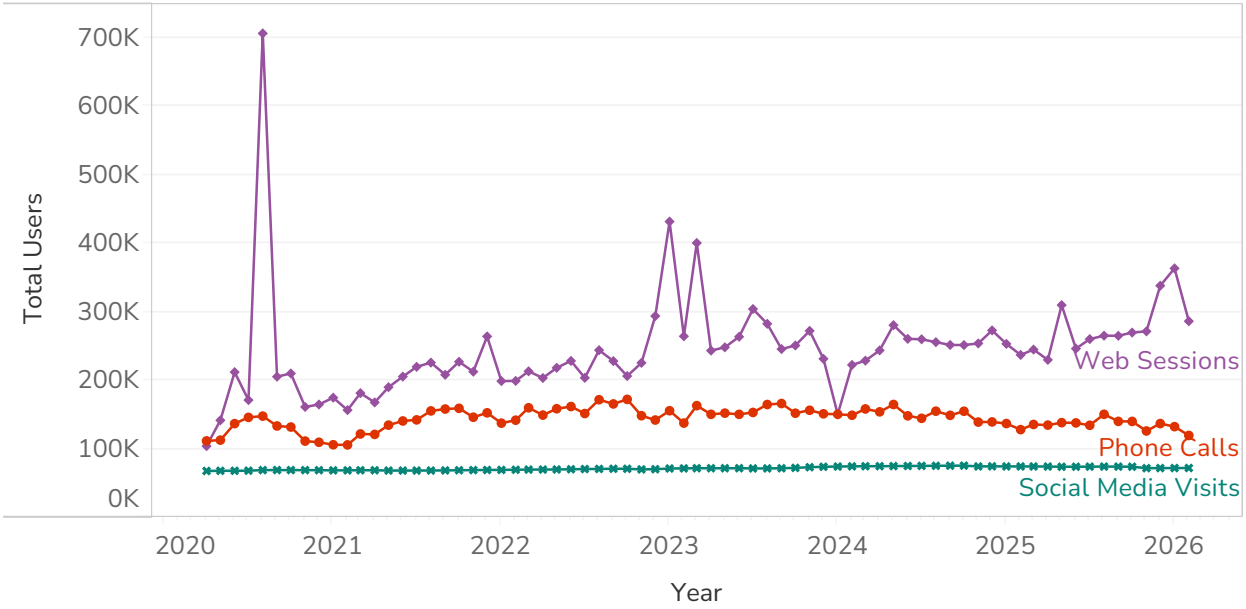
Monthly Freeway Service Patrol Average Wait Time



Monthly Freeway Service Patrol Number of Assists

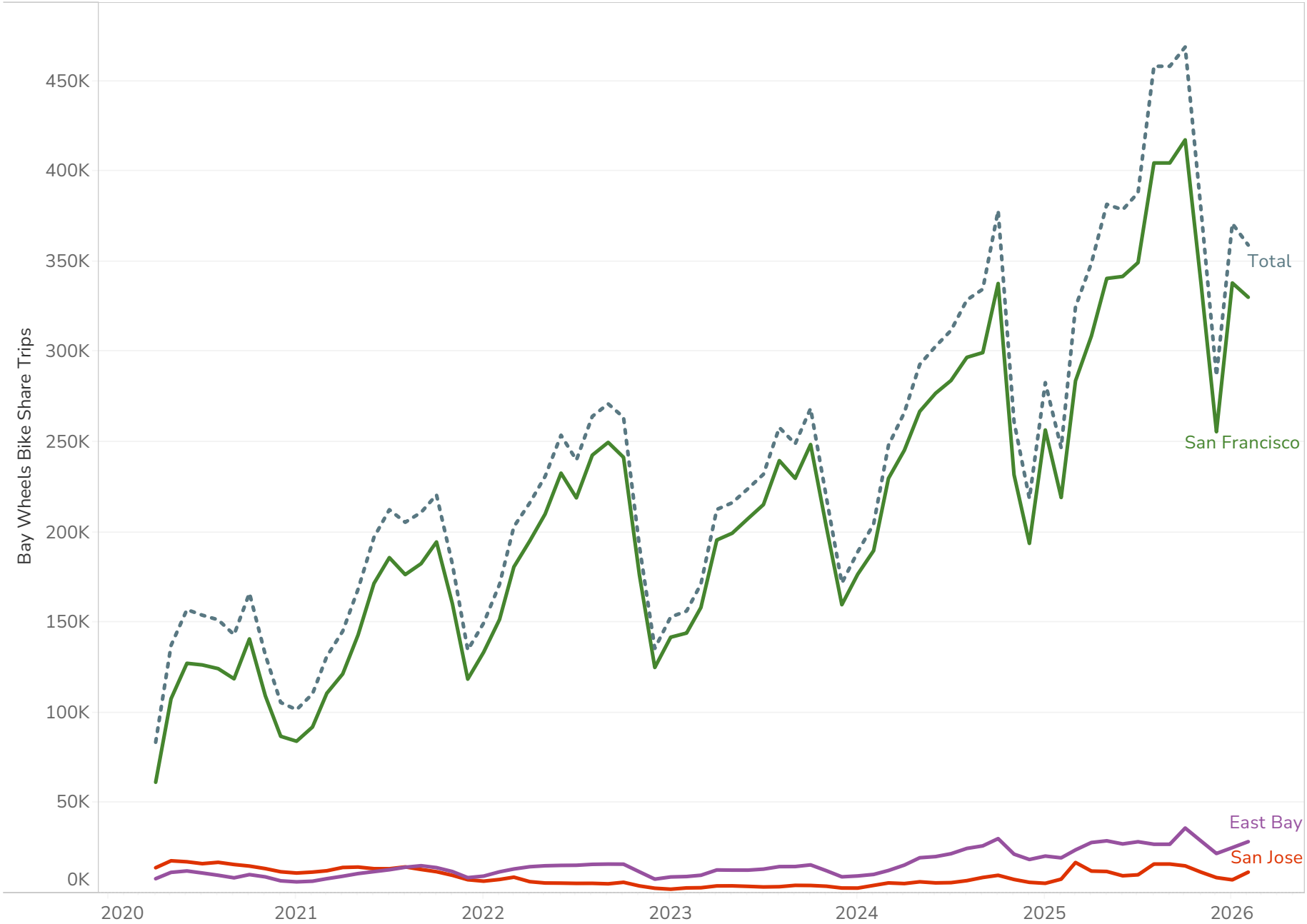


Monthly 511 Users from Different Platforms



Monthly 511 API Users

Monthly Bay Wheels Bike Share Trips



375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0359, **Version:** 1

Subject:
Approval of the Commission Minutes of the February 25, 2026 meeting

Recommended Action:
Commission Approval

Bay Area Metro Center
375 Beale Street
San Francisco, CA 94105

Meeting Minutes

Metropolitan Transportation Commission

Sue Noack, Chair *Stephanie Moulton-Peters, Vice Chair*

Wednesday, February 25, 2026 **9:35 AM** **Board Room - 1st Floor**

Roster:
Sue Noack (Chair), Stephanie Moulton-Peters (Vice Chair),
Margaret Abe-Koga, Eddie Ahn, David Ambuehl*, Candace Andersen,
Marilyn Ezzy Ashcraft, Pat Burt, Noelia Corzo, Victoria Fleming,
Dorene M. Giacopini*, Alicia John-Baptiste, Barbara Lee, Matt Mahan,
Amber Manfree, Mitch Mashburn, Myrna Melgar, Nate Miley, Gina Papan,
Belia Ramos, Libby Schaaf*
***Non-Voting Members**

Chair Noack called the meeting to order at approximately 9:37 a.m.

1. Call to Order / Roll Call / Confirm Quorum

Present: 17 - Commissioner Abe-Koga, Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Corzo, Commissioner Fleming, Commissioner John-Baptiste, Commissioner Lee, Commissioner Manfree, Commissioner Mashburn, Commissioner Melgar, Commissioner Miley, Vice Chair Moulton-Peters, Chair Noack, Commissioner Papan, and Commissioner Ramos

Absent: 1 - Commissioner Mahan

Commissioner Corzo arrived during agenda item 5a.
Commissioner Melgar arrived during agenda item 8a.
Commissioner John-Baptiste arrived during agenda item 8c.
Commissioner Miley arrived during agenda item 9a.
Commissioner Schaaf left during agenda item 9a.

Non-Voting Commissioner Present: Commissioner Schaaf
Non-Voting Commissioners Absent: Commissioner Ambuehl and Commissioner Giacopini

2. Pledge of Allegiance / Acknowledgement of the Flag

3. Compensation Announcement (Clerk)

4. Chair's Report

5. Executive Director's Report

5a. 26-0197 Executive Director's Report

Action: Information

Presenter: Andrew Fremier

Commissioner Corzo arrived during agenda item 5a.

6. Commissioner Comments

7. Consent Calendar

Upon the motion by Commissioner Andersen and seconded by Vice Chair Moulton-Peters, the Commission unanimously approved the Consent Calendar by the following vote:

Aye: 14 - Commissioner Abe-Koga, Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Corzo, Commissioner Fleming, Commissioner Lee, Commissioner Manfree, Commissioner Mashburn, Vice Chair Moulton-Peters, Chair Noack, Commissioner Papan and Commissioner Ramos

Absent: 4 - Commissioner John-Baptiste, Commissioner Mahan, Commissioner Melgar and Commissioner Miley

7a. 26-0198 Approval of the Commission Minutes of the January 28, 2026 meeting

Action: Commission Approval

Programming and Allocations Committee (Commission Consent)

7b. 26-0199 MTC Resolution Nos. 3989, Revised, and 4505, Revised. Various revisions to the MTC Exchange and One Bay Area Grant (OBAG 3) Program.

Action: Commission Approval

Presenter: Thomas Arndt

7c. 26-0200 MTC Resolution Nos. 4584, Revised; 4595 Revised; and 4731, Revised. Allocation of $4.3 million in Regional Measure 3 Capital Funds to Contra Costa County and the Solano Transportation Authority (STA), and a rescission of $2.7 million in RM3 Capital Funds for STA.

Action: Commission Approval

Presenter: Karl Anderson

7d. 26-0203 MTC Resolution No. 4744, Revised. Adoption of the 2027 Regional Active Transportation Program (ATP) Cycle 8 Guidelines.

Action: Commission Approval

Presenter: Karl Anderson

7e. 26-0243 MTC Resolution No. 4646, Revised. 2025 Transportation Improvement Program (TIP) Amendment 2025-27.

Action: Commission Approval

Presenter: John Saelee

Regional Network Management Committee (Commission Consent)

7f. 26-0205 MTC Resolution No. 4610, Revised. Regional Network Management Customer Advisory Group Charter - New Member Appointments

Action: Commission Approval

Presenter: Jose Ahrens

Committee Report

8. Programming and Allocations Committee Report (Fleming)

8a. 26-0202 MTC Resolution No. 4742. FY2026-27 MTC Fund Estimate.

Annual Fund Estimate and proposed apportionment and distribution of approximately $1 billion in Transportation Development Act (TDA) Local Transportation Fund, State Transit Assistance (STA), State of Good Repair (SGR) Program, Assembly Bill 1107 (AB 1107), transit related bridge toll, and Low Carbon Transit Operations Program (LCTOP) funds for FY2026-27.

Action: Commission Approval

Presenter: Luis Garcia

Commissioner Melgar arrived during agenda item 8a.

Upon the motion by Commissioner Fleming and seconded by Commissioner Melgar, the Commission adopted MTC Resolution No. 4742. The motion carried by the following vote:

Aye: 15 - Commissioner Abe-Koga, Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Corzo, Commissioner Fleming, Commissioner Lee, Commissioner Manfree, Commissioner Mashburn, Commissioner Melgar, Vice Chair Moulton-Peters, Chair Noack, Commissioner Papan and Commissioner Ramos

Absent: 3 - Commissioner John-Baptiste, Commissioner Mahan and Commissioner Miley

8b. 26-0201 MTC Resolution No. 4604, Revised. MTC Community Action Resource and Empowerment (CARE) - Community-Based Transportation Plan Project Development Technical Assistance (CBTP TA).

Revisions to the MTC Community Action Resource and Empowerment (CARE) guidelines to establish county-level funding amounts for CBTP TA and update the program guidelines. Staff will also provide an overview of the Participatory Budgeting component of CARE including anticipated next steps in framework development.

Action: Commission Approval

Presenter: Janica Mendillo

Upon the motion by Commissioner Fleming and seconded by Commissioner Ashcraft, the Commission unanimously adopted MTC Resolution No. 4604, Revised. The motion carried by the following vote:

Aye: 15 - Commissioner Abe-Koga, Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Corzo, Commissioner Fleming, Commissioner Lee, Commissioner Manfree, Commissioner Mashburn, Commissioner Melgar, Vice Chair Moulton-Peters, Chair Noack, Commissioner Papan and Commissioner Ramos

Absent: 3 - Commissioner John-Baptiste, Commissioner Mahan and Commissioner Miley

8c. 26-0204 MTC Resolution Nos. 4505, Revised, and 4740, Revised. Revisions to the One Bay Area Grant (OBAG 3 and 4) programs.

Revisions to the One Bay Area Grant (OBAG 3 and 4) programs, including establishing additional OBAG 4 policies and procedures and programming a total of $81 million in OBAG 4 funds to MTC for planning and implementation activities by County Transportation Agencies (CTAs) ($41 million) and MTC ($40 million).

Action: Commission Approval

Presenter: Thomas Arndt

Commissioner John-Baptiste arrived during agenda item 8c.

Written correspondence was received from BART.

Upon the motion by Commissioner Fleming and seconded by Commissioner Melgar, the Commission unanimously adopted MTC Resolution Nos. 4505, Revised, and 4740, Revised. The motion carried by the following vote:

Aye: 16 - Commissioner Abe-Koga, Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Corzo, Commissioner Fleming, Commissioner John-Baptiste, Commissioner Lee, Commissioner Manfree, Commissioner Mashburn, Commissioner Melgar, Vice Chair Moulton-Peters, Chair Noack, Commissioner Papan and Commissioner Ramos

Absent: 2 - Commissioner Mahan and Commissioner Miley

9. Commission Approval

9a. 26-0206 Transit-Oriented Communities (TOC) Incentive Program

Overview of the proposed $45 million TOC Incentive Program as part of One Bay Area Grant (OBAG) Cycle 4, including the TOC Evaluation Framework

Action: Commission Approval

Presenter: Gillian Adams

Commissioner Miley arrived at the beginning of agenda item 9a and Commissioner Schaaf left towards the end agenda item 9a.

Written correspondence was received from: Augie Marques, Andrew Lomano, Billy Reed, Brian Boisson, Bryce Cook, Catherine Vallee, Christina Roma Leffman, City of San Jose (Directors Burton, Ristow, and Solivan), City of Antioch (City Manager, Bessie M. Scott), Debbie Wong, Diana Tjin, Diana LoVerde, Gualdino Martins, East Bay Leadership Council (Mark Orcutt), Ed Kantz, Ed Stoneham, Felix Schuda, San Francisco Home Life, Inc. (Frank Vella), Grace Alicea, Frank Vento, Jaideep Gambhir, John DeBell, JK Global Real Estate Consultant (Karim Sarraf), Linda Crose-Andersen, Lizza Vernazza, Maggie Chen, South Bay Home Rental (Marcus Teixeira), Marcy and Tom Lauck, Maria Silvestri, Mary Nobriga, Marylene Notarianni, Melanie M Brayton, Mike Zojaji, Napa County Bicycle Coalition (Kara Vernor), Neema Hekmat, Nicole Hosemann, Remi Tan, Salil Shetye, San Mateo County Association of Realtors (Fernando Pena), SPUR and Seamless Bay Area Joint Letter, Shannon Bergman, Stephanie Sills, Steve Kelly, Susan Liedstrand, Tam Le, Timothy S. O'Hara, Toryn Rizzo, City of Cotati (Mayor Sylvia Lemus), 2 Separate Coalition Letters, Jay and Trish Gertridge, and SAMCEDA (Don Cecil).

The following members of the public were called upon to speak in the Board Room: Anil Babbar (California Apartment Association), Jack Lin, Bill Espinola, David Stark (Bay East Association of Realtors), Jennifer Rizzo, Jenal Lockwood (Santa Clara County Association of Realtors), Margaret Stern (East Bay Leadership Council), Sandy Sicsko (Santa Clara County Association of Realtors), Amy Mendez, Casper Leung, Meina Young (Business and Housing Network), Jane Lee (Business and Housing Network), Greg Peratta, Dennis War (Santa Clara County Association of Realtors), Danvi Dubey (Santa Clara County Association of Realtors), Warren Cushman, Gina Zari (Santa Clara County Association of Realtors), AnaMaria Russo (Santa Clara County Association of Realtors), Cheryl L., Zack Deutsch-Gross (TransForm), Michael DeCecco, Neil Collins, Michael Gordon, Enrique Navarro, W. Gene Herat, Rhovy Lyn Antonio (California Apartment Association), Jenny Zhao, Joyce Lin, Cade Cannedy (Climate Resilient Community), Emily Wheeler (Public Advocates), Amanda Chang, Amiel Leano Atanacio, Kristen Hackett (My Eden Voice), Jeff Podraza (Santa Clara County Association of Realtors), Frank Caveile (Santa Clara County Association of Realtors), Joseph Weinstein, Meg Heisler, Jordan Grimes (Greenbelt Alliance), Lyndsay Wright (Mobile Homeowners Unite), Suzanne Drake, Marianne Posberg, Tano Trachtenberg, Jack Fleck (350 Bay Area), Kit Yung Chang (Bay Area Housing Network), Shirley Wang (Bay Area Housing Network), Grace Lai (Bay Area Housing Network), Winnie Fung (Bay Area Housing Network), Larry Lee, and Ken Chan (Housing Leadership Council).

The following members of the public were called upon to speak in the Zoom:

Suzanne Moor (Health Care for Homeless and Farm Workers Program of San Mateo), Mark (East Bay Leadership Council), Tyran (Bay East Association of Realtors), Anne Olivia, Guest 532998, Dawn Kalmodo, Paul, Paul Campos, Adina Levin, Noah House, Jaime (Icon Perspective), Fernando Pena (San Mateo County Association of Realtors), Annie K. (East Bay Young Democrats), Peter Pan (Bay Area Housing and Business Network), Mak, Nicholas, Marie, Igor Trago (City of Berkeley), Ma Kai Freeman, Karen Grove (Menlo Together), Shanty Singh (Tenants Together), Jenny Madsen, Max, Gia (Housing Choices), Aaron, Diane Flesher (Santa Clara County Association of Realtors), Kelly Hunt (Santa Clara County Association of Realtors), Winnie Funding, Francisco Papalia, Aaliyah Gomez (Marin Association of Realtors), Benjamin (Center for Independence of Individuals with Disabilities), Rebecca Matrix Ravitch, Tuan, Cecelia Luna Para, Paul, Tina Wong (BetterHousingPolicy.Org), and Sunjay Shepherd.

Upon the motion by Commissioner Melgar and seconded by Commissioner Lee, the Commission adopted Option 1 with an amendment directing staff to return with additional information about technical assistance efforts and clarification that no protection policy is given preference over another — all are evaluated on an equal basis. The protection policy options are intended to reduce displacement and ensure that existing residents benefit from transit-oriented growth; however, implementation of any option is subject to feasibility and alignment with the applicable policies, regulatory framework, and broader community considerations of the local jurisdiction, and should not be construed as expressing support for any particular approach. The motion carried by the following vote:

Aye: 12 - Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Corzo, Commissioner Fleming, Commissioner John-Baptiste, Commissioner Lee, Commissioner Manfree, Commissioner Melgar, Vice Chair Moulton-Peters, Chair Noack and Commissioner Ramos

Nay: 5 - Commissioner Abe-Koga, Commissioner Burt, Commissioner Mashburn, Commissioner Miley and Commissioner Papan

Absent: 1 - Commissioner Mahan

10. Commission Information

10a. 26-0252 Next-Generation Clipper Update

Update on the Next-Generation Clipper system, highlighting the program's background and development history, as well as implementation progress of the new account-based platform and transitioning current Clipper users.

Action: Commission Information

Presenter: Jason Weinstein, MTC

Agenda item 10a was deferred.

11. Closed Session

11a. 26-0239 Closed Session / Public Comment

Adina Levin and Alex Miller were called to speak for Closed Session Public Comment.

11b. 26-0240 PUBLIC EMPLOYEE PERFORMANCE EVALUATION
Titles: Executive Director, General Counsel

CONFERENCE WITH LABOR NEGOTIATORS
Agency designated representatives: Sue Noack and Stephanie Moulton-Peters

Unrepresented Employees: Executive Director, General Counsel

The Commission met in Closed Session, pursuant to Government Code §54957, with respect to the Executive Director's and General Counsel's performance and compensation range of non-represented employees. Neither the Executive Director nor General Counsel were present for discussions on compensation.

12. Open Session / Report out from Closed Session

The Commission returned to open session and the following Commissioners left at the conclusion of agenda item 11b: Abe-Koga, Corzo, Manfree, Melgar, Miley, and Papan.

12a. 26-0241 MTC Resolution No. 4369, Revised. Approval of the Executive Director's Performance Evaluation, associated compensation range and salary adjustment - final amount to be read into the record.

Action: Commission Approval

Alex Miller was called to speak for agenda item 12a.

Upon the motion by Commissioner Mashburn and seconded by Commissioner Andersen, the Commission adopted MTC Resolution No. 4369, Revised setting the salary of the Executive Director's to $420,433.73 effective January 1, 2025 and $420,433.73 effective January 1, 2026. The motion carried by the following vote:

Aye: 11 - Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Fleming, Commissioner John-Baptiste, Commissioner Lee, Commissioner Mashburn, Vice Chair Moulton-Peters, Chair Noack and Commissioner Ramos

Absent: 7 - Commissioner Abe-Koga, Commissioner Corzo, Commissioner Mahan, Commissioner Manfree, Commissioner Melgar, Commissioner Miley and Commissioner Papan

12b. 26-0242 MTC Resolution No. 4741. Approval of General Counsel's Performance Evaluation, associated compensation range and salary adjustment - final amount to be read into the record.

Action: Commission Approval

Alex Miller was called to speak for agenda item 12b.

Upon the motion by Commissioner Fleming and seconded by Commissioner Ahn, the Commission adopted MTC Resolution No. 4741, setting the salary of General Counsel to $392,174.43 effective January 1, 2025 and $418,842.32 effective January 1, 2026. The motion carried by the following vote:

Aye: 11 - Commissioner Ahn, Commissioner Andersen, Commissioner Ashcraft, Commissioner Burt, Commissioner Fleming, Commissioner John-Baptiste, Commissioner Lee, Commissioner Mashburn, Vice Chair Moulton-Peters, Chair Noack and Commissioner Ramos

Absent: 7 - Commissioner Abe-Koga, Commissioner Corzo, Commissioner Mahan, Commissioner Manfree, Commissioner Melgar, Commissioner Miley and Commissioner Papan

13. Public Comment / Other Business

Written correspondence was received for agenda item 13 from Mark Baker.

Aleta Dupree and Alex Miller were called to speak.

26-0350 Public Comment

14. Adjournment / Next Meetings:

The next regular meeting of the Metropolitan Transportation Commission is scheduled to be held at the Bay Area Metro Center, 375 Beale Street, San Francisco on March 25, 2026. Any changes to the schedule will be duly noticed to the public.

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0245, **Version:** 1

Subject:
MTC Resolution No. 4756. Resolution Authorizing the Use of Teleconference Meetings by the MTC ABAG Community Advisory Council and Making Related Findings

Presenter:
Kathleen Kane

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

March 25, 2026 **Agenda Item 7b - 26-0245**

MTC Resolution No. 4756. Resolution Authorizing the Use of Teleconference Meetings by the MTC ABAG Community Advisory Council and Making Related Findings

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Subject:

A request for approval of MTC Resolution No. 4756 authorizing the use of teleconference meetings by the MTC ABAG Community Advisory Council (Council) pursuant to Government Code Section 54953.8.6 and making findings that the use of teleconference meetings would benefit the public and the Council.

Background:

The Ralph M. Brown Act (Government Code Section 54950, *et seq*.) is California's open meetings law, generally requiring that all legislative bodies conduct all business in open and public meetings. While the Brown Act originally contemplated primarily in-person meetings, the COVID-19 pandemic has prompted several amendments to the Brown Act to allow more bodies to meet remotely via teleconference to promote flexibility and greater access for body members and the public who are unable to attend in person. The most recent of these amendments went into effect on January 1, 2026.

Under the newly enacted Government Code Section 54953.8.6, "subsidiary bodies" – defined as advisory bodies that do not make final decisions – may be authorized by their creating bodies to meet via teleconference. Government Code Section 54953.8.6 requires the creating body to review the subsidiary body's circumstances and find that authorizing teleconference meetings would benefit the public and the body members. The statute also required the body to still designate at least one location within the jurisdiction of the subsidiary body that serves as the location where body members and members of the public can still attend in person if they choose to do so. Authorizing teleconference meetings under this statute differs from other methods of teleconferencing because it allows all body members to participate remotely from any location for all meetings without requiring special notice or approval.

The Council meets the definition of "subsidiary body," and staff believes that authorizing the Council to participate remotely via teleconference would enhance both public and Council member participation and access by allowing more individuals to access the meeting online. The Council comprises 27 members from all nine Bay Area counties, many of whom have day jobs, family or other responsibilities, and other life circumstances that would make it difficult for all members to participate in person at the Metro Center every meeting. Allowing teleconferencing for all meetings would greatly reduce the burden of the Council to ensure an in-person quorum at one location and allow all members to participate as they are able. Because the statute requires an in-person location to still be available, members of the public would still have the option to attend in person or via teleconference at their discretion.

Staff recommends that the Commission adopt MTC Resolution No. 4756 making the appropriate findings and authorizing the use of teleconference meetings by the Council. The findings and authorization of the resolution can be renewed by the Commission by simple majority vote, and the Commission need not amend or replace the resolution unless specific circumstances have changed.

Next Steps:

Because the Council was created jointly by both the Commission and the Association of Bay Area Governments (ABAG), the ABAG Executive Committee must also adopt a similar resolution. Once both resolutions are adopted, members of the Council would be able to use teleconference meetings pursuant to Government Code Section 54953.8.6. Staff will ensure that an action item will be brought to the Commission to renew the resolution at the required six-month intervals.

Issues:

None identified.

Recommendations:

Staff recommends that the Commission adopt MTC Resolution No. 4756 authorizing the Council to use teleconference meetings and making findings that such authorization benefits the public and the Council.

Attachments:

MTC Resolution No. 4756

Andrew B. Fremier

Date: March 25, 2026
Referred by: Commission

ABSTRACT
Resolution No. 4756

This resolution makes findings regarding the benefits of teleconferencing by the MTC ABAG Community Advisory Council and authorizes the Council to use teleconferencing pursuant to Cal. Government Code Section 54953.8.6.

Further discussion of this action is contained in the Metropolitan Transportation Commission Summary Sheet dated March 25, 2026.

Date: March 25, 2026
Referred by: Commission

RE: Subsidiary Body Teleconferencing Approval for Community Advisory Council

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4756

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Section 66500 *et seq*.; and

WHEREAS, MTC and the Association of Bay Area Governments (ABAG) have jointly created the MTC ABAG Community Advisory Council (Council), a 27-member advisory body that provides input on regional housing and transportation decisions; and

WHEREAS, the Council serves exclusively in an advisory capacity for both MTC and ABAG; and

WHEREAS, Government Code Section 54953.8.6 allows eligible subsidiary bodies – generally defined as advisory bodies – to meet via teleconference upon initial review and approval by their creating bodies and renewal of that review and approval every six months; and

WHEREAS, the Council is not authorized to take final action on legislation, regulations, contracts, licenses, permits, or any other entitlements, grants, or allocation of funds; and

WHEREAS, the Council does not have primary subject matter jurisdiction that focuses on elections, budgets, police oversight, privacy, removing from, or restricting access to, materials available in public libraries, or taxes or related spending proposals; and

WHEREAS, MTC has considered the circumstances of the Council; and

WHEREAS, MTC finds that teleconference meetings of the Council would enhance public access to meetings of the Council, and the public has been made aware of the type of remote participation, including audio-visual or telephonic, that will be made available at a regularly scheduled meeting and has been provided the opportunity to comment at an in-person meeting of the legislative body authorizing the subsidiary body to meet entirely remotely; and

WHEREAS, teleconference meetings of the Council would promote the attraction, retention, and diversity of eligible subsidiary body members; now, therefore, be it

RESOLVED, that the above findings are true and correct; and, be it further

RESOLVED, that the MTC ABAG Community Advisory Council is authorized to meet via teleconference pursuant to Government Code Section 54953.8.6 in compliance with any other state or federal laws relating to access to public meetings; and, be it further

RESOLVED, that the findings and effects of this Resolution may be renewed via majority vote of MTC without the need to amend or alter the Resolution.

METROPOLITAN TRANSPORTATION COMMISSION

_____

Sue Noack, Chair

The above resolution was entered into by
the Metropolitan Transportation Commission
at a regular meeting of the Commission held
in San Francisco, California and at other
remote locations on March 25, 2026.

375 Beale Street, Suite 800
San Francisco, CA 94105

File #: 26-0373, **Version:** 1

Subject:
MTC Resolution No. 4761. Resolution Authorizing the Use of Teleconference Meetings by the Regional Network Management (RNM) Customer Advisory Group and Making Related Findings

Presenter:
Kathleen Kane

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

March 25, 2026 **Agenda Item 7c - 26-0373**

MTC Resolution No. 4761. Resolution Authorizing the Use of Teleconference Meetings by the MTC RNM Customer Advisory Group and Making Related Findings

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Subject:

A request for approval of MTC Resolution No. 4761 authorizing the use of teleconference meetings by the MTC Regional Network Management (RNM) Customer Advisory Group pursuant to Government Code Section 54953.8.6 and making findings that the use of teleconference meetings would benefit the public and the Advisory Group.

Background:

The Ralph M. Brown Act (Government Code Section 54950, *et seq*.) is California's open meetings law, generally requiring that all legislative bodies conduct all business in open and public meetings. While the Brown Act originally contemplated primarily in-person meetings, the COVID-19 pandemic has prompted several amendments to the Brown Act to allow more bodies to meet remotely via teleconference to promote flexibility and greater access for body members and the public who are unable to attend in person. The most recent of these amendments went into effect on January 1, 2026.

Under the newly enacted Government Code Section 54953.8.6, "subsidiary bodies" – defined as advisory bodies that do not make final decisions – may be authorized by their creating bodies to meet via teleconference. Government Code Section 54953.8.6 requires the creating body to review the subsidiary body's circumstances and find that authorizing teleconference meetings would benefit the public and the body members. The statute also required the body to still designate at least one location within the jurisdiction of the subsidiary body that serves as the location where body members and members of the public can still attend in person if they choose to do so. Authorizing teleconference meetings under this statute differs from other methods of teleconferencing because it allows all body members to participate remotely from any location for all meetings without requiring special notice or approval.

The RNM Customer Advisory Group meets the definition of "subsidiary body," and staff believes that authorizing the RNM Customer Advisory Group to participate remotely via

teleconference would enhance both public and RNM Customer Advisory Group member participation and access by allowing more individuals to access the meeting online. The RNM Customer Advisory Group comprises 20 members of the public from all nine Bay Area counties, many of whom have day jobs, family or other responsibilities, and other life circumstances that would make it difficult for all members to participate in person at the Metro Center every meeting. Allowing teleconferencing for all meetings would greatly reduce the burden on the RNM Customer Advisory Group to ensure an in-person quorum at one location and allow all members to participate as they are able. Because the statute requires an in-person location to still be available, members of the public would still have the option to attend in person or via teleconference at their discretion.

Staff recommends that the Commission adopt MTC Resolution No. 4761 making the appropriate findings and authorizing the use of teleconference meetings by the RNM Customer Advisory Group. The findings and authorization of the resolution can be renewed by the Commission by simple majority vote, and the Commission need not amend or replace the resolution unless specific circumstances have changed.

Issues:

None identified.

Recommendations:

Staff recommends that the Commission adopt MTC Resolution No. 4761 authorizing the RNM Customer Advisory Group to use teleconference meetings and making findings that such authorization benefits the public and the RNM Customer Advisory Group.

Attachments:

MTC Resolution No. 4761

Andrew B. Fremier

Date: March 25, 2026
Referred by: Commission

ABSTRACT
Resolution No. 4761

This resolution makes findings regarding the benefits of teleconferencing by the Regional Network Management (RNM) Customer Advisory Group and authorizes the Advisory Group to use teleconferencing pursuant to Cal. Government Code Section 54953.8.6.

Further discussion of this action is contained in the Metropolitan Transportation Commission Summary Sheet dated March 25, 2026.

Date: March 25, 2026
Referred by: Commission

RE: Subsidiary Body Teleconferencing Approval for RNM Customer Advisory Group

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4761

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Section 66500 *et seq*.; and

WHEREAS, MTC has created the MTC RNM Customer Advisory Group (Advisory Group), a 20-member advisory body that provides input on the regional public transit user experience; and

WHEREAS, the Advisory Group serves exclusively in an advisory capacity for MTC; and

WHEREAS, Government Code Section 54953.8.6 allows eligible subsidiary bodies – generally defined as advisory bodies – to meet via teleconference upon initial review and approval by their creating bodies and renewal of that review and approval every six months; and

WHEREAS, the Advisory Group is not authorized to take final action on legislation, regulations, contracts, licenses, permits, or any other entitlements, grants, or allocation of funds; and

WHEREAS, the Advisory Group does not have primary subject matter jurisdiction that focuses on elections, budgets, police oversight, privacy, removing from, or restricting access to, materials available in public libraries, or taxes or related spending proposals; and

WHEREAS, MTC has considered the circumstances of the Advisory Group; and

WHEREAS, MTC finds that teleconference meetings of the Advisory Group would enhance public access to meetings of the Advisory Group, and the public has been made aware of the type of remote participation, including audio-visual or telephonic, that will be made available at a regularly scheduled meeting and has been provided the opportunity to comment at

an in-person meeting of the legislative body authorizing the subsidiary body to meet entirely remotely; and

WHEREAS, teleconference meetings of the Advisory Group would promote the attraction, retention, and diversity of eligible subsidiary body members; now, therefore, be it

RESOLVED, that the above findings are true and correct; and, be it further

RESOLVED, that the MTC RNM Customer Advisory Group is authorized to meet via teleconference pursuant to Government Code Section 54953.8.6 in compliance with any other state or federal laws relating to access to public meetings; and, be it further

RESOLVED, that the findings and effects of this Resolution may be renewed via majority vote of MTC without the need to amend or alter the Resolution.

METROPOLITAN TRANSPORTATION COMMISSION

Sue Noack, Chair

The above resolution was entered into by
the Metropolitan Transportation Commission
at a regular meeting of the Commission held
in San Francisco, California and at other
remote locations on March 25, 2026.

375 Beale Street, Suite 800
San Francisco, CA 94105

File #: 26-0372, **Version:** 1

Subject:
MTC Resolution No. 4760. Resolution Authorizing Submission of SB63 Report on Transit Ridership Forecasts from Plan Bay Area 2050+ to Legislature and Establishing Additional Rules and Procedures Related to the SB63 Financial Efficiency Review Independent Oversight Committee

Presenter:
Kathleen Kane

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

March 25, 2026 **Agenda Item 7d - 26-0372**

MTC Resolution No. 4760. Resolution Authorizing Submission of SB63 Report on Transit Ridership Forecasts from Plan Bay Area 2050+ to Legislature and Establishing Additional Rules and Procedures Related to the SB63 Financial Efficiency Review Independent Oversight Committee

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Subject:

A request for approval of MTC Resolution No. 4760 **authorizing submission of the SB63 report on transit ridership forecasts from Plan Bay Area 2050+ to the Legislature, and** establishing additional rules and procedures related to the SB63 Financial Efficiency Review Independent Oversight Committee.

Background:

The newly chaptered Title 7.85 of the California Government Code, commencing with Government Code Section 67700 (Senate Bill 63/Connect Bay Area Act, Weiner, October 13, 2025) creates the Public Transit Revenue Measure District (PTRMD, or "District") with jurisdiction extending the territorial boundaries of the Counties of Alameda, Contra Costa, San Mateo, and Santa Clara, and the City and County of San Francisco. This new law provides that the District will be governed by the same board that governs the Metropolitan Transportation Commission (MTC, or "Commission").

As provided in Government Code Section 67730 and 67732, the District, or alternatively a qualified voter initiative, may impose a retail transactions and use tax ordinance applicable to the entire district for a duration of 14 years, and in an amount of 0.5% in each of the above-described counties located within the district and 1% in the City and County of San Francisco, subject to voter approval at the November 3, 2026, statewide general election. Pursuant to Section 67700 *et seq.,* the District has many responsibilities should a tax measure be proposed under this title, including administrative responsibilities related to the November 3, 2026 statewide general election, and additional responsibilities if such measure were to be approved by the voters.

In addition to those responsibilities required of the District, the legislature has also placed certain responsibilities directly on the Commission. One of the first responsibilities mandated through the statute was for the Commission to submit a report to the Legislature, containing "its forecast of the impacts to ridership on the Alameda-Contra Costa Transit District, the Peninsula Corridor Joint Powers Board, the San Francisco Bay Area Rapid Transit District, and the San Francisco Municipal Transportation Agency from planned transportation projects and strategies included in its adopted regional transportation plan, with an emphasis on rail connectivity projects that may increase ridership, reduce operating costs, or help with enhanced mobility." California Government Code Section 66513.5(a). This report, due March 31, 2026, has been finalized and is ready for submission at this time.

Additionally, pursuant to Government Code Section 67700 *et seq.*, the Commission must conduct a two-phase financial efficiency review of the statutorily defined subject operators, which are the Alameda-Contra Costa Transit District (AC Transit), the San Francisco Bay Area Rapid Transit District (BART), the Peninsula Corridor Joint Powers Board (Caltrain), and the San Francisco Municipal Transportation Agency (Muni). The law further requires that MTC contract with, and manage, a third-party consultant to conduct phase one of this analysis. In addition to the management of the third-party consultant, Section 67700 *et seq* also requires that the Commission establish a financial efficiency review oversight committee to directly participate in the review process. This committee is tasked with reviewing the phase one analysis, directing the third-party consultant to make any revisions, and ultimately adopting the final phase one analysis.

The Commission established this financial efficiency review oversight committee at their regularly scheduled meeting on January 28, 2026. The first meeting of the Financial Efficiency Review Independent Oversight Committee (Committee) took place on March 6, 2026 at the Bay Area Metro Center, at which time Committee Members learned more about their statutory duties, and were given an overview of the steps necessary to complete the phase one analysis within the statutory deadlines.

Due to the compressed period in which the Committee must perform its statutory duties, the attached Resolution seeks to clarify additional administrative rules and procedures related to the establishment of the Committee to ensure it maintains the ability to perform its statutory duties efficiently and effectively. This includes (but is not limited to) adopting rules and procedures to govern future meetings and setting travel reimbursement guidance. Staff is also requesting that the Commission grant its authority pursuant to Government Code Section 67766 to transmit the final phase one analysis to the statutorily required entities to the Executive Director, MTC. This request is made to ensure the final adopted analysis can be transferred to the subject operators immediately following adoption, and would not require a separate transmittal action by the Commission itself.

Issues:

None identified.

Recommendations:

Staff recommends that the Commission adopt MTC Resolution No. 4760 authorizing submission of the SB63 report on transit ridership forecasts from Plan Bay Area 2050+ to the Legislature and establishing additional rules and procedures related to the SB63 Financial Efficiency Review Independent Oversight Committee

Attachments:

- MTC Resolution No. 4760
- SB63 Report on Transit Ridership Forecasts from Plan Bay Area 2050+

Andrew B. Fremier

Date: March 25, 2026
W.I.: N/A

ABSTRACT

Resolution No. 4760

This resolution **authorizes submission of the SB63 report** on transit ridership forecasts from Plan Bay Area 2050+ **to the Legislature and** establishes additional rules and procedures related to the SB63 Financial Efficiency Review Independent Oversight Committee.

Further discussion of this action is contained in the Commission Summary Sheet dated March 25, 2026.

Date: March 25, 2026
W.I.: N/A

RE: Authorizing Submission of SB63 Report on Transit Ridership Forecasts from Plan Bay Area 2050+ to Legislature and Establishing Additional Rules and Procedures Related to the SB63 Financial Efficiency Review Independent Oversight Committee

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4760

WHEREAS, Title 7.85 of the Government Code, commencing with Government Code Section 67700 (Senate Bill 63/Connect Bay Area Act, Weiner, October 13, 2025) creates the Public Transit Revenue Measure District (PTRMD, or "District") with jurisdiction extending the territorial boundaries of the Counties of Alameda, Contra Costa, San Mateo, and Santa Clara, and the City and County of San Francisco, and provides that the District shall be governed by the same board that governs the Metropolitan Transportation Commission (MTC, or "Commission"); and

WHEREAS, per Government Code Section 67730 and 67732, the District, or alternatively a qualified voter initiative, may impose a retail transactions and use tax ordinance applicable to the entire district for a duration of 14 years, and in an amount of 0.5% in each of the above-described counties located within the district and 1% in the City and County of San Francisco, subject to voter approval at the November 3, 2026, statewide general election; and

WHEREAS, pursuant to Section 67700 *et seq.,* the District has many responsibilities should a tax measure be proposed pursuant to Title 8.75, including administrative responsibilities related to the November 3, 2026 statewide general election, as well as additional responsibilities if such measure were to be approved by the voters; and

WHEREAS, Section 67700 *et seq.* also places certain responsibilities on MTC related to any potential measure, including submission of a report to the Legislature, containing "its forecast of the impacts to ridership on the Alameda-Contra Costa Transit District, the Peninsula Corridor Joint Powers Board, the San Francisco Bay Area Rapid Transit District, and the San Francisco Municipal Transportation Agency from planned transportation projects and strategies included in its adopted regional transportation plan, with an emphasis on rail connectivity projects that may increase ridership, reduce operating costs, or help with enhanced mobility"; and

WHEREAS, this report has been completed and is ready for submission before the statutory deadline of March 31, 2026; and

WHEREAS, Section 67700 *et seq.* also directs MTC to conduct a two-phase financial efficiency review of statutorily defined "subject operators," which requires that MTC contract with, and manage, a third-party consultant to conduct the phase one review; and

WHEREAS, in addition to the management of the third-party consultant, Section 67700 *et seq* also requires that MTC establish a financial efficiency review oversight committee to review the phase one analysis, direct the third-party consultant to make any revisions, and adopt a final phase one analysis; and

WHEREAS, MTC established this financial efficiency review oversight committee and appointed committee members at their regularly scheduled meeting on January 28, 2026, and the first meeting of the Financial Efficiency Review Independent Oversight Committee (Committee) took place on March 6, 2026 at the Bay Area Metro Center; and

WHEREAS, the Commission seeks to clarify additional administrative rules and procedures related to the establishment of the Committee to ensure it maintains the ability to perform its statutory duties efficiently and effectively; and

WHEREAS, due to the accelerated timing of the phase one review and analysis, the Commission further seeks to grant the Executive Director its authority pursuant to Government Code Section 67766 to transmit the final phase one analysis to the statutorily required entities; now, therefore, be it

RESOLVED, that the Commission finds that the foregoing recitals are true and correct; and be it further

RESOLVED, that the Commission authorizes the transfer of the SB63 report on transit ridership forecasts from Plan Bay Area 2050+ to the Legislature, and that the Executive Director, MTC or his designee shall submit the report prior to the March 31, 2026 deadline; and be it further

RESOLVED, that the MTC Commission Procedures Manual shall be the Committee's procedures manual; and be it further

RESOLVED, as noted in the Commission's action on January 28, 2026, travel for any Committee member who lives more than 400 miles from the jurisdiction of the District shall be entitled to reimbursement of necessary travel costs incurred to attend a Committee meeting in-person, but such reimbursement (per meeting) is limited to the cost of an economy class roundtrip airfare on a major carrier, as well as a maximum of two nights lodging and per-diem at GSA rates for San Francisco that are in place at the time of travel; and be it further

RESOLVED, for any Committee Member who lives less than 400 miles from the jurisdiction of the District, ordinary MTC travel reimbursement rules and procedures shall apply; and be it further

RESOLVED, that in addition to travel reimbursement, each Committee Member shall be entitled to receive $50 per meeting attended, up to a maximum of ten meetings per year; and be it further

RESOLVED, that the Executive Director, MTC is granted the Commission's authority pursuant to Government Code Section 67766 to transmit the final phase one analysis to the statutorily required entities.

METROPOLITAN TRANSPORTATION COMMISSION

_____

Sue Noack, Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a duly called and noticed meeting held in San Francisco, California and at other remote locations, on March 25, 2026.

Transit Ridership Forecasts

from Plan Bay Area 2050+

March 2026

Published by Regional Planning and Programs

METROPOLITAN TRANSPORTATION COMMISSION

Metropolitan Transportation Commission

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Transit Ridership Forecasts from Plan Bay Area 2050+

METROPOLITAN TRANSPORTATION COMMISSION

Metropolitan Transportation Commission

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Transit 2050+: A New Vision for the Bay Area's Transit Network

Photo: Joey Kotfica

Executive Summary

This report fulfills the requirements established by Senate Bill 63 (Wiener/Arreguín), which added Government Code Section 66513.5(a) requiring that "the [Metropolitan Transportation Commission] shall submit a report to the Legislature on or before March 31, 2026, on its forecast of the impacts to ridership on the Alameda-Contra Costa Transit District [AC Transit], the Peninsula Corridor Joint Powers Board [Caltrain], the San Francisco Bay Area Rapid Transit District [BART], and the San Francisco Municipal Transportation Agency [SFMTA] from planned transportation projects and strategies included in its adopted regional transportation plan, with an emphasis on rail connectivity projects that may increase ridership, reduce operating costs, or help with enhanced mobility."

Plan Bay Area 2050+ is the 25-year regional plan connecting transportation, housing, the economy and the environment, fulfilling both the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) requirements established under federal and state law. The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG)'s Executive Board adopted Plan Bay Area 2050+ in March 2026. The transit strategies and projects included in the Plan Bay Area 2050+ Transportation Element were developed as part of Transit 2050+, a long-range modal plan for maintaining and improving the Bay Area's transit network. The report detailing the development of Transit 2050+ is included as Appendix A.[1]

With no additional investments in transit service (i.e., maintaining and operating the existing transit network only), Bay Area transit ridership is forecast to double from just over 1 million

[1] Further details and information about Plan Bay Area 2050+ are available at https://planbayarea.org/.

average weekday boardings in 2023 to over 2 million in 2050. Overall, the planned transit strategies and projects included in Plan Bay Area 2050+ are forecast to increase average weekday boardings in the Bay Area by 1.2 million in 2050, for a total of almost 3.3 million. AC Transit, BART, Caltrain, SamTrans, SFMTA and VTA could see some of the largest ridership gains with plan implementation.

Of the forecasted increase of 1.2 million daily boardings, approximately 70,000 average weekday transit boardings throughout the Bay Area can be attributed to implementation of planned "rail connectivity projects," described below. This includes 20,000 boardings on BART; 50,000 boardings on Caltrain; and 10,000 boardings on AC Transit. If only rail connectivity projects are implemented, SamTrans and SFMTA boardings may decline slightly as riders traveling along the San Francisco Peninsula may shift to Caltrain to take advantage of the Caltrain extension to downtown San Francisco.

For this report, "rail connectivity projects" are defined as planned projects that expand rail service to locations throughout the Bay Area. These projects are included in Plan Bay Area 2050+ Strategy T12, "Expand Transit Services Throughout the Region" and are as follows:

- BART to Silicon Valley Phase II, extending service to downtown San José and Santa Clara.
- Caltrain/High-Speed Rail Portal, extending service to Salesforce Transit Center in San Francisco.
- Valley Link rail service from Dublin/Pleasanton BART to San Joaquin County.
- Valley Transportation Authority (VTA) Light Rail extension from Alum Rock to Eastridge in east San José.
- Sonoma-Marin Area Rail Transit (SMART) extensions to Healdsburg and Cloverdale in northern Sonoma County.

Introduction

This report fulfills the requirements established by California Senate Bill 63 (Wiener/Arreguín, 2025), which added Government Code Section 66513.5. (a) requiring that "The [Metropolitan Transportation Commission] commission shall submit a report to the Legislature on or before March 31, 2026, on its forecast of the impacts to ridership on the Alameda-Contra Costa Transit District [AC Transit], the Peninsula Corridor Joint Powers Board [Caltrain], the San Francisco Bay Area Rapid Transit District [BART], and the San Francisco Municipal Transportation Agency [SFMTA] from planned transportation projects and strategies included in its adopted regional transportation plan, with an emphasis on rail connectivity projects that may increase ridership, reduce operating costs, or help with enhanced mobility."

This report includes:

- A summary of the transit strategies included in Plan Bay Area 2050+, which fulfills federal and state requirements and serves as the Bay Area's Regional Transportation Plan and Sustainable Communities Strategy.
- A description of the rail connectivity projects included in Plan Bay Area 2050+ Strategy T12, "Expand Transit Services Throughout the Region".
- Forecasts of future transit ridership for the Bay Area's large transit agencies, including AC Transit, BART, Caltrain, SFMTA and VTA, as well as the entire Bay Area with and without implementation of Strategy T12 and other Plan Bay Area 2050+ strategies.
- A summary of key findings regarding how implementation of planned transit strategies, including rail connectivity projects included in Strategy T12, may impact future transit ridership in the Bay Area.

Background and Context

Senate Bill 63

Senate Bill 63 (Wiener/Arreguín), signed into law by Governor Gavin Newsom in October 2025, authorizes a November 2026 ballot measure to prevent major service cuts at BART and other Bay Area transit systems and to make improvements to transit affordability, accessibility and reliability in the San Francisco Bay Area. The law allows the measure to be placed on the ballot either through action by a newly formed Public Transit Revenue Measure District governed by the same board as the MTC or via a citizen's initiative.

The bill's enactment clears the way for voters in Alameda, Contra Costa, San Francisco, San Mateo and Santa Clara counties to consider a 14-year regional transportation sales tax that would generate approximately $980 million annually across the five counties. The bill authorizes voter consideration of a half-cent sales tax in Alameda, Contra Costa, San Mateo and Santa Clara counties and a one-cent sales tax in San Francisco.

Approximately 60% of the revenue that would be raised if voters approve the measure will be dedicated to preserving service on BART, Muni, Caltrain and AC Transit, as well as San Francisco Bay Ferry and smaller transit agencies providing service in the five counties, to keep buses, trains and ferries moving. About one-third of the revenue would go to the Santa Clara Valley Transportation Authority (VTA), SamTrans, the Alameda County Transportation Commission and the Contra Costa Transportation Authority, with flexibility to use funds for

transit capital, operations, or road paving projects on roads with regular bus service. About 4.5%, equivalent to $43 million in fiscal year 2027-28, will go toward improving the rider experience, funding priorities identified in the 2021 Bay Area Transit Transformation Action Plan and Plan Bay Area 2050+.

The law also includes accountability and oversight provisions to ensure that tax dollars will be used responsibly. These include establishing an independent oversight committee; a financial efficiency review for BART, SFMTA, Caltrain and AC Transit; a requirement to maintain existing levels of funding for transit operations; and additional county-level oversight of transit service quality.

Plan Bay Area 2050+

Plan Bay Area 2050+ is the San Francisco Bay Area's long-range regional plan and fulfills both the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS) requirements established under federal and state law. It aims to improve transportation, housing, the economy and the environment across the region by 2050 and includes 35 strategies[2] organized into 11 themes, under four elements: transportation, housing, economy and environment. The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG)'s Executive Board are anticipated to adopt Plan Bay Area 2050+, the 25-year regional plan, in March 2026.

Transit 2050+: A New Vision for the Bay Area's Transit Network

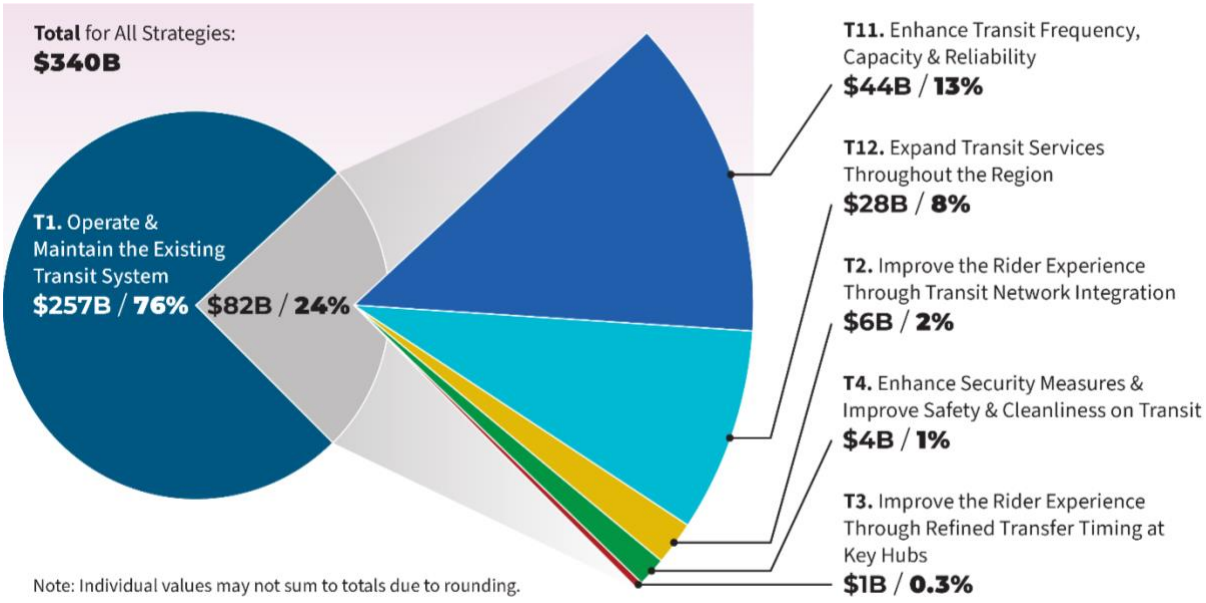
The transit strategies and projects included in the Plan Bay Area 2050+ Transportation Element were developed as part of Transit 2050+, a long-range modal plan for maintaining and improving the Bay Area's transit network. The report detailing the development of Transit 2050+ is included as **Appendix A**. (Further details and information about Plan Bay Area 2050+ are available at https://planbayarea.org/.)

The project and programmatic investments that make up the Transit 2050+ Network are organized into six thematic strategies.[3] In total, Transit 2050+ envisions a nearly $340 billion investment in the Bay Area's transit network over the next 25 years. **Figure 1** shows the strategies that comprise the Transit 2050+ Network and their funding amounts. Most of this investment, approximately $257 billion, would be used to maintain existing transit service and assets. This reflects the fact that the Bay Area's transit network is expansive and relatively mature today. The remaining roughly $82 billion would support improvements in and expansion of transit service throughout the Bay Area as well as programs to enhance the transit customer experience. Rail connectivity projects are included in Strategy T12, which is further described in the following section.

[2] A strategy is a public policy or set of investments that can be implemented in the Bay Area at the city, county, regional or state level over the 25-year plan horizon.

[3] The Transit 2050+ strategy numbers are not consecutive since they are part of the Plan Bay Area 2050+ Transportation Element strategies, which also include non-transit strategies.

Figure 1. Transit 2050+ Network strategies and funding amounts (Year of Expenditure, $billions).



Strategy T1. Operate and Maintain the Existing System | $257 Billion
Commit to operate and maintain the Bay Area's existing transit infrastructure and service levels (as of fall 2023) while transitioning to zero-emission transit vehicles.[4]

Strategy T2. Improve the Rider Experience Through Transit Network Integration | $6 Billion
Deliver regionwide efforts to improve the rider experience, including an integrated fare structure, unified mapping and wayfinding, and improved paratransit services.

Strategy T3. Improve the Rider Experience Through Refined Transfer Timing at Key Regional Hubs | $1 Billion
Deliver regionwide projects to improve the coordination of inter-agency schedules, refine transfer timing at key regional hubs, and upgrade facilities to encourage easier transfers.

Strategy T4. Enhance Security Measures and Improve Safety and Cleanliness on Transit | $4 Billion
Improve infrastructure and operations around safety, personal security and cleanliness in the transit environment.

Strategy T11. Enhance Transit Frequency, Capacity and Reliability | $44 Billion
Improve the vitality and viability of existing transit services throughout the Bay Area by providing increased frequency, improved reliability and greater capacity to reduce wait times, decrease travel time and encourage ridership growth.

Strategy T12. Expand Transit Services Throughout the Region | $28 Billion
Better connect communities by strategically expanding transit services to new markets and previously unserved or underserved areas, including the addition of new infrastructure.

[4] Only the transit portion of Strategy T1 is represented here. The full cost of operating and maintaining the Bay Area's existing transportation system is $380 billion.

Rail Connectivity Projects in Transit 2050+ and Plan Bay Area 2050+

For this report, rail connectivity projects are defined as planned projects that expand rail service to locations throughout the Bay Area. Plan Bay Area 2050+ includes five such projects that account for $26.9 billion of the $28 billion for Strategy T12, “Expand Transit Services Throughout the Region”. In addition to these planned rail connectivity projects, Strategy T12 also includes funding for ongoing transit project development and transit studies.

Project sponsors provided scopes and budgets for the five rail connectivity projects listed below, and budgets and scopes were finalized for inclusion in Draft Plan Bay Area 2050+ in fall 2024. Project scopes and budgets may continue to evolve; these either will be included in subsequent amendments to Plan Bay Area 2050+ or will be included in the next regional plan update, Plan Bay Area 2060.

- **BART to Silicon Valley Phase II to downtown San José and Santa Clara ($13.5 billion[5])** – This project will extend BART's Green Line and Orange Line rail services between San José (Berryessa) and Santa Clara. Improvements include four new stations and park-and-ride facilities. This project is expected to become operational between 2036 and 2050.
- **Caltrain/High-Speed Rail Portal to Salesforce Transit Center in San Francisco ($8.9 billion)** – This project will extend Caltrain rail service in San Francisco between 4th and Townsend Streets and the Salesforce Transit Center. Improvements include two new stations. This project is expected to become operational between 2036 and 2050.
- **Valley Link rail service from Dublin/Pleasanton BART to San Joaquin County ($3.1 billion)** – The initial scope for this project would implement new rail service between San Joaquin County (Mountain House) and the existing Dublin/Pleasanton BART station, including three new stations in Alameda County and four-car trains. The Tri-Valley/San Joaquin Valley Regional Rail Authority, which oversees the Valley Link project, is considering different phasing options that may enable portions of the project to advance sooner. Any changes to the scope, cost, schedule and phasing of the Valley Link project from what is included in Plan Bay Area 2050+ would be addressed through an amendment to the plan.
- **Valley Transportation Authority (VTA) Light Rail extension from Alum Rock to Eastridge in east San José ($0.7 billion)** – This project will extend VTA's existing Orange Line service from Alum Rock Station to the Eastridge Transit Center. Improvements include two new stations and elevated structures. This project is under construction and is expected to become operational before 2035.
- **Sonoma Marin Area Rail Transit (SMART) extensions to Healdsburg ($0.3 billion) and Cloverdale ($0.4 billion) in northern Sonoma County** – These projects will extend SMART rail service between Windsor and Cloverdale, including two new stations in Healdsburg and Cloverdale. Both projects are expected to become operational by 2035.

[5] All dollar values are for the anticipated year of expenditure, including both capital and operating & maintenance costs.

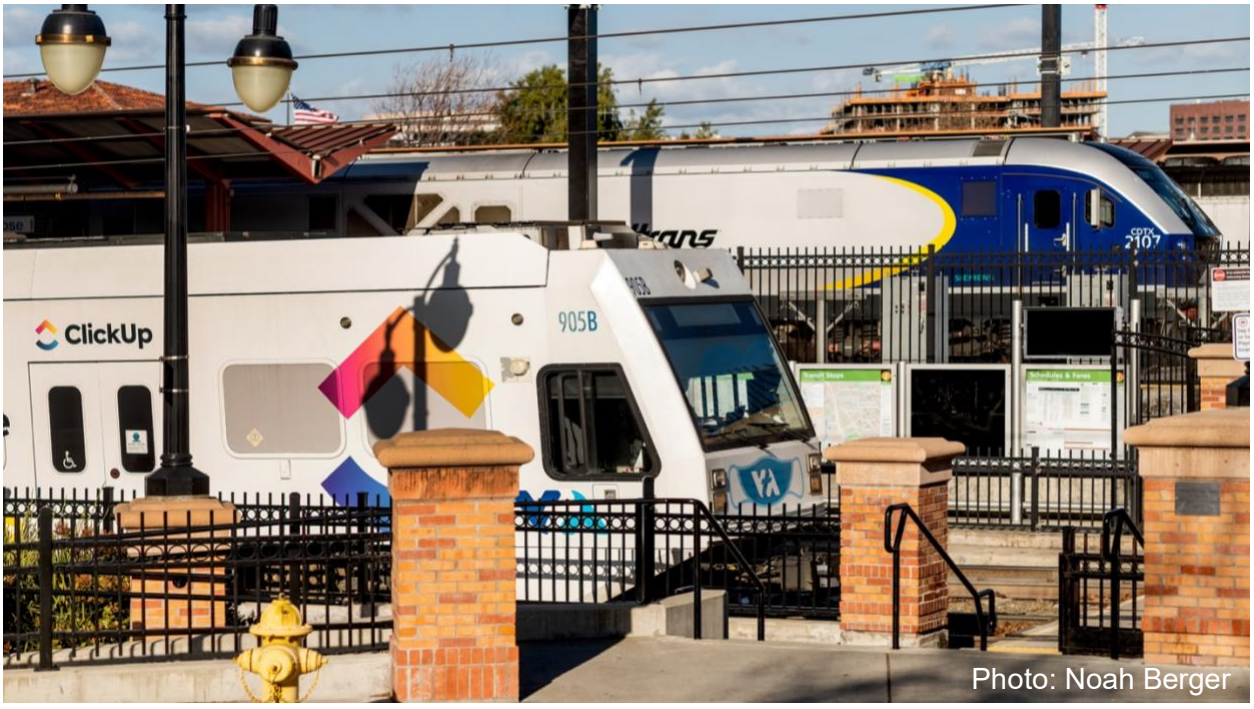


Photo: Noah Berger

Together, these projects would expand the existing transit network to better connect communities throughout the Bay Area by serving new markets or existing markets that currently are underserved. These projects also would provide fast, frequent and reliable transit options along some of the Bay Area's most congested highway corridors, including U.S. Route 101 and Interstates 580 and 880, providing improved access to job centers and downtowns while reducing vehicle miles traveled and greenhouse gas emissions.

The following section details the forecasted transit ridership impacts resulting from implementation of the rail connectivity projects included in Strategy T12. It also includes forecasted transit ridership resulting from implementation of all Transit 2050+ Network strategies and other Plan Bay Area 2050+ strategies, including those that prioritize locating future homes and jobs near transit stops and stations.

Photo: Noah Berger

Transit Ridership Forecast

MTC uses its regional travel model to understand how implementation of Plan Bay Area 2050+ strategies will affect key outcomes, including future transit ridership. For this report, the transit ridership impacts of planned rail connectivity projects are forecast by isolating the impacts of Strategy T12, "Expand Transit Services Throughout the Region" from the 34 other Plan Bay Area 2050+ strategies.

Technical Approach Used for the Ridership Forecast

To forecast future transit ridership, staff used MTC's Travel Model 1.6, an activity-based regional travel model that simulates the activities of all Bay Area residents on a typical weekday and predicts outcomes for the entire Bay Area transportation network[6] for all modes of transportation. Forecasting relies on key inputs and assumptions consistent with Plan Bay Area 2050+, including the 2050 regional growth forecast (i.e., population and job forecasts), the distribution of growth across the nine-county region, and assumptions about the external forces that will affect future population and jobs growth and other conditions.[7]

For this report, transit ridership is defined as the number of boardings within the nine-county Bay Area on a typical weekday; forecasted transit passengers traveling to or from the Bay Area from other regions are not included. It is important to note that ridership forecasts completed for individual projects may differ from the forecasts included in this report because they use different modeling methodologies, different "horizon" years (i.e., 2040 v. 2050), different assumptions about baseline conditions, and different geographies.

[6] MTC Travel Model 1.6 only forecasts transit ridership for trips with origins and destinations within the nine-county San Francisco Bay Area region. Consequently, trips made between adjacent regions and the Bay Area are not captured in ridership forecasts produced by the travel model, although these account for a relatively small percentage of overall transit trips in the Bay Area.

[7] Detailed information about the forecasting and modeling process used in Plan Bay Area 2050+ is provided in the Forecasting and Modeling Report available at https://planbayarea.org/.

Photo: courtesy of VTA

Forecasted Impacts of Planned Projects and Strategies

Forecasted average weekday transit boardings in 2050 are shown in **Table 1**. The 2023 baseline average weekday transit boardings are also included as a point of reference. The table shows forecasted transit ridership in 2050 for the "no plan" scenario, which represents future conditions *without* implementation of Plan Bay Area 2050+ projects and strategies[8], as well as total forecasted transit ridership in 2050 with full implementation of Plan Bay Area 2050+.

Table 1 also shows the forecasted incremental transit ridership gains from different Plan Bay Area 2050+ strategies, including the rail connectivity projects in Strategy T12 discussed in the prior section of this report.[9] These forecasted ridership gains represent the *additional* average daily transit boardings that would result from implementation of Plan Bay Area 2050+ strategies over and above the forecasted transit ridership for the "no plan" scenario. This includes:

- All non-transit strategies (i.e., strategies within the Housing, Economy and Environment elements of the plan as well as other non-transit strategies within the Transportation element).
- Other transit strategies *except* for Strategy T12. Expand Transit Services throughout the Region.
- Rail connectivity projects in Strategy T12.

The total 2050 forecasted average weekday transit boardings for the "no plan" scenario is approximately 2 million, representing a 96% increase over the 2023 baseline. With implementation of *all* Plan Bay Area 2050+ projects and strategies, forecasted average weekday transit boardings would increase by an additional 61% to nearly 3.3 million. This represents a 215% increase over the 2023 baseline. Approximately 70,000 average weekday transit boardings of this total increase can be attributed to implementation of the rail connectivity projects included in Strategy T12.

[8] The "no project" scenario assumes that the existing (2023) transit network plus any committed or fully funded planned transportation projects that will become operational by 2050 are in place. It includes the same assumptions about future population and employment growth as the other scenarios (i.e., the regional growth forecast used for Plan Bay Area 2050+).

[9] The VTA light rail extension from Alum Rock to Eastridge is included in the 2050 "No Plan" scenario as part of baseline 2050 transit ridership since the project is already under construction and is expected to begin operations in 2028.

Photo: Joey Kotfica

Table 1. 2050 Average Weekday Transit Boardings Forecast

Transit Agency	2023 Baseline[10]	2050 "No Plan" Scenario	Incremental Transit Ridership Gain from Plan Bay Area 2050+ Strategies Over "No Plan"				2050 with Plan Bay Area 2050+ Scenario
			All Non-Transit Strategies	Other Transit Strategies	Strategy T12: Rail Connectivity	Total Gain	
AC Transit	123,000	220,000	+20,000	+190,000	+10,000	+210,000	430,000
BART	177,000	330,000	+30,000	+30,000	+20,000	+90,000	420,000
Caltrain	33,000	100,000	+10,000	+110,000	+50,000	+160,000	270,000
SamTrans	39,000	70,000	+10,000	+80,000	(-5,000)	+90,000	160,000
SFMTA	473,000	830,000	+100,000	+300,000	(-6,000)	+390,000	1,220,000
VTA	106,000	350,000	(-50,000)	+180,000	+ < 5,000	+140,000	490,000
All Other Transit Agencies	91,000	150,000	+20,000	+130,000	+ < 5,000	+150,000	300,000
Total for All Agencies	**1,042,000**	**2,040,000**	**+150,000**	**+1,020,000**	**+70,000**	**+1,240,000**	**3,280,000**
Percent Increase Over 2050 "No Plan" Ridership	N/A	N/A	+7%	+50%	+3%	+61%	61%

Note: Individual values may not sum to totals due to rounding. The VTA light rail extension from Alum Rock to Eastridge is included in the 2050 "No Plan" scenario as part of baseline 2050 transit ridership because the project is already under construction and is expected to begin operations in 2028.

[10] The 2023 baseline for average daily transit boardings is a travel model output. The travel model is calibrated to observed data, including transit boarding data reported by transit agencies. Using the 2023 travel model baseline (rather than actual 2023 ridership data) provides a more accurate comparison with future year model forecasts, since both are model outputs.

Photo: Karl Nielsen

Key Findings

Job and population growth is forecast to increase Bay Area transit ridership by 2050. Even in the absence of any improvement to or expansion of the existing transit network, average weekday transit boardings are forecast to roughly double from the 2023 baseline of about 1 million boardings to just over 2 million average weekday boardings in 2050 (as shown in the third column of Table 1). This is due largely to job and population growth projected to occur within the region over the next 25 years. SFMTA, VTA and BART are forecast to experience the largest ridership gains from projected population and job growth over the next 25 years, as this growth is expected to be proportionally highest in Santa Clara, San Francisco and Alameda counties.

Even if no transit improvements are made over the next 25 years, implementation of Plan Bay Area 2050+ land use and pricing strategies would further increase forecasted 2050 transit ridership by approximately 150,000 average weekday boardings (as shown in the fourth column of Table 1). This includes strategies that focus future jobs and housing growth near transit stations and stops as well as strategies that seek to better manage traffic congestion and parking demand through pricing. This forecasted increase in transit ridership is not evenly distributed among transit agencies, however. Transit boardings in San Francisco are forecast to increase the most (by approximately 100,000) as the result of changing land use patterns and pricing policies, while transit boardings on VTA may decrease.

Implementation of planned transit strategies and projects that improve the frequency, speed and reliability of service and make it easier, safer and more comfortable for people to use transit are forecast to deliver the greatest ridership increases. Approximately 1 million additional average weekday transit boardings are forecast to occur in the Bay Area with implementation of planned transit strategies and projects that increase the frequency of buses and trains throughout the Bay Area, including lines on AC Transit, BART, Caltrain, SamTrans, SFMTA and VTA (as shown in the fifth column of Table 1). Transit 2050+ would increase the number of transit vehicle revenue hours during the weekday AM peak, midday, and PM peak periods by approximately 60% between 2023 and 2050. These frequency improvements are further supported by planned transit priority projects that improve transit speed and reliability as well as the implementation of initiatives to reduce transfer times at key transit hubs, coordinate

fares, standardize and enhance mapping and wayfinding, and improve safety and cleanliness. These improvements (included in Strategies T2, T3, T4 and T11, as described previously in this report) comprise the greatest dollar share of planned transit investments (after operating and maintaining the existing transit network which is included in Strategy T1), with an estimated cost of some $55 billion.

Construction of planned rail connectivity projects is forecast to increase transit ridership by about 70,000 additional weekday boardings in 2050 (as shown in the sixth column of Table 1). The five planned rail connectivity projects described previously in this report are forecast to have the greatest impact on BART and Caltrain ridership, adding approximately 20,000 and 50,000 additional boardings to those systems respectively on an average weekday. AC Transit boardings could increase by approximately 10,000. SamTrans and SFMTA boardings may decline slightly as riders take advantage of new rail service options that may better meet their needs. This shift in ridership is likely due to the extension of Caltrain to the Salesforce Transit Center in downtown San Francisco.

Altogether, implementation of Plan Bay Area 2050+ strategies, including projects nested within these strategies, is forecast to increase 2050 transit ridership by 61% compared to a scenario without implementation of the improvements in the plan (as shown in the last column of Table 1). Specifically, implementation of Plan Bay Area 2050+ strategies is forecast to increase 2050 transit ridership by an additional 1.2 million average weekday boardings to a total of almost 3.3 million boardings in 2050. This represents a 215% increase over 2023 baseline transit ridership and a 61% increase in forecasted 2050 transit ridership resulting only from projected job and population growth.

Photo: Karl Nielsen

METROPOLITAN TRANSPORTATION COMMISSION

Bay Area Metro Center

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Appendix A

Transit 2050+: A New Vision for the Bay Area's Transit Network

TRANSIT 2050+

A **New Vision** for the **Bay Area's Transit Network**

Metropolitan Transportation Commission

Sue Noack, Chair
Cities of Contra Costa County

Stephanie Moulton-Peters, Vice Chair
Marin County and Cities

Margaret Abe-Koga
Santa Clara County

Eddie H. Ahn
San Francisco Bay Conservation and Development Commission

David Ambuehl
California State Transportation Agency

Candace Andersen
Contra Costa County

Pat Burt
Cities of Santa Clara County

Noelia Corzo
San Mateo County

Marilyn Ezzy Ashcraft
Cities of Alameda County

Victoria Fleming
Sonoma County and Cities

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The report appendices are available at https://planbayarea.org/finalplan.

REGIONAL MAPPING AND WAYFINDING PROJECT
EXISTING TRANSIT NETWORK MAP

Executive Summary

PHOTO: NOAH BERGER

The Bay Area's public transit network relies on buses, trains, streetcars and ferries to serve nearly eight million residents across the region's nine geographically and demographically diverse counties. Transit enables people of all ages and abilities to access jobs, schools and medical care; visit friends and family members; and enjoy the Bay Area's many recreational spaces and events without depending on a car to get there. Transit also plays a key role in making the Bay Area a healthy place to live and work by providing an environmentally sustainable way to travel.

Transit 2050+ envisions a future where Bay Area transit is faster, more frequent, more reliable, safer and better connected. Transit 2050+ also includes continued investment in regional initiatives that make transit more affordable and easier to use and navigate. Once realized, this vision for Bay Area transit could result in 750,000 more transit trips and 660,000 fewer automobile trips each weekday; improve residents' access to jobs and other destinations; and contribute to creating a Bay Area that is affordable, connected, diverse, healthy and vibrant for all.

PHOTO: KARL NIELSEN

Why Was Transit 2050+ Developed?

The COVID-19 pandemic caused a drastic and relatively sudden change in how people worked in 2020, and its effects continue today with more people working remotely or only traveling to job sites a few days per week. More than six years after the start of the pandemic, people are riding transit to workplaces much less often or not at all. This change has had a major impact on transit ridership and fare revenue, and the Bay Area is still adjusting to a "new normal" where many residents' travel patterns and behaviors fundamentally have changed.

To ensure that the transit network could continue to support the Bay Area's economy, health and communities in the aftermath of the pandemic, the Metropolitan Transportation Commission (MTC) convened the Blue Ribbon Transit Recovery Task Force in May 2020, which finalized the Bay Area Transit Transformation Action Plan in July 2021.[1] This action plan recommended the development of a plan to improve transit network connectivity throughout the Bay Area. Consequently, in early 2023 MTC launched the Transit 2050+ initiative in partnership with the Bay Area's transit agencies to undertake a comprehensive update of the transit-related strategies that would be included in Plan Bay Area 2050+, the Bay Area's long-range regional plan for transportation, housing, the economy and the environment.

1 More information about the Blue Ribbon Transit Recovery Task Force and the Bay Area Transit Transformation Action Plan is available at https://mtc.ca.gov/about-mtc/committees/interagency-committees/blue-ribbon-transit-recovery-task-force.

How Will Transit 2050+ Benefit the Bay Area?

If implemented, the Transit 2050+ Network would provide major improvements in transit service frequency, speed, reliability and connectivity2 for the Bay Area. By 2050, these investments would increase regionwide transit service levels by approximately 60%.3

Collectively, these improvements have the potential to increase transit ridership in the Bay Area by 39% in 2035 and 41% in 2050, to a total of 2.6 million daily riders in 2050.4 Implementing the Transit 2050+ Network also will help ensure that the Bay Area can meet its state-mandated climate goals, and improve access to jobs and other destinations throughout the Bay Area, especially for those living in Equity Priority Communities5. According to a performance assessment of how implementation of the Transit 2050+ Network could advance its goals and benefit the Bay Area in the future, the Transit 2050+ Network could provide the following benefits by 2050:

- **Increase access to jobs.** The average household could access 31% more jobs via a 45-minute transit trip.
- **Improve people's ability to access destinations throughout the Bay Area via transit, particularly for residents of Equity Priority Communities.** Access improvements for residents of Equity Priority Communities are up to 61% greater than that of the general population.
- **Increase transit ridership and the share of people using transit versus other modes of transportation.** Transit ridership could increase by 41%, and the share of people regionwide using transit for commute trips could increase to 20%. With improved transit options, Bay Area residents are projected to take nearly 750,000 more transit trips while taking 660,000 fewer automobile trips each weekday.
- **Reduce vehicle miles traveled and greenhouse gas emissions.** Per-capita greenhouse gas (GHG) emissions could decrease 3% by 2035 and 4% by 2050, supporting the Bay Area's achievement of its statutorily required GHG emissions reduction goal.
- **Improve transit speed and reliability.** The share of street-running transit service miles with transit priority treatments could increase from 9% in 2023 to 40% by 2050.

If Transit 2050+ is implemented:

31% increase in access to jobs via 45-minute transit trip

41% increase in transit ridership

20% of work trips made via transit

4% decrease in per-capita greenhouse gas emissions

2 Frequency refers to how often the transit vehicle arrives or the time between trips on a given route. Speed refers to the time required for a transit vehicle to travel a given route. Reliability refers to how often the transit vehicle is on-time and arrives or departs when expected. Connectivity refers to how well different transit routes and systems connect with one another and enable passengers to travel throughout the Bay Area.

3 Implementation of Transit 2050+ would result in an approximate 60% increase in the number of transit vehicle revenue hours during the weekday AM peak, midday, and PM peak periods between 2023 and 2050.

4 The approximate 40% increase in regionwide transit ridership compares forecasted transit ridership and baseline transit ridership in 2050 (i.e., ridership if the Network is not implemented and only current transit service levels are preserved).

5 Equity Priority Communities are census tracts that have a significant concentration of underserved populations, such as households with low incomes and people of color. A combination of additional factors helps define these areas. More information is available at: https://mtc.ca.gov/planning/transportation/access-equity-mobility/equity-priority-communities.

What Is Transit 2050+?

Transit 2050+ consists of a set of strategies, collectively referred to as the Transit 2050+ Network, to be implemented over the next 25 years. Developed in close coordination with Bay Area transit agencies, with input from policymakers, the public and other stakeholders, the Transit 2050+ Network's implementation can deliver a transit network that provides frequent, fast, reliable and connected service across the Bay Area. The Transit 2050+ Network is designed to:

- Develop an integrated, well-connected transit network.
- Recover and grow transit ridership and increase the share of people using transit for their trips.
- Improve the reliability and average travel speed of transit service.
- Reduce barriers to using transit.

Two analyses informed the high-impact transit strategies and investments included in the Transit 2050+ Network. First, an analysis of existing transit service needs was used to identify service and capital projects that should be prioritized for inclusion in the Transit 2050+ Network. Next, an assessment of how potential transit investments could provide benefits under different future conditions was used to identify transit projects with long-term benefits.

Transit 2050+ is intended to be actionable and is based on a realistic forecast of the funding available for transit over the next 25 years. It includes a set of transit strategies determined to be most effective in the near and long term given a limited amount of future funding.

PHOTO: JOEY KOTFICA

Key Elements of the Transit 2050+ Network

In the first decade (through 2035), when future transit funding may be more limited, the Transit 2050+ Network prioritizes lower-cost investments that can deliver significant benefits to transit riders. These priorities include quick-build, lower-cost, high-impact improvements to transit frequency, speed and reliability, as well as improvements to transit safety and convenience. More costly, large-scale capital investments that expand transit service to new locations are prioritized for the longer term (between 2035 and 2050), when additional funding is expected to become available.

More Frequent Transit Service

Frequencies of 5 to 10 minutes or better in urban centers like San Francisco, Oakland and San Jose could enable riders in the most populated parts of the Bay Area to travel without needing to consult a schedule and could reduce transfer and wait times.

More frequent midday service could allow more people to use transit for trips made outside of typical commuting hours.

Frequencies of 15 minutes or better for routes between urban centers could make transit an attractive option for longer trips that are often made in single-occupancy vehicles.

More frequent local service in suburban centers could enable more people to use transit for shorter, neighborhood trips and provide first-mile and last-mile connections to regional transit.

Faster and More Reliable Transit Service

A focus on transit priority throughout the Bay Area could make transit trip times faster and more reliable with both corridor-level improvements and spot treatments in high-delay areas.

Investments in system-level modernization and capacity improvements, including rail grade separations, could significantly improve systemwide reliability and capacity for the Bay Area's highest ridership transit lines.

More Connected Transit Service

Coordination of service and improved infrastructure at major transit hubs could make it much easier and faster to use transit to travel throughout the Bay Area.

Strategic service expansions could address gaps in the existing transit network and improve overall network connectivity, providing new travel options for communities across the Bay Area.

New interregional transit connections between the Bay Area and locations in California's Central Valley provide new statewide connections in the long term.

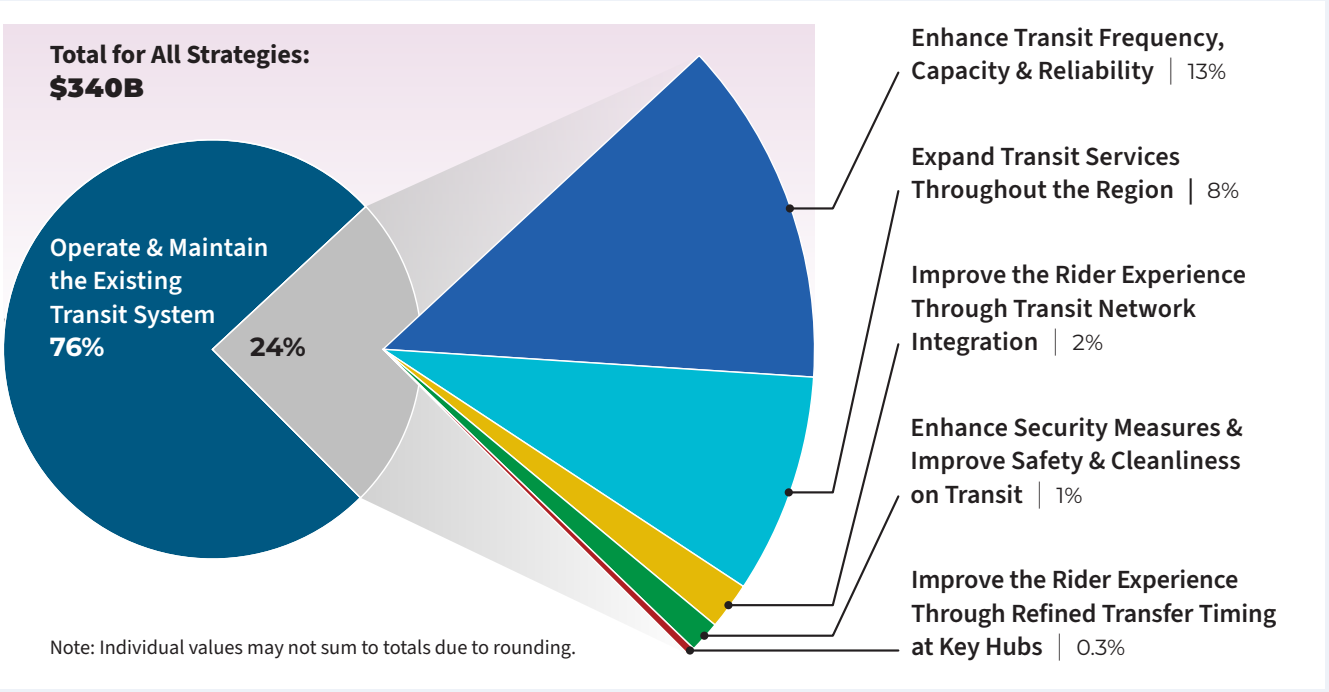
Improved Experience for Transit Riders

Regional programs that make it easier to navigate and use transit services across the Bay Area and that improve system accessibility could remove existing barriers to taking transit. These investments include regional fare coordination and improvements in mapping and wayfinding, safety and security, and paratransit and accessible transportation services for people with disabilities and older adults.

Transit 2050+ Network Strategies

In total, Transit 2050+ envisions a nearly $340 billion investment in the Bay Area's transit network over the next 25 years (**Figure 1**). Most of this investment, approximately $257 billion, would be used to maintain existing transit service and assets. This large investment reflects the fact that the Bay Area's transit network is expansive and relatively mature today. The remaining roughly $82 billion would support improvements in and expansion of transit service throughout the Bay Area and programs to enhance the transit customer experience.

Figure 1. $340 billion total in funds will be distributed between six Transit 2050+ Network Strategies.[6]



Note: Individual values may not sum to totals due to rounding.

Strategy T1. Operate and Maintain the Existing System | $257B
Commit to operate and maintain the Bay Area's existing transit infrastructure and service levels (as of fall 2023) while transitioning to zero-emission transit vehicles.[7]

Strategy T2. Improve the Rider Experience Through Transit Network Integration | $6B
Deliver regionwide efforts to improve the rider experience, including an integrated fare structure, unified mapping and wayfinding, and improved paratransit services.

Strategy T3. Improve the Rider Experience Through Refined Transfer Timing at Key Regional Hubs | $1B
Deliver regionwide projects to improve the coordination of interagency schedules, refine transfer timing at key regional hubs and upgrade facilities to encourage easier transfers.

Strategy T4. Enhance Security Measures and Improve Safety and Cleanliness on Transit | $4B
Improve infrastructure and operations around safety, personal security and cleanliness in the transit environment.

Strategy T11. Enhance Transit Frequency, Capacity and Reliability | $44B
Improve the vitality and viability of existing transit services throughout the Bay Area by providing increased frequency, improved reliability and greater capacity to reduce wait time, decrease travel time and encourage ridership growth.

Strategy T12. Expand Transit Services Throughout the Region | $28B
Better connect communities by strategically expanding transit services to new markets and previously unserved or underserved areas, including the addition of new infrastructure.

6 Strategy numbers are non-consecutive since they are part of the Plan Bay Area 2050+ Transportation Element strategies.

7 Note that only the transit portion of Strategy T1 is represented here. The full cost of operating and maintaining the Bay Area's existing transportation system is $380 billion.

How Will Transit 2050+ Be Implemented?

Delivering the Transit 2050+ Network will require significant investment over the next 25 years to both operate and maintain the Bay Area's existing transit network and to enhance and expand it. Current local, regional, state and federal transit revenues are insufficient, and new revenues are needed to deliver the potential benefits of the Transit 2050+ Network. Plan Bay Area 2050+ anticipates additional new revenues from sources such as the implementation of parking and roadway pricing to become available after 2035, a portion of which will fund transit improvements during that timeframe.

To ensure the successful operation and improvement of the Bay Area's transit network now and into the future, MTC and its partners are working to identify and secure funding for transit service and rider improvements. MTC and its partners advocated and secured enabling legislation (Senate Bill 63 (Wiener/Arreguín)) for a regional transit funding measure on the November 2026 ballot that would provide some of the resources necessary to sustain transit service and make progress on key rider-focused improvements outlined in the Transit 2050+ Network.

In addition to funding, delivering the Transit 2050+ Network will require continued partnership between MTC, transit agencies, all levels of government, other non-governmental stakeholders like advocacy organizations and labor groups, and the public. Near-term actions to advance implementation of the Transit 2050+ Network include:

- Advancing fare integration, regional mapping and wayfinding, paratransit improvements and identification and implementation of transit priority improvements (near-term priorities identified in the Bay Area Transit Transformation Action Plan).
- Implementing improvements to safety, security and cleanliness on transit vehicles and at transit facilities.
- Improving prioritization and delivery of major transit projects, including updating MTC's Major Project Advancement Policy and exploring approaches to improve the efficiency and cost-effectiveness of transit project delivery.

The Transit 2050+ Network provides an attainable vision for the Bay Area's transit network over the next 25 years, but it will require MTC, transit agencies, all levels of government, partner organizations and the public to prioritize resources and make the changes necessary to advance its implementation. Investing in making the Transit 2050+ Network a reality has the potential to transform the way residents and visitors travel around the Bay Area. Its implementation would advance the Plan Bay Area 2050+ vision of creating a more affordable, connected, diverse, healthy and vibrant Bay Area for everyone by significantly reducing the need to rely on private automobiles for transportation.

PHOTO: NOAH BERGER

PHOTO: NOAH BERGER

1. Introduction

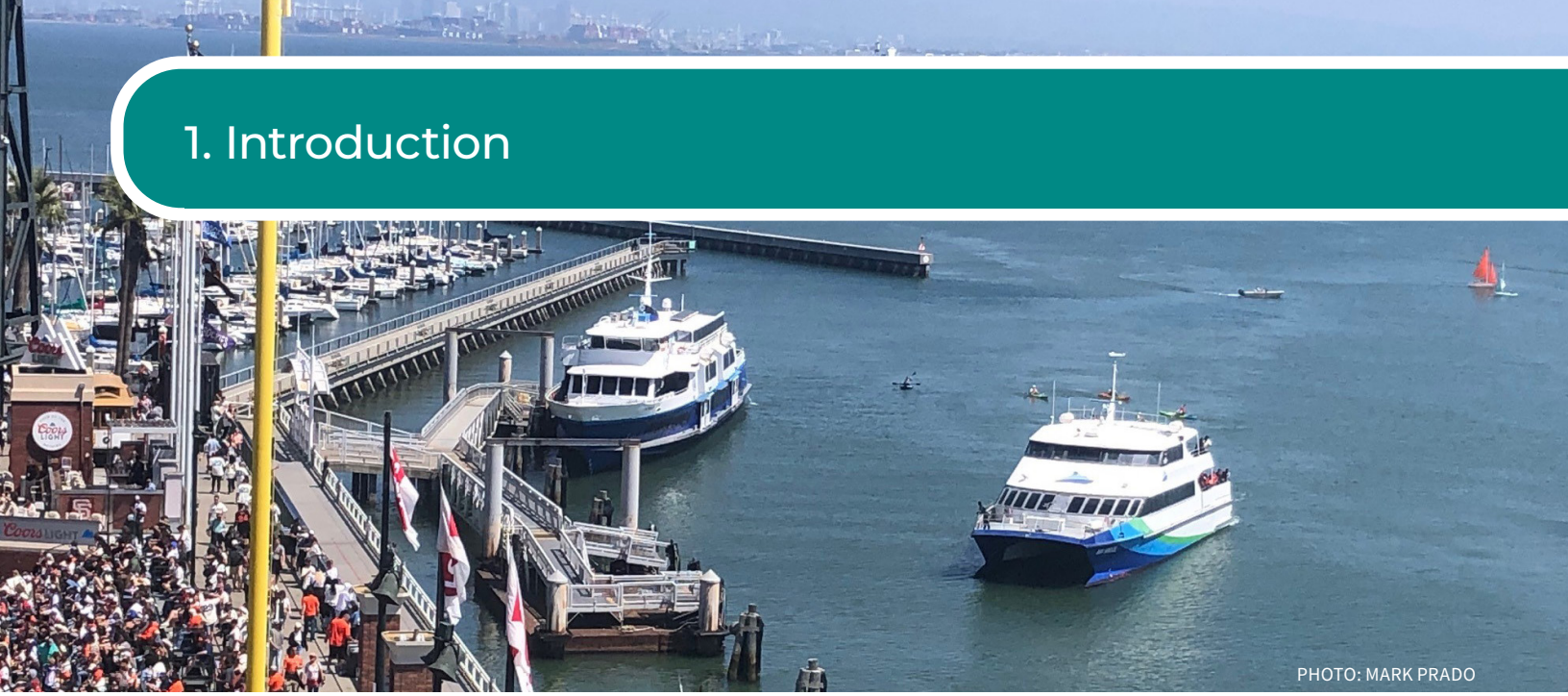


PHOTO: MARK PRADO

The Bay Area's Transit Network Faces Both Old and New Challenges

The COVID-19 pandemic resulted in drastic declines in Bay Area transit ridership that have yet to recover to previous levels on most systems, particularly for commute-oriented transit services, due to changes in how Bay Area residents work and travel. But even prior to spring 2020, transit service that was sometimes infrequent, slow, unreliable, disconnected or unsafe posed serious challenges for transit customers and made transit a less attractive option than driving alone. The Bay Area's auto-oriented land use and development patterns make transit stops and stations difficult to access for pedestrians and cyclists and negatively impact transit's efficiency and effectiveness. Inadequate transit service particularly affects disadvantaged and vulnerable populations, including households with low incomes, youth, older adults and people with disabilities, many of whom rely on transit as their primary means of transportation.

A history of insufficient funding for transit operations, compounded by the drastic decline in fare revenue caused by the COVID-19 pandemic, has led to significant financial shortfalls that threaten the day-to-day operations of the Bay Area's current transit network. Bay Area transit's slow ridership and fare recovery is resulting in much lower anticipated revenues over the current 25-year long-range planning horizon. Lower anticipated revenues, combined with increasing labor, operating and capital costs, challenges the Bay Area's ability to maintain the current system, let alone deliver service expansions, service increases and other investments focused on improving customers' experiences and increasing ridership.

To address these challenges, the Metropolitan Transportation Commission (MTC) convened the Blue Ribbon Transit Recovery Task Force in May 2020. The 32-member Task Force brought together local and state elected officials as well as advocates for people with disabilities, transit agencies, business and labor groups, and transit and social justice advocates who ultimately developed the Bay Area Transit Transformation Action Plan (TAP).[8] TAP implementation actions included developing a plan to improve transit network connectivity throughout the Bay Area. MTC in 2023 initiated Transit 2050+ in partnership with the Bay Area's transit agencies to complete a comprehensive update of Plan Bay Area 2050+'s transit strategies and investments with an overall focus on better transit network connectivity and service improvements for transit riders.

As a critical first step in ensuring the successful operation and improvement of the Bay Area's transit network now and into the future, MTC and its partners are working to identify and secure funding for transit service and rider improvements. In September 2025, MTC and its partners secured enabling legislation for a potential November 2026 regional transit funding ballot measure that would provide some of the resources necessary to sustain and improve the Bay Area's transit network.

Transit 2050+: Rethinking the Bay Area's Transit Strategies

Transit 2050+ is a comprehensive update of regional transit strategies that seeks to address the challenges described in the last section by identifying near- and long-term investments that will:

- Improve transit network connectivity throughout the nine-county Bay Area.
- Recover and grow transit ridership and increase transit mode share.
- Improve transit reliability and average operating speeds.
- Reduce barriers to using transit.

For the first time, MTC and transit agencies co-led the development of the regional plan's transit strategies. The transit strategies developed through Transit 2050+ and ultimately woven into Plan Bay Area 2050+ identify investments in transit service, infrastructure and other programs that aim to deliver a more robust, connected Bay Area transit network and improve the transit customer experience through complementary investments in fare integration, regional mapping and wayfinding, safety and security, and accessibility improvements for people with disabilities.

8 More information about the Blue Ribbon Transit Recovery Task Force and the Bay Area Transit Transformation Action Plan is available at https://mtc.ca.gov/about-mtc/committees/interagency-committees/blue-ribbon-transit-recovery-task-force.

This report describes the development and outcomes of Transit 2050+ and is organized as follows:

Chapter 2: Background and Planning Approach describes the key challenges and issues the Transit 2050+ planning effort sought to address and the relationship between the Bay Area Transit Transformation Action Plan, Transit 2050+ and Plan Bay Area 2050+. It also provides an overview of the approach used to develop the Transit 2050+ Network, including how MTC partnered with Bay Area transit agencies throughout Transit 2050+'s development, including on the identification of its goals and outcomes, and determining key technical inputs.

Chapter 3: Identifying Needs, Gaps and Opportunities describes the Needs, Gaps and Opportunities Analysis conducted for Transit 2050+. The analysis identified 2023 (i.e., existing) transit needs and developed new project concepts where known transit service and/or capital projects did not already address an identified deficiency or gap in transit service or slower than average transit operating speeds.

Chapter 4: Evaluating Project Performance describes the Project Performance Assessment, a federally-required analysis that evaluates the potential future benefits and limitations of proposed regionally significant transportation projects (defined as projects with total costs of $250 million or more) the vast majority of which are transit capital or service expansion projects in the nine-county Bay Area.

Chapter 5: Developing the Transit 2050+ Network details the key steps and inputs the project team (i.e., the transit agency-led Project Management Team, MTC staff and the consultant team) used to develop the Transit 2050+ Draft and Final Network. This chapter provides further detail on how non-governmental partner organization and public feedback was used in developing the Transit 2050+ Network as well as the guiding principles and other key inputs used by the project team.

PHOTO: NOAH BERGER

Chapter 6: The Transit 2050+ Network describes the transit strategies, including the programs and projects contained within them, that would help local and regional transit agencies build a more connected, reliable and effective regional transit network. This chapter also describes the key improvements that would result for riders from the implementation of the Transit 2050+ Network.

Chapter 7: Transit 2050+ Network Performance Assessment provides a quantitative assessment of the Transit 2050+ Network to enable the public, decisionmakers and stakeholders to understand how implementation of the transit strategies and investments that make up the Transit 2050+ Network could affect future outcomes for the Bay Area, including forecasted changes in transit ridership and mode share.

Chapter 8: Transit 2050+ Implementation describes near-term actions that MTC and its partners can undertake within the next five years to advance implementation of the Transit 2050+ Network.

Chapter 9: Conclusion summarizes the key benefits that implementing the Transit 2050+ Network could provide and reiterates the need for ongoing partnership to overcome barriers to successful implementation.

How is Transit 2050+ different from other state and regional transit plans and policies?

Transit 2050+ is a long-range plan for maintaining and improving the Bay Area's transit network. The Transit 2050+ Network, which includes strategies to operate and maintain the existing transit system, improve the transit customer experience, and enhance and expand transit service, was incorporated into the Transportation Element of Plan Bay Area 2050+, the Bay Area's long-range regional plan.

While Transit 2050+ provides a comprehensive set of long-range transit strategies for the Bay Area, MTC is also working with the region's transit agencies, local jurisdictions and the California Department of Transportation (Caltrans) on implementing the following near-term policies and action plans focused on improving transit operations and access:

- **The** Caltrans Director's Transit Policy (2026) serves as a high-level guide that outlines the Department's commitment to supporting public transit on the state highway system by setting internal Caltrans transit policies and processes along Caltrans rights-of-way. Caltrans will develop an accompanying implementation plan for the policy with specific steps and actions.
- **The** Caltrans District 4 Transit Plan (2025) identifies transit priority and access needs on the state transportation network and provides a best practices toolkit for improving transit access and operations on state-owned roadways in the Bay Area. Transit priority improvements support transit speed, reliability and cost effective operations by enabling transit vehicles to bypass traffic congestion on roadways.
- **The** Bay Area Transit Priority Policy for Roadways (2026, MTC) seeks to enhance the transit rider experience by supporting implementation of transit priority infrastructure and policies and promoting the interagency coordination required to do so.
- **The** Transit Priority Roadway Assessment (forthcoming, MTC) will complement the Transit Priority Policy for Roadways by evaluating the need for — and guiding future investments in — transit priority projects in the Bay Area. It will include an assessment of existing transit operations and develop a Transit Priority Network to inform regional transit priority investments.

2. Background and Planning Approach

PHOTO: KARL NIELSEN

The COVID-19 pandemic resulted in fundamental changes in the way many Bay Area residents work and travel. While the persistence of hybrid and remote work has provided people with more flexibility and job opportunities, transit ridership and fare revenues remain considerably lower than pre-pandemic, even as operating and capital costs continue to rise.

The Bay Area's future looks quite different than it did in 2021 when MTC and the Association of Bay Area Governments (ABAG) adopted the region's most recent long-range plan, Plan Bay Area 2050, and as a result a comprehensive rethinking of the plan's transit vision was needed. Transit 2050+ sought to address that critical need by creating a fiscally constrained transit plan while leveraging a new approach: connected network planning.

Plan Bay Area 2050: Preparing for an Uncertain Future

Every four years, federal and state laws require that MTC and ABAG update the long-range regional plan, known as Plan Bay Area. This plan serves as the Bay Area's Regional Transportation Plan and Sustainable Communities Strategy[9] and integrates land use and transportation planning. To date, MTC and ABAG have adopted three such regional plans, with the latest iteration, known as Plan Bay Area 2050, adopted in October 2021. Plan Bay Area 2050 was the most comprehensive regional planning effort to date, assessing the resilience of policies and investments under divergent future scenarios and introducing a set of 35 strategies across four elements: transportation, housing, economy and the environment.

The transit strategies included in Plan Bay Area 2050's Transportation Element anticipated that pre-pandemic travel behavior and transit ridership would rebound by mid-decade (2025), much sooner than currently forecast. While the plan introduced new strategies such as schedule coordination at regional transfer hubs and an integrated transit fare structure across agencies, the transit strategies also focused on building a next-generation transit network that included infusing tens of billions of dollars into modernizing and expanding transit and included new rail lines, a new transbay rail connection and an expanded express bus service network. While some long-term transit needs remain, a very different post-pandemic environment — where higher rates of hybrid and remote work have persisted and with less funding for transit operating and capital needs — required the development of a new transit modal plan that could inform substantive changes to these transit strategies.

PHOTO: KARL NIELSEN

9 California Senate Bill 375 (Chapter 728, Stats. 2008) requires regional metropolitan planning organizations in California to develop Sustainable Communities Strategies (SCS), or long-range plans, which align transportation, housing and land use decisions toward achieving greenhouse gas emissions reduction targets set by the California Air Resources Board (CARB).

Transit Transformation Action Plan: The Impetus for Transit 2050+

In 2020, MTC convened the Blue Ribbon Transit Recovery Task Force (Task Force), which included representatives from transit agencies; local, state and regional agencies; business and labor; and advocacy organizations to address the COVID-19 pandemic's significant impacts on public transit across the Bay Area. In July 2021, the Task Force released the Bay Area Transit Transformation Action Plan, which included a set of 27 actions designed to set a course for Bay Area transit's recovery and long-term improvement.[10] Action 18 called for a new Connected Network Plan for the region, as described below:

> *18. Fund, develop and adopt a Bay Area Connected Network Plan that includes transit service and hub categories, core service networks (such as Rapid Transit), funding requirements and next steps.*

Simultaneously, due to the continued financial challenges faced by transit agencies, the slow recovery of transit ridership and the need to re-evaluate legacy (i.e., pre-COVID pandemic) transit projects, transit agencies and other non-governmental partner organizations expressed interest in refreshing the region's transit strategies in the next regional plan update, Plan Bay Area 2050+. To avoid crafting two conflicting transit visions for the Bay Area, MTC staff recommended that the core elements of the Connected Network Plan be developed through the Transit 2050+ process.

What is a Connected Network Plan?

Currently, over two dozen different agencies provide transit service in the Bay Area. Some agencies, like BART, SMART, Caltrain or AC Transit, serve multiple cities and counties, but many other agencies focus on local transportation needs and provide service to a single city, a single county or several cities within the same county. This can sometimes lead to "gaps" in transit service for people who use transit to travel between multiple cities and counties. Service gaps can include no service between two areas, but more often gaps reflect insufficient service levels (i.e., frequency) given the demand between origins and destinations. Additionally, services from different agencies may not be well coordinated, leading to long transfer or wait times for riders reliant upon multiple transit agencies to complete their trips. Lastly, gaps can exist in terms of travel speed and, by extension, travel times, as congested roadways can impede the ability of bus operators to offer a time-competitive alternative to the car.

Connected network planning is when transit agencies work together to coordinate and plan their services to better meet transit customers' needs. It can happen at both regional and subregional levels. The connected network planning approach used for Transit 2050+ focused on identifying existing travel needs and gaps between major origins and destinations throughout the Bay Area. Transit agencies were consulted to inform recommendations on how to close those gaps to improve regionwide transit connectivity and make transit a viable transportation option for more people.

10 More information about the Blue Ribbon Transit Recovery Task Force and Transit Transformation Action Plan is available at https://mtc.ca.gov/about-mtc/committees/interagency-committees/blue-ribbon-transit-recovery-task-force.

Collaborative Planning Approach

The Transit 2050+ process began in winter 2023 and was led by both an MTC and transit agency co-project manager as well as a Project Management Team (PMT) comprised of staff from both large and small Bay Area transit agencies.[11] This co-project management approach enabled a more coordinated and collaborative re-envisioning of the transit network and its composite strategies, within the context of limited future funding.

Partnering With the Region's Transit Agencies

The Project Management Team met biweekly throughout Transit 2050+'s development and provided guidance and feedback on both the planning approach and key work products. The PMT included representatives from 12 Bay Area transit agencies, including all seven of the largest regional transit agencies and five smaller agencies (**Table 1**):

Table 1. Participating Bay Area transit agencies.

Bay Area Transit Agencies Representatives	Agency Size
Alameda-Contra Costa Transit District (AC Transit)	Large
Bay Area Rapid Transit District (BART)	Large
Caltrain	Large
Central Contra Costa Transit Authority (County Connection)	Small
Golden Gate Bridge Highway and Transportation District (Golden Gate Transit)	Large
Napa Valley Transportation Authority (Vine Transit)	Small
San Francisco Municipal Transportation Agency (Muni)	Large
San Mateo County Transit District (SamTrans)	Large
Santa Clara Valley Transportation Authority (VTA)	Large
Sonoma Marin Area Rail Transit (SMART)	Small
Tri Delta Transit	Small
Water Emergency Transportation Authority (San Francisco Bay Ferry)	Small

The co-project managers also sought feedback on key work products from transit agency general managers and the MTC Regional Network Management Council, which includes executive leadership from transit agencies and MTC, throughout the duration of Transit 2050+.

11 Transit agencies are generally defined as "large" or "small" based on the levels of transit service provided, levels of transit ridership, and size of agency budget.

Coordination With County Transportation Agencies and Other Stakeholders

While the Transit 2050+ project team worked directly with multi-county transit agencies to gather project details, County Transportation Agencies (CTAs) in all nine Bay Area counties also played a critical role in identifying local priorities and coordinating with smaller transit agencies. The Transit 2050+ project team engaged with CTA staff and executives on key work products, including through a series of county-level meetings in summer 2024 to review the Transit 2050+ Draft Network.

MTC also hosted two rounds of technical workshops for partner agencies and organizations in summer 2023 and fall 2024 as part of broader engagement efforts for Plan Bay Area 2050+. In summer 2023, workshops focused on introducing the Transit 2050+ planning effort and sharing the goals and desired outcomes established by the Transit 2050+ Project Management Team. In fall 2024, workshops sought feedback on the Transit 2050+ Draft Network and potential implementation actions for the first five years after Plan Bay Area 2050+'s adoption.

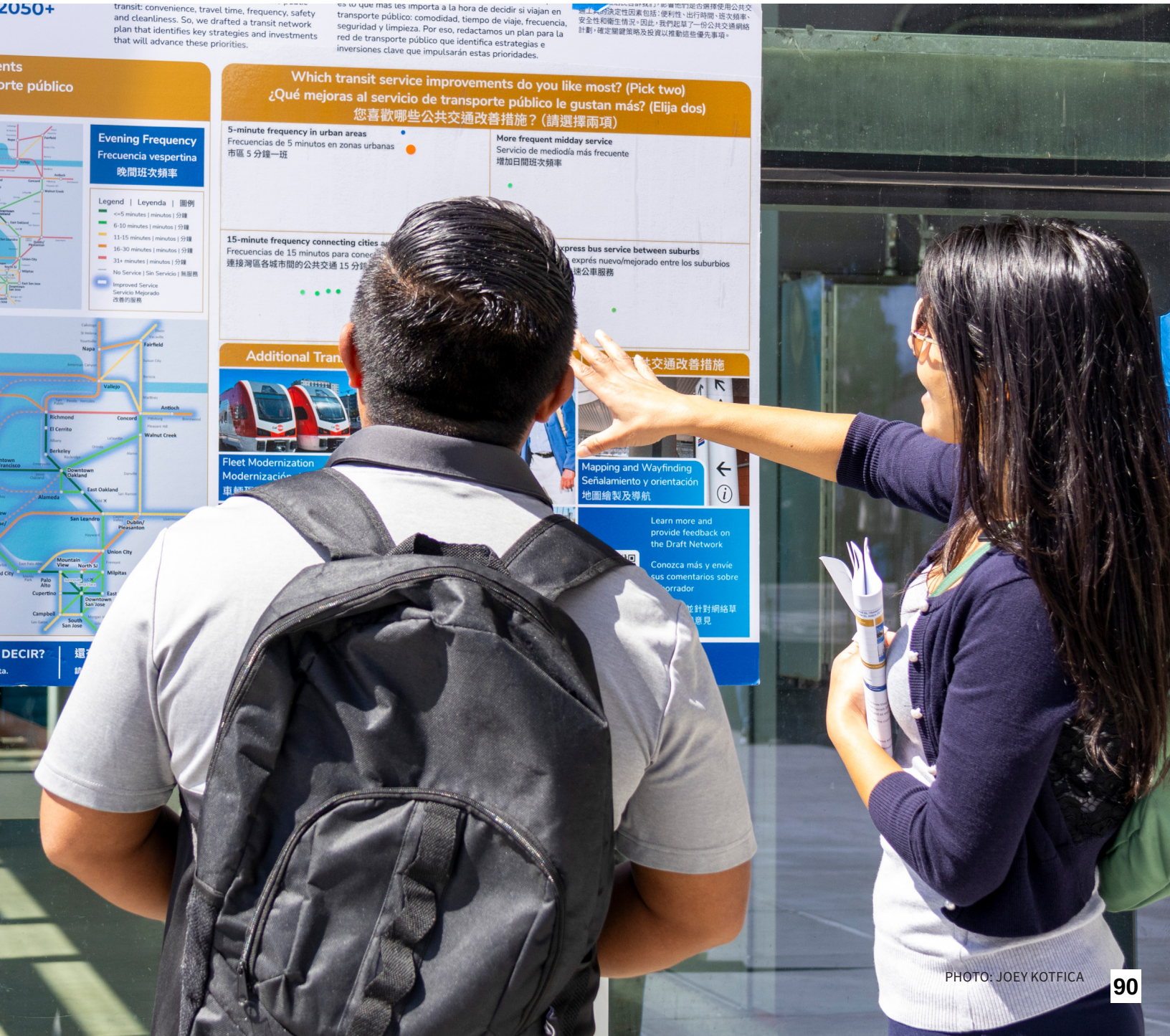


PHOTO: JOEY KOTFICA

Engaging the Public

Transit 2050+ public engagement focused on informing the public about the Transit 2050+ planning process, gathering information about people's current travel needs and preferences and seeking feedback on priorities for improving transit in the Bay Area. MTC gathered input via two rounds of public engagement conducted jointly with the parallel Plan Bay Area 2050+ effort in summer 2023 and summer 2024.

Outreach in 2023 asked participants how the "new normal" after the COVID-19 pandemic was impacting their lives. This included a public survey available in English, Spanish, Chinese and Vietnamese, and pop-up workshops in 15 communities across all nine Bay Area counties.

The second engagement round in 2024 focused on introducing the Transit 2050+ Draft Network to the public and sought public feedback on which transit strategies and investments to prioritize. A combined 13,800 residents and partner agencies participated in pop-up events, an online survey, a webinar and two technical workshops. MTC partnered with 17 community-based organizations (CBOs) to expand outreach in Equity Priority Communities, resulting in additional pop-up events, discussion groups and community presentations. CBO-led outreach elevated the voices of youth, older adults, people with disabilities and residents with low incomes.

The Transit 2050+ project team also sought feedback from the MTC Policy Advisory Council, a 27-member group that advises MTC on transportation policies and brings forward a range of environmental, economic and social equity perspectives. A detailed description of Plan Bay Area 2050+ engagement is available in the Plan Bay Area 2050+ Engagement Report.

Key Themes From Partner and Public Engagement

The project team incorporated feedback from partner agencies and the public during development of the Transit 2050+ Draft and Final Networks. The following key themes that emerged from the multiple rounds of engagement were reflected in the strategies and investments included in both the Draft and Final Networks.

Safety, security and cleanliness on transit vehicles, at stops and in stations were a priority for nearly all members of the public and other stakeholders. Safety, security and cleanliness were particularly important for youth, those who depend on transit for most of their trips and for those who reported riding transit less frequently. Participants expressed support for investments in better lighting, additional staffing and security infrastructure.

Improving the frequency of transit service and reducing travel times were also high priorities for the public and stakeholders. Participants who relied on transit expressed strong support for frequency improvements on local transit lines and in more suburban locations where service is often less frequent. Participants also wanted faster trip times, including improvements that would prevent buses from getting stuck in traffic, and a shortening of transfer and wait times.

Fare integration and reducing the costs of fares could improve transit affordability and accessibility. Participants wanted to reduce transfer costs and see further implementation of daily/monthly passes, family fares and the ability to pay fares directly with debit/credit cards.

Expanding service to close gaps; providing longer hours of service; extending service to locations with little or no transit service; and improving first-last mile connections to rail, ferry and express bus service could improve transit connectivity. Participants, particularly in the North Bay and more suburban locations, expressed a need for expanding transit routes and service hours.

Equity should be a key consideration. Both the public and stakeholders expressed the need to center equity when planning and prioritizing transit improvements. This includes prioritizing the needs of households with low incomes, people with disabilities, seniors, youth and others who rely on transit.

Goals and Desired Outcomes

Over a series of workshops and meetings in spring 2023, the Transit 2050+ PMT created draft goals and desired outcomes to guide the Transit 2050+ process. To develop the goals and desired outcomes, the PMT started by creating a problem statement to clearly identify the issues and concerns they thought Transit 2050+ should address. The PMT also incorporated the Transit Transformation Action Plan's problem statement and action plan.

The PMT in fall 2023 finalized the goals and desired outcomes, listed in **Table 2,** after incorporating feedback from the MTC Policy Advisory Council and Planning Committee in June and July 2023. These goals also served as the framework for the performance metrics used in the Network Performance Assessment described in Chapter 7.

Table 2. Transit 2050+ goals and desired outcomes.

Transit 2050+ Goals	Desired Outcomes for Each Goal
1. Develop an integrated, well-connected transit network that: • Improves access, particularly for equity priority and transit-reliant populations. • Improves connections between different transit modes and agencies. • Enables transit to be the preferred mode of travel for more types of trips.	• Increase the number and share of all Bay Area jobs that are accessible via a 45-minute transit trip (including access, transfer and wait time).
2. Recover and grow transit ridership and mode share.	• Increase transit ridership. • Increase transit mode share for commute and non-commute trips. • Reduce personal vehicle miles traveled (VMT) and its environmental impacts (i.e., greenhouse gas emissions).
3. Improve the reliability and average travel speed of transit service.	• Reduce transit versus auto travel times between representative origin-destination pairs. • Increase the average travel speed for surface transit relative to average auto travel speed on select roadway segments. • Improve reliability.
4. Reduce barriers to using transit, including: • Long and/or unpredictable wait or transfer times • Lack of accurate, readily available real-time transit vehicle arrival information • Insufficient safety and security at stops, stations, and on transit vehicles • Insufficient customer information, wayfinding and other signage • Lack of universal design features at stops and stations	• Increase customer satisfaction. • Increase the percentage of transit stops providing at-stop traveler information. • Decrease the number of reported safety and security incidents in the Bay Area transit system (vehicles and facilities). • Increase the percentage of stops and stations fully equipped with universal design features.

Technical Inputs

To allow for seamless integration of the Transit 2050+ Final Network into Plan Bay Area 2050+, the two planning processes shared key technical assumptions and inputs.

Financial Assumptions

MTC updated the estimated amount of funding needed to operate and maintain the existing transportation system, including transit operations and asset maintenance to maintain existing (2023) levels of service and comply with state mandated zero-emission vehicle requirements. The transportation needs forecast for Plan Bay Area 2050+ identified a total of $257 billion needed to maintain the existing transit system, split between operating and capital needs.[12]

MTC updates the transportation revenue forecast for each Plan Bay Area cycle based on current conditions, existing and potential local and regional funding sources, and the potential availability of state and federal funding. The forecast anticipates that major new revenue sources will become available from parking, roadway and congestion pricing as well as a regional transit funding ballot measure, particularly in the later years of the Plan Bay Area 2050+ planning horizon.

After accounting for other transportation operating and maintenance needs, as well as other non-transit transportation expansions and enhancements, the estimated funding available for transit enhancement and expansion is $82 billion, with approximately one-third ($27 billion) anticipated to be available by 2035[13] and the remaining amount ($55 billion) expected to be available in the later years of the plan (2036 through 2050).

Project Definitions and Costs

MTC solicited transportation project and program proposals for inclusion in both Transit 2050+ and the Plan Bay Area 2050+ Transportation Element through a collaborative, multi-phase process.[14] County Transportation Agencies, transit agencies and other multi-county project sponsors submitted projects for consideration in 2023 and 2024.

Project sponsors provided project cost estimates that included capital, operations and maintenance costs. MTC and Arup, an independent consultant, performed a cost audit on regionally significant transit projects, which are defined as projects with total costs of $250 million or more. The audit estimated costs using a uniform methodology that relied on work breakdown structure with per-unit cost estimates for project components. The cost audit sought to ensure that project cost estimates used in subsequent benefit-cost analyses were consistent across all projects. MTC reviewed any cost discrepancies identified by the cost audit with project sponsors who then updated project scopes and/or costs, if needed.

12 The Plan Bay Area 2050+ Technical Assumptions Report provides additional details on both the needs and revenue forecast and development of project definitions and costs.

13 This includes anticipated revenue from a potential new regional funding measure to support transit operations and rider-focused improvements.

14 The Plan Bay Area 2050+ Technical Assumptions Report provides additional details on the project solicitation and review process.

3. Identifying Existing Needs, Gaps and Opportunities

PHOTO: NOAH BERGER

In alignment with connected network planning principles, Transit 2050+ included a first-ever Needs, Gaps and Opportunities Analysis. This phase of the planning process assessed 2023 (i.e., existing) travel patterns and transit service levels, land use and sociodemographic characteristics, and transit operating speeds along the links connecting hubs or nodes of regional significance.[15] It then identified potential transit service needs or gaps and developed new project concepts where known transit service and/or capital projects did not already address an identified gap in transit service or transit operating speeds. **Appendix 1**[16] provides a detailed, technical description of the analysis that is summarized in this chapter.

15 Hubs or nodes represent significant regional transfer or terminal points, which could either be a singular place or a cluster of nearby places. Links represent conceptual connections between nodes, which could consist of multiple transit lines connecting different hubs or nodes.

16 Appendices are available online at: https://planbayarea.org/finalplan.

Because the Needs, Gaps and Opportunities Analysis focused on identifying existing regional transit service and operating speed gaps between hubs or nodes of regional significance, it did not analyze local transit service needs in many locations, nor did it assess potential transit service needs related to capacity or overcrowding on specific transit lines. Transit projects that addressed local transit service needs and existing or future overcrowding were identified as part of the call for projects described in the prior chapter and considered during a subsequent phase of the Transit 2050+ Network development alongside projects identified through this analysis.

PHOTO: NOAH BERGER

Existing Needs and Gaps

To identify potential regional transit service needs and gaps, the analysis:

1. Identified hubs or nodes of regional significance across the Bay Area and the corridors that connect them. These hubs or nodes represented the locations that most people were traveling to or from across the region.
2. Analyzed travel patterns for all types of trips (e.g., work, school, shopping, etc.) between the geographic areas where the hubs or nodes are located. This analysis estimated the average number of people traveling between different locations throughout the Bay Area for four weekday time periods (AM and PM peak periods, midday and evening) for all types of trips.
3. Analyzed the levels of existing transit service between the hubs and nodes.
4. Assessed the potential demand for transit services based on travel patterns and population and employment densities, as well as the needs of historically transit-reliant populations, including residents of Equity Priority Communities.[17]
5. Compared the potential demand for transit services against existing transit service levels to identify potential transit service gaps across four weekday time periods: AM and PM peak periods, midday and evening.

Transit Service Needs and Gaps

Figure 2, on the following page, shows the hubs or nodes of regional significance and the links or corridors that connect them.[18] It also shows where the analysis identified transit service gaps during the four weekday time periods.

Of the 29 links that had a service level gap for at least one of the four time periods, 16 links had gaps in all four time periods. These include:

- Gaps in the North Bay between Solano, Napa and Marin counties and between Marin and Sonoma counties
- Gaps between communities on the San Francisco Peninsula from southern San Francisco to Santa Clara County
- Transbay gaps, including the Richmond-San Rafael Bridge, San Francisco-Oakland Bay Bridge, San Mateo-Hayward Bridge, Carquinez Bridge and Dumbarton Bridge

17 Equity Priority Communities are census tracts that have a significant concentration of underserved populations, such as households with low incomes and people of color. A combination of additional factors helps define these areas. More information is available at: https://mtc.ca.gov/planning/transportation/access-equity-mobility/equity-priority-communities.

18 To understand overall network connectivity, the project team created a conceptual map of regional nodes and links (i.e., generalized travel corridors) connecting these nodes. Nodes represented significant regional transfer/terminal points, which could either be a single place or a cluster of nearby places. Links represented conceptual connections between nodes, which could consist of multiple transit lines and/or travel corridors.

Figure 2. Existing (2023) transit service level gaps for AM, PM, midday and evening weekday time periods.

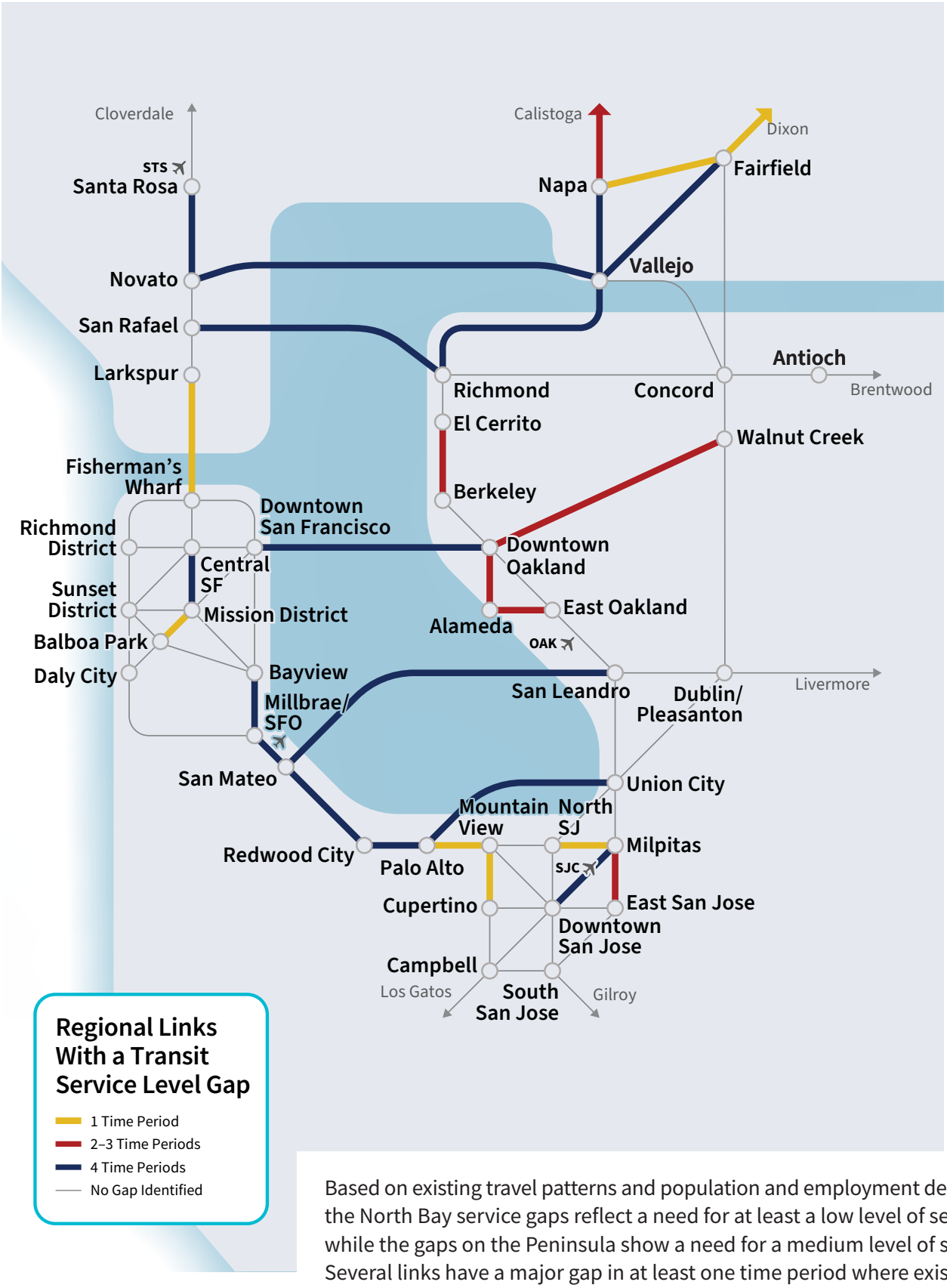


Figure Source: Fehr & Peers, 2023

Based on existing travel patterns and population and employment densities, the North Bay service gaps reflect a need for at least a low level of service, while the gaps on the Peninsula show a need for a medium level of service. Several links have a major gap in at least one time period where existing service may not be meeting potential demand. These include links between Downtown San Francisco and Downtown Oakland, Novato and Vallejo, and San Mateo and San Leandro.

PHOTO: KARL NIELSEN

Transit Operating Speed Needs and Gaps

To identify locations where traffic congestion slows down buses and light-rail vehicles and therefore may negatively impact transit operations and riders, the analysis:

- Identified corridors where buses or light-rail vehicles were traveling at an average speed of less than 12 miles per hour for arterial streets and less than 46 miles per hour for freeways during the weekday PM peak period from 3-7 p.m.
- Assessed transit ridership on these "slow speed" corridors to prioritize locations where slow transit operating speeds had the greatest impact on the greatest number of transit riders.

For arterial streets, the analysis found that transit vehicles generally got stuck in traffic in areas with higher intersection density such as the inner East Bay, Peninsula, South Bay and especially San Francisco, as shown in **Figure 3**[19] (on the following page). San Francisco had the highest concentration of arterial roadways with slower than average transit operating speeds, followed by Downtown Oakland, Berkeley and Downtown San Jose. Many of these gaps are found on multi-lane arterials that parallel major freeways or expressways.

Key gaps in San Francisco include Geary Boulevard, Mission Street, Van Ness Avenue and 19th Avenue. It is important to note that in dense, urban areas like San Francisco, achieving faster transit operating speeds may require more than just dedicated bus lanes. For example, San Francisco is exploring fully grade separated subway improvements along its busiest transit corridors like Geary and 19th Avenue.

In the East Bay, key gaps include San Pablo Avenue, MacArthur Boulevard and University Avenue. In San Jose, key gaps include North/South 1st Street, East/West Santa Clara Street and Story Road/Keyes Street/Willow Street. El Camino Real also consistently exhibits slow speeds along the entire Peninsula.

Slow freeway-running transit segments were among some of the very highest transit ridership segments in the Bay Area and were clustered around the Bay in San Francisco, Marin and the inner East Bay as shown in **Figure 4**[20] (page 27). These gaps were concentrated in San Francisco County, Marin and the inner East Bay, and represent five freeways: U.S. Highway 101, Interstate 280, Interstate 80, Interstate 580 and State Route 1.

19 The analysis included routes that serve more than one travel shed and roadway segments where the sum of passenger loads across transit routes is greater than or equal to 500 riders for Low to Moderate Transit Orientation sheds, 1,500 for High Transit Orientation sheds and 3,000 for Very High Transit Orientation sheds. Low operating speed segments (average PM period speed is less than or equal to 12 mph) are identified in red. The PM peak period is between 3 p.m. and 7 p.m.

20 The analysis included routes that serve more than one travel shed and freeway segments where the sum of passenger loads across transit routes is greater than or equal to 500 riders. Low operating speed segments (average PM period speed is less than or equal to 46 mph) are identified in red. The PM peak period is between 3 p.m. and 7 p.m.

Figure 3. Regional links with slow transit operating speeds on arterial streets during the weekday PM peak period.

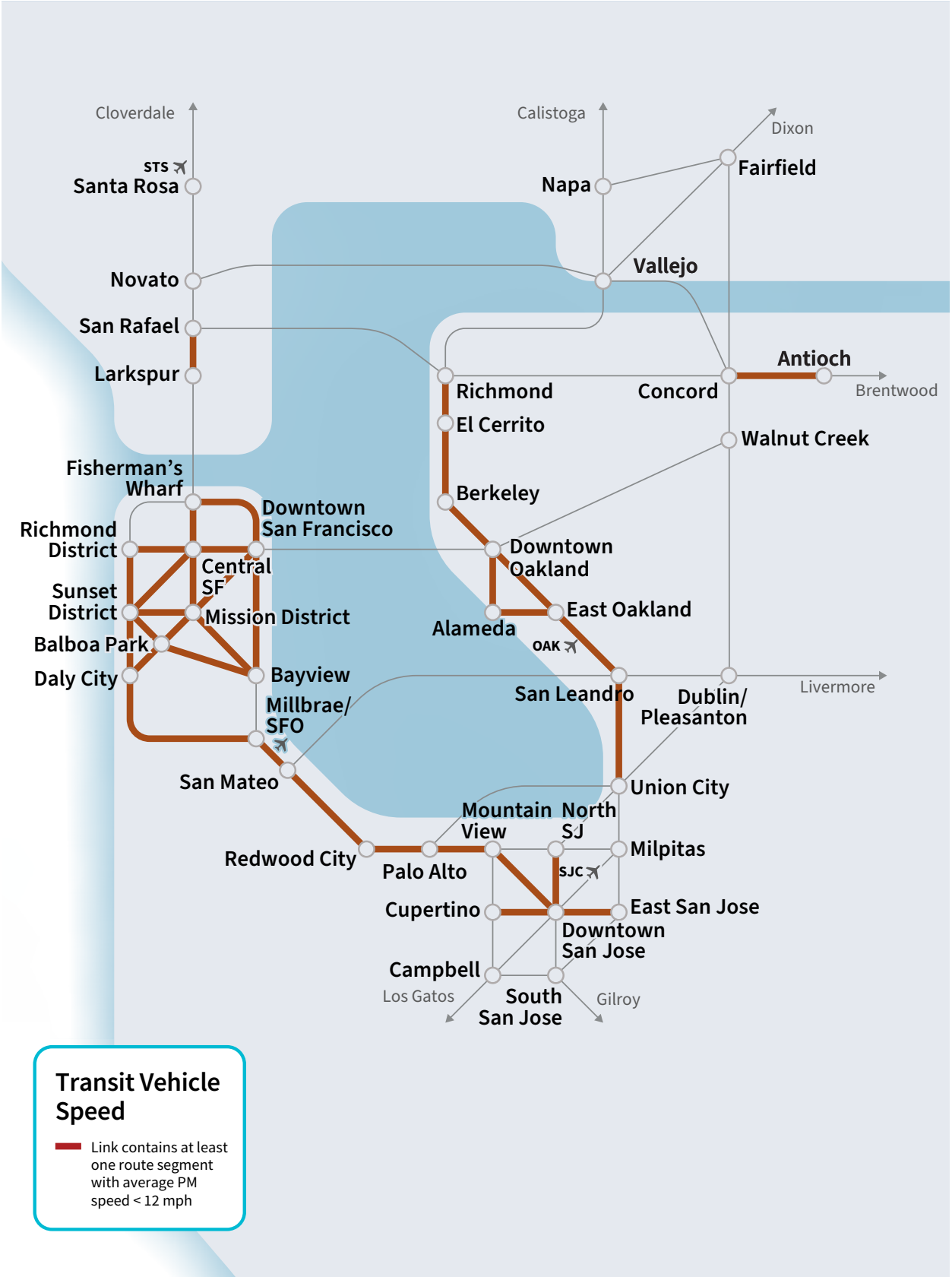


Figure Source: Cal-ITP, California Transit Speed Maps Project, April 2023; Fehr & Peers, 2023

Figure 4. Regional links with slow transit operating speeds on freeway segments during the weekday PM peak period.

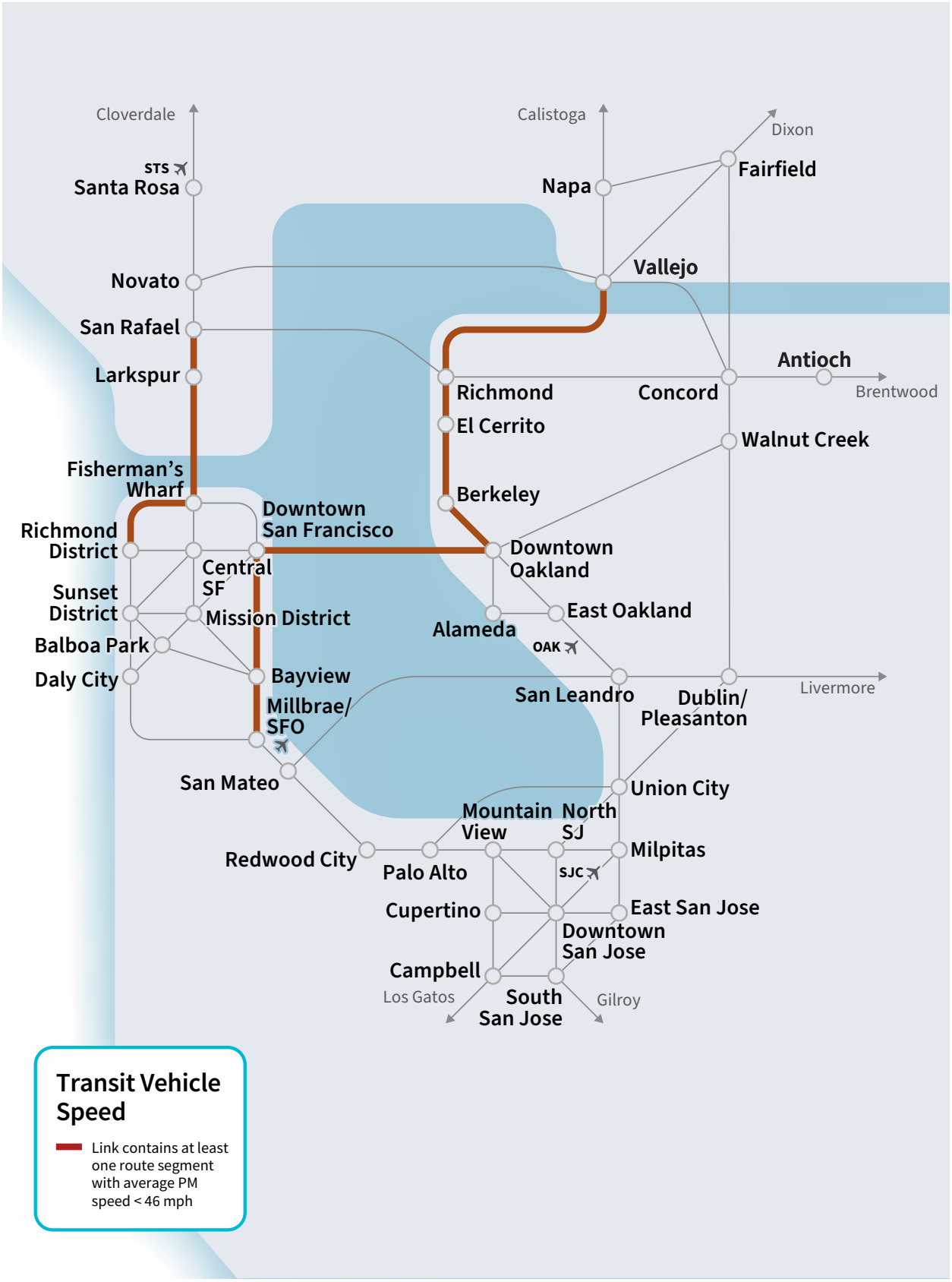


Figure Source: INRIX, April 2023; Fehr & Peers, 2024

Opportunities: Matching Gaps With Projects and Identifying New Project Concepts

To identify opportunities to close gaps and improve transit network connectivity, the project team compared the list of transit projects identified during the call for projects to the identified transit service and operating speed gaps. The project team applied the following assumptions when determining whether a project addressed an identified gap:

- For service gaps, a project that could improve service on a link for a time period with a gap was assumed to sufficiently address that service gap.
- For arterial speed gaps, a bus or light-rail transit priority project that could serve a slow speed link was assumed to address that gap.
- For freeway speed gaps, a project, including high-occupancy vehicle and toll lanes and bus-on-shoulder lanes, that could serve a slow speed link was assumed to address that freeway speed gap.

Of the 56 links with identified transit speed or service gaps (shown on **Figure 2**, **Figure 3** and **Figure 4**), 48 were addressed by a project submitted as part of the call for projects (i.e., projects included in Plan Bay Area 2050 or other local and county plans adopted subsequently to Plan Bay Area 2050). The PMT used these findings to identify and prioritize projects for inclusion in the Transit 2050+ Draft Network.[21]

For any transit operating speed gaps on arterial roadways that were not addressed by already identified projects, the project team identified where smaller-scale transit priority improvements could be applied to address these gaps. For any outstanding transit service gaps, the project team developed new project concepts to fill the remaining transit service gaps by reviewing existing transit routes and schedules; origin-destination screen line maps that showed the spatial distribution of trips; transit orientation; and existing roadway configurations.

The project team developed new project concepts to address two remaining service gaps along the San Mateo-Hayward Bridge and Dumbarton Bridge corridors:

- For the San Mateo-Hayward Bridge corridor, the project team identified an opportunity to add a new bus route connecting Castro Valley BART and Hayward BART with the Foster City and Hillsdale Caltrain Stations. While this project was included in the Draft Network, it was not ultimately included in the Transit 2050+ Final Network due to fiscal constraints and the need for further project development.
- For the Dumbarton Bridge corridor, the project team identified an opportunity to increase frequencies on the existing Dumbarton Express bus route and pair it with a new bus route between Union City, Ardenwood Park and Ride, Menlo Park, Stanford Redwood City Campus and Redwood City Caltrain. This project was included in the Transit 2050+ Final Network.

21 Although already identified projects could address most gaps, several service and operating speed gaps remained. The project team was unable to address two transit operating speed gaps on freeway segments between Marin and San Francisco counties and within San Francisco due to insufficient right-of-way for new transit-only or high-occupancy vehicle lanes.

4. Evaluating Transit Project Performance

PHOTO: KARL NIELSEN

While the Needs, Gaps and Opportunities Analysis identified existing transit network gaps across the Bay Area, the Project Performance Assessment helped show how major projects (whether locally or regionally identified) could meet transportation needs through 2050, while simultaneously fulfilling performance-based planning requirements established in federal law. By evaluating projects individually, this assessment provided information about how specific projects could enhance the existing transit network, including the benefits that an individual project could provide.

In contrast, the Network Performance Assessment, described in Chapter 8, assessed the potential combined future benefits that all the projects and investments included in the Transit 2050+ Final Network could provide.[22]

22 This chapter focuses on how the Project Performance Assessment informed development of the Transit 2050+ Network. The Plan Bay Area 2050+ Performance Report provides further details on overall plan performance as well as the Project Performance Assessment. For more information on how performance findings informed non-transit project selection, please see the Plan Bay Area 2050+ Transportation Project List Report.

Methodology Overview

Transit 2050+ leveraged the robust evaluation framework[23] established in Plan Bay Area 2050 (2021) for regionally significant transportation projects defined as projects with total costs of $250 million or more. Projects were evaluated under three divergent Futures[24] with differing demographic, economic and environmental assumptions to understand how different future conditions might affect project benefits.

The assessment had three components:

- **Benefit-cost assessment:** Evaluation of the benefits and costs of individual projects across three divergent 2050 Futures: Rising Rides, Falling Fortunes; Clean and Green; and Back to the Future. The benefit-cost ratio compared project benefits (e.g., improvements in regionwide accessibility; freeway reliability and vehicle ownership; transit crowding; emissions and natural land loss; and health and safety) to project lifecycle costs that included construction, operations and maintenance.
- **Equity assessment:** Evaluation of the potential distributive impacts of project-level accessibility benefits across income groups for three divergent 2050 Futures and whether projects provide a point of access,[25] such as a station or a new roadway facility, located within Equity Priority Communities.
- **Guiding principles assessment:** Evaluation of alignment with Plan Bay Area's five Guiding Principles — affordable, connected, diverse, healthy and vibrant — using specific project-focused criteria and flagging areas of potential concern.

Forty-one transit projects were evaluated as part of the Project Performance Assessment. These projects were grouped into two categories by project type:

1. **Enhance Transit Frequency, Capacity and Reliability (30 projects)**

   Projects in this category included:

   - Frequency improvements
   - Bus rapid transit
   - New ferry terminals
   - Infill stations
   - System modernization and capacity improvements
   - Express bus service improvements

2. **Expand Transit Services Throughout the Region (11 projects)**

   Projects in this category included:

   - Completion of phased service extensions
   - Expansions of the transit network to improve capacity and connectivity, including major capital "megaprojects" that would provide new regional and interregional transit connections

23 Documentation of the Project Performance Assessment methodology is available here: https://planbayarea.org/digital-library/memo-final-ppa-methodology-pba50pdf.

24 More information about the Futures is available here: https://mtc.ca.gov/sites/default/files/Horz_Futures_Report.web_.pdf.

25 The analysis indicates whether a project provides an access point (such as a station or new roadway facility) in an Equity Priority Community (EPC definition using both 2014–2018 and 2018–2022 ACS data). However, unlike the equity score, this does not reflect which population groups may actually benefit from the project.

Projects were considered cost-effective when the benefit-cost ratio was equal to or greater than one, indicating that benefits outweighed costs, especially across multiple divergent Futures. This approach enabled an "apples-to-apples" order of magnitude comparison across different types of major transportation investments, including both capital and service projects.

While the Project Performance Assessment served as an important tool in developing the Transit 2050+ Network, it is important to understand its limitations. Projects were assessed individually for consistency; however, some projects could have greater or lesser benefits if assessed as a package along with other projects in the same general vicinity or travel corridor. Further, this assessment did not capture certain economic benefits (e.g., land value or job agglomeration) that projects, such as major rail investments, may generate. It is also worth noting that the cost-benefit scores from the Project Performance Assessment are not directly comparable to project assessments for state or federal funding, as they reflect benefits under a range of future scenarios.

PHOTO COURTESY LAVTA

Key Findings

MTC staff produced a synthesis of findings at the conclusion of the Project Performance Assessment process that is included in **Appendix 2.**[26] These detailed tables show the benefit-cost ratios and equity scores across the three Futures as well as the Guiding Principles assessment for each project. The results also feature a breakdown of forecasted lifecycle benefits and costs of the projects. The following key findings from the assessment informed development of the Transit 2050+ Network.

Transit projects that enhance the existing system are generally more cost-effective than those that expand services to new locations. Twenty-six of the 30 projects that focused on enhancing the frequency, reliability and capacity of the existing transit network had benefit-cost scores of one or more in the Rising Tides, Falling Fortunes future compared to only five of the 11 projects focused on expanding the transit network. This finding reflects decades of prior investment in the Bay Area's relatively mature transit network and indicates that improvements which leverage or use existing transit infrastructure may provide significant benefits at a lower cost, making them better suited for near-term prioritization.

Lower-cost, less capital-intensive projects may be a safer bet in an uncertain future. Projects predominantly include those that boost frequencies or modernize existing infrastructure. These projects had benefit-cost ratios greater than one in all Futures, which indicates their resilience across scenarios. While some projects that expand service provide significant benefits, their higher capital costs adversely impact their benefit-cost ratios, particularly in a future where future job and population growth is not as robust. Capital-intensive transit expansion projects may still have an important role in supporting sustainable growth in the Bay Area, but they must be closely coordinated with land use planning and development, as well as complementary transportation strategies such as expanded road pricing, to maximize their potential benefits.

Using Project Performance Assessment Findings to Develop the Transit 2050+ Network

The PMT used findings from the Project Performance Assessment to prioritize transit service and capital projects for inclusion in the Transit 2050+ Draft Network, focusing on the benefit-cost analysis associated with the "Rising Tides, Falling Fortunes" Future and the Equity Priority Community "point of access" analysis. "Rising Tides, Falling Fortunes" best aligned with more conservative assumptions about population and job growth and other post-pandemic conditions. Furthermore, the geographic or "point of access" component of the equity analysis was simpler and easier to interpret than the more complex findings associated with distributive impacts by household income.

The Project Performance Assessment's overall finding that less costly, less capital-intensive frequency, reliability and capacity projects provided significant regionwide benefits informed the organizing principles for the Transit 2050+ Network, which will be discussed in Chapter 5.

26 The assessment included 13 additional non-transit projects that were evaluated as part of Plan Bay Area 2050+ but not within the scope of Transit 2050+.

5. Developing the Transit 2050+ Network

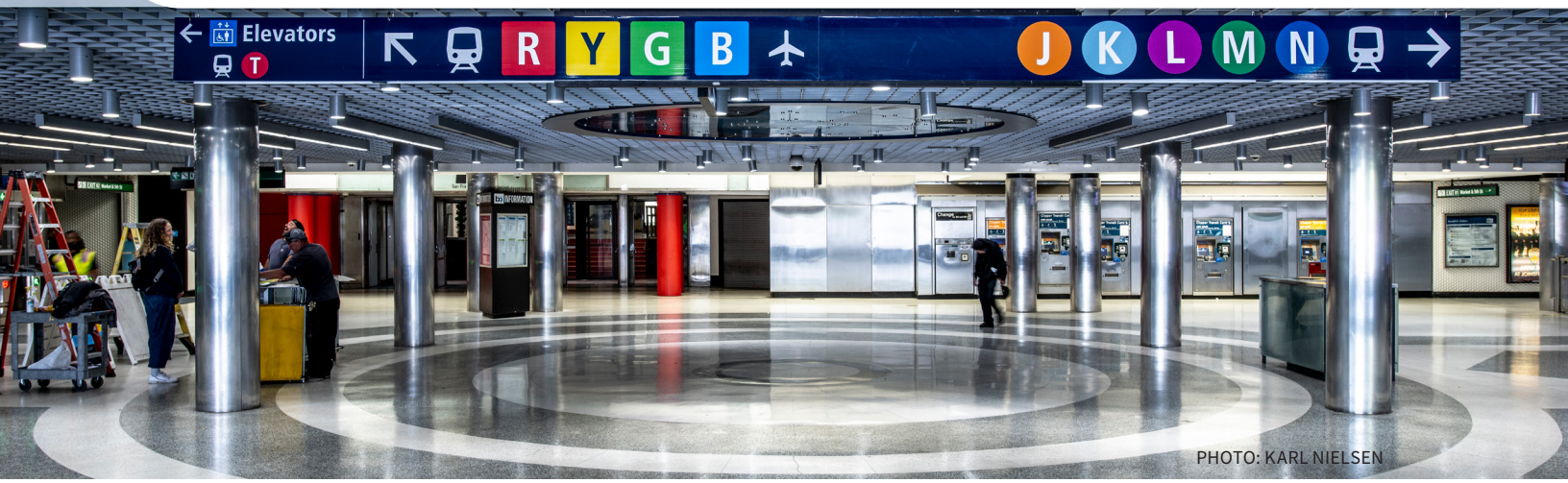


PHOTO: KARL NIELSEN

The Transit 2050+ goals and desired outcomes, input from the public, policymakers and partner agencies and findings from the Needs, Gaps and Opportunities Analysis and Project Performance Assessment all informed development of the Draft and Final Transit 2050+ Networks. The Transit 2050+ Network organizing principles, which focused on identifying near-term quick and impactful upgrades and long-term expansions for future generations, further shaped transit strategies and investment priorities.

Key Steps and Inputs in Developing the Transit 2050+ Network

Table 3 summarizes the key steps and inputs the transit agency-led Project Management Team, MTC staff and the consultant team used to develop the Transit 2050+ Draft and Final Networks.

Table 3. Summary of key steps and inputs in Transit 2050+ Network development.

Inputs	Draft Network (Summer 2024)	Final Draft Network (December 2024)	Final Network (January 2025)
Policymaker, Partner Agency & Public Feedback			
Goals, Desired Outcomes & Organizing Principles			
Existing Needs, Gaps & Opportunities Analysis			
Project Performance Assessment			
Other Considerations	• Review and feedback from Project Management Team • Geographic balance of investments across the transit network	• Incorporation of smaller-scale, non-regionally significant projects to develop group project listings • Final updates to project costs and scopes provided by CTAs and project sponsors	• Targeted county-level project adjustments to reflect local transit priorities

Organizing Principles for the Transit 2050+ Network

Building on the Transit 2050+ goals, desired outcomes, and partner agency and public feedback, the project team developed organizing principles to guide selection of specific service and infrastructure projects to include in the fiscally constrained Transit 2050+ Draft Network. The organizing principles prioritize lower-cost investments that have the potential to deliver significant benefits to transit customers during the first 10 years (2025 through 2035) of Plan Bay Area 2050+ when anticipated revenues available to fund improvements may be more limited. More costly, large-scale capital investments are prioritized for the later years (2036 through 2050) of the plan when higher levels of available revenue are anticipated.

Transit 2050+ Organizing Principles

Near-Term: "Quick and Impactful Upgrades"

Project Opening Year: 2025 through 2035

Types of investments prioritized:

1. Projects with more impactful and immediate benefits for Equity Priority Communities
2. Quick-build, lower-cost, and high-impact service enhancements; transit priority improvements; and improvements to customer experience and accessibility
3. Targeted capital (i.e., infrastructure) investments that improve operational efficiency/ effectiveness and better use existing infrastructure (versus expansion)

Long-Term: "Expansions for Future Generations"

Project Opening Year: 2036 through 2050

Types of investments prioritized:

1. Additional service enhancements, transit priority improvements and customer experience and accessibility improvements
2. Capital projects that improve system capacity, enhance connectivity and improve access (with a focus on growth and expansion)
3. "Transformative" capital projects that significantly expand or extend the transit network

Draft and Final Network Development

Using the goals and desired outcomes; initial partner agency and public feedback; findings from the Needs, Gaps and Opportunities Analysis; and the Project Performance Assessment, as well as the organizing principles, the project team developed the draft set of transit strategies — including transit service and infrastructure projects — that would ultimately form the Transit 2050+ Network. Strategies function as an organizing framework for the transit investments that make up the Transit 2050+ Network and enabled a smooth integration of Transit 2050+ into the broader Plan Bay Area 2050+ Transportation Element at the end of this modal planning process.

The project team sought feedback on the initial Draft Network from County Transportation Agencies and project sponsors as well as from the Regional Network Management Council and Policy Advisory Council in summer 2024. The project team incorporated feedback from this round of review before presenting the Draft Network to the MTC Planning Committee in September 2024. The second round of public and stakeholder engagement held in summer and fall 2024, described in Chapter 2, also focused on soliciting feedback on the key elements of the Transit 2050+ Draft Network.

Changes Made Between the Transit 2050+ Draft and Final Networks

Before finalizing the Transit 2050+ Network, the project team incorporated feedback from public and partner organization engagement in summer and fall 2024 and feedback from policymakers in fall 2024. The project team also held an additional meeting with the PMT to review the feedback received and request further input from transit agency representatives. Lastly, the project team incorporated updates to project definitions, costs and revenue assumptions.

The following key changes were made between the Draft and Final Networks:

Updated cost estimates reduced the estimated funding need for investments included in the strategy "Improve the Rider Experience Through Transit Network Integration" by approximately $2 billion, which allowed for greater investment in transit capital and service improvement projects in the Final Network.

Modification and phasing of some capital and service improvement projects by the project team in coordination with project sponsors. These changes were made in response to stakeholder and project sponsor feedback regarding modifications to project delivery timelines.

Addition of project investments to the Transportation Project List that were initially included in the Draft Network for project development only. Several of these projects had already advanced through initial project development stages and anticipated pursuing funding for construction and operations within the plan's 25-year timeframe.

Further consideration of local investment priorities resulted in modifications to transit project investments. In December 2024, the project managers presented the Transit 2050+ Final Network to the MTC Regional Network Management Council, Policy Advisory Council and Planning Committee. Two projects (the Redwood City Ferry and the SMART extension to Cloverdale) were added to the network based on feedback from committee members and regional stakeholders, recognizing that they were local priorities. These projects also addressed identified needs and gaps but had not initially been included in the Draft Network due to their higher capital costs (compared with alternative bus service projects). County Transportation Agencies worked with project sponsors to identify other projects within their county to remove or scale down to accommodate the additions within the financial constraints of the plan.

6. A Faster, More Frequent, More Connected Transit Network

PHOTO: KARL NIELSEN

The Transit 2050+ Network envisions a fast, frequent, reliable and connected transit network for the Bay Area. Implementation of the Transit 2050+ Network would result in substantial improvements to transit frequencies, speed, connectivity and reliability, as well as overall transit customer convenience and comfort.

The Transit 2050+ Network

Transit 2050+ envisions an approximately $340 billion investment in maintaining, enhancing and expanding the Bay Area's transit network over the next 25 years. Because of the Bay Area's expansive and relatively mature transit network, most of this investment, about $257 billion, will be used to maintain existing transit service and assets and implement state-mandated zero-emission bus regulations. The roughly $82 billion remaining will support improvements in and expansion of transit service throughout the Bay Area and programs to enhance the transit customer experience. Overall, the Transit 2050+ Network:

Increases frequency on most local and regional agencies for bus, rail and ferry services

In addition to frequency improvements, the Transit 2050+ Network also invests in new transit priority infrastructure like transit-only lanes and transit signal priority to make transit faster and more reliable.

Prioritizes lower cost, high impact investments in the near term

These lower cost, high impact investments include new and improved bus rapid transit, rapid bus, and express bus services as well frequency improvements on existing transit lines to accelerate ridership recovery in both the Bay Area's urban core and suburban areas.

Expands regionwide access by advancing high-priority rail projects

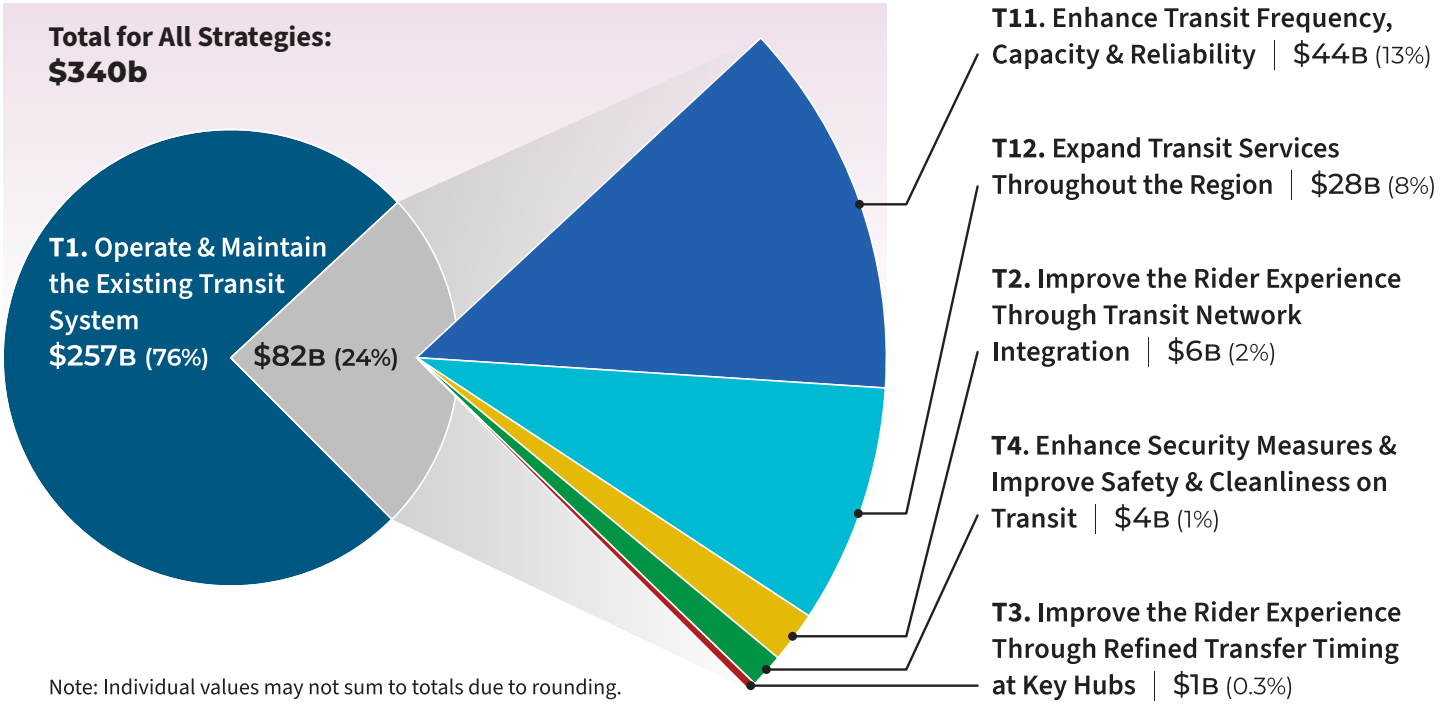
Projects such as BART to Silicon Valley Phase II and the Caltrain/High-Speed Rail Portal significantly enhance connectivity across the regional transit network, while projects like Valley Link and the SMART extensions to Healdsburg and Cloverdale expand access to high-quality transit to new communities.

Invests in regional programs that advance network integration and improve accessibility

These include improvements to safety, security and cleanliness; regional fare coordination and transfer timing; mapping and wayfinding; and improvements to paratransit and accessible transportation services for people with disabilities and older adults.

The project and programmatic investments that make up the Transit 2050+ Network[27] are organized into thematic strategies. A strategy is a public policy or set of investments that can be implemented in the Bay Area at the city, county, regional or state level over the 25-year plan horizon. **Figure 5** shows the strategies that comprise Transit 2050+ Network and their approximate funding amounts. The remainder of this chapter describes the strategies and the investments included within them. **Appendix 3**[28] includes an excerpt of the Plan Bay Area 2050+ Transportation Project List that was developed via the Transit 2050+ planning process and that provides additional information about the Transit Strategies (i.e., Strategies T1, T2, T3, T4, T11 and T12).

Figure 5. Transit 2050+ Network strategies and funding amounts (Year of Expenditure, $ billions).



Note: Individual values may not sum to totals due to rounding.

27 MTC and the ABAG Executive Board approved the Transit 2050+ Final Network as part of the Transportation Element of the Plan Bay Area 2050+ Final Blueprint on January 22, 2025.

28 Appendices are available online at: https://planbayarea.org/finalplan.

Strategies to Maintain Existing Transit Service

STRATEGY T1: Operate and Maintain the Existing System | $257B

Objective: Provide a strong base upon which new transportation strategies can build. This strong base includes ensuring that the region's road and transit assets are kept in a condition that is similar to what we have in the Bay Area today.[29]

In alignment with MTC's "Fix It First" policy, Strategy T1 prioritizes funding to maintain existing conditions for freeways, bridges, local streets, and transit assets and to operate the same number of transit service hours that were in operation as of 2023. This strategy includes investments that make transit stations and vehicles safer, cleaner and more accessible — with investments targeted at meeting the needs of transit-dependent or limited-mobility passengers. It also includes the transition to zero-emission transit vehicles, given new state requirements to decarbonize the public transit sector. The specific transit programs within this strategy include funding to:

- Operate the Bay Area's baseline transit services. Improvements include operations and routine preventative maintenance. Funding assumes and accounts for continuation of the regional means-based fare program, Clipper START. ($183 billion)
- Maintain and replace the Bay Area's baseline transit capital assets. Improvements include vehicle rehabilitation or replacement, reconstruction or renovation of transit buildings and structures, and rehabilitation or reconstruction of track. ($66 billion)
- Support and maintain the Bay Area's zero-emission fleet transition. Improvements include zero-emission transit fleets, facilities and vehicle rehabilitation or replacement. ($8 billion)

PHOTO COURTESY SAMTRANS

29 Note that only the transit portion of Strategy T1 is represented here. The full cost of operating and maintaining the Bay Area's existing transportation system is $380 billion.

Strategies to Improve the Transit Customer Experience

STRATEGY T2: Improve the Rider Experience Through Transit Network Integration | $6B

Objective: Increase ridership by making transit easier to navigate and use, while reducing the cost burden of taking transit for all riders, particularly those with low household incomes.

Strategy T2 funds regionwide initiatives intended to improve transit customers' experience through transit network integration. Investments include the implementation of a free and discounted inter-agency transfer policy with Next Generation Clipper and additional measures to move toward an integrated fare structure. Investments also include the development of regionally maintained tools, such as the Regional Mapping Data Services system, and the installation of new, more consistent transit signs. Paratransit investments include implementation of one-seat paratransit ride pilots across the region, full integration of Americans with Disabilities Act (ADA) paratransit services on Next Generation Clipper and additional reforms recommended by the Coordinated Public Transit-Human Services Transportation Plan. The specific programs within this strategy include funding to:

- Implement a free and discounted interagency transfer policy with Next Generation Clipper® and additional measures to move toward an integrated fare structure. ($3 billion)
- Develop regionally maintained tools, such as the Regional Mapping Data Services system, and the installation of new unified regional transit signs. ($1 billion)
- Implement one-seat paratransit ride pilots across the Bay Area, full integration of ADA paratransit services on Next Generation Clipper and additional reforms recommended by the Coordinated Public Transit-Human Services Transportation Plan. ($2 billion)

STRATEGY T3: Improve the Rider Experience Through Refined Transfer Timing at Key Regional Hubs | $1B

Objective: Increase the viability and attractiveness of transit by providing a more seamless experience for riders to transfer between different services at key transfer points throughout the Bay Area.

Strategy T3 funds service enhancements to facilitate schedule coordination and improved transfer timing at key regional hubs, while achieving synergies with co-located mobility hub investments funded elsewhere in Plan Bay Area 2050+. Investments include enhancements to the physical infra-structure at 15 key regional hubs to improve the transfer experience for transit riders and better connect riders to biking, micro-mobility and walking options. Investments also include short-term operating assistance and technical resources to allow for increased service for key transfer routes.

STRATEGY T4: Enhance Security Measures and Improve Safety and Cleanliness on Transit | $4B

Objective: Establish a safe, secure and clean environment for riders onboard transit vehicles and those waiting at transit facilities, while simultaneously reducing a key barrier to transit for all residents, particularly those currently less inclined to ride transit due to concerns about safety and cleanliness.

Strategy T4 funds improvements to safety and security measures as well as infrastructure related to transit stations, stops and vehicles. Investments include the installation of security cameras and improved lighting at stations and stops and additional improvements in facilities to support safety and security. Investments also include additional funding for security and police staff, non-sworn positions such as ambassadors and crisis intervention specialists, and janitorial and custodial staff. Additionally, investments will be dedicated to public awareness safety campaign programs.

Strategies to Enhance and Expand Transit Service

Specific transit service and capital projects are contained within the last two strategies, Strategy T11: Enhance Transit Frequency, Capacity and Reliability and Strategy; and T12: Expand Transit Services Throughout the Region. Strategies T11 and T12 include two types of projects:

- Named projects that add capacity to the transit network, including new lines, new stations and additional frequency on existing services
- Programmatic categories that group similar types of projects together and do not alter transportation system capacity, including replacement or preservation of transit assets

STRATEGY T11: Enhance Transit Frequency, Capacity and Reliability | $44B

Objective: Improve the vitality and viability of existing transit services throughout the Bay Area by providing increased frequency, improved reliability and greater capacity to reduce wait time, decrease travel time, and encourage ridership growth.

Strategy T11 funds service enhancements on existing transit systems and infrastructure that improve frequency, reliability and capacity throughout the Bay Area. Increased frequency and capacity on BART, Caltrain, Muni, AC Transit, VTA, San Francisco Bay Ferry, SamTrans and more will provide faster and more reliable regionwide travel options, while new stations and grade separations on BART, Caltrain and Capitol Corridor will increase access, safety and reliability. New bus rapid transit, express bus and ferry terminals in Berkeley and Redwood City will connect communities across the Bay Area, including in Alameda, Contra Costa, San Mateo, Santa Clara and Sonoma counties. Modernizations and expansions for local bus networks — including improved frequencies, longer spans of service, and priority treatments for Muni, VTA, AC Transit, SamTrans, County Connection, SolTrans, NVTA and Sonoma County operators — will help Bay Area residents travel within and between their communities.

Enhancements include both operational and capital investments in transit priority improvements that would decrease travel time for transit riders with a particular focus on serving Equity Priority populations. This strategy consists of both specific projects as well as programmatic investments that include funding for the following:

- Improvements to existing transit stations, centers and stops
- Smaller-scale investments in transit reliability, frequency and capacity
- Enhancements and modernization of transit facilities
- Rail grade separations and modernization improvements

STRATEGY T12: Expand Transit Services Throughout the Region | $28 B

Objective: Encourage a mode shift from personal vehicles to transit by providing reliable transit services to connect riders to areas of the Bay Area that have previously not been effectively served by existing transit options.

Strategy T12 advances and funds transformational capital projects that will expand the existing network to better connect communities throughout the Bay Area by serving new markets or currently underserved markets. These projects will seize on the opportunity to catalyze areas of population growth in the region, position the Bay Area for an increase in transit ridership and provide competitive alternatives to driving. These projects include:

- BART to Silicon Valley Phase II to downtown San Jose and Santa Clara ($13.5 billion)
- Caltrain/High-Speed Rail Portal to Salesforce Transit Center in San Francisco ($8.9 billion)
- Valley Link rail service from Dublin/Pleasanton to San Joaquin County ($3.1 billion)
- VTA Light Rail extension from Alum Rock to Eastridge in east San Jose ($0.7 billion)
- SMART extensions to Healdsburg ($0.3 billion) and Cloverdale ($0.4 billion) in northern Sonoma County

In addition to specific projects, this strategy also includes a programmatic category to fund transit studies and project development. Studies will identify service and capital improvements to address customer needs, improve the customer experience and increase transit ridership. Project development activities can include alternatives analyses, design and technical activities, and environmental review initiation.

PHOTO: KARL NIELSEN

Interregional Transit: California High-Speed Rail and Beyond

California High-Speed Rail is designed to connect the Bay Area, Central Valley and Los Angeles in under three hours. Approved by California voters in 2008, construction is underway in the Central Valley, where new viaducts are being built that will enable travel at more than 200 miles per hour. When completed, the project will allow Bay Area residents, commuters and visitors to reach destinations throughout California much faster while avoiding congested highways and busy airports. Importantly, high-speed rail (HSR) also aligns with state and regional climate goals, providing a lower-emissions alternative to driving or flying.

High-speed rail will create new opportunities for communities across the Bay Area, but none more so than in the four cities with HSR stations: San Francisco, Millbrae, San Jose and Gilroy. As Plan Bay Area 2050+ Growth Geographies, these hubs will provide the opportunity for new jobs and housing, along with affordable connections and easy access to destinations not just in the Bay Area but in the megaregion and beyond. When combined with the Bay Area's other interregional services, high-speed rail will provide new levels of connectivity across northern California. The Transit 2050+ Final Network also includes upgrades to Amtrak's Capitol Corridor and Altamont Corridor Express (ACE) and support for the new Valley Link service, which will expand access for Bay Area residents to Sacramento and San Joaquin County.

Because not every Bay Area resident will be able to live within walking or biking distance of these four HSR stations, existing regional rail systems like Caltrain, BART, VTA and Muni will provide connectivity at HSR rail hubs — creating a connected rail network across the Bay Area. Caltrain's electrified service has already improved speeds and frequencies for Bay Area residents along the San Francisco Peninsula corridor, and the Transit 2050+ Network includes additional Caltrain frequency and capacity improvements that provide enhanced connectivity at all stations, including those that will be served by HSR. In the decades ahead, the Transit 2050+ Network identifies a suite of dual-purpose improvements to provide better access to HSR, including the Portal in downtown San Francisco, BART to Silicon Valley Phase II with connectivity to San Jose Diridon Station, and select grade separations along the Caltrain corridor to improve safety and performance.

Artist's rendition of the proposed redesign of San Jose's Diridon Station and plaza.

Artist's rendition of high-speed rail along the Caltrain corridor.

Key Benefits of the Transit 2050+ Network

The Transit 2050+ Network could significantly improve the Bay Area's transit network relative to today. This section provides a description of those anticipated improvements and how they may benefit transit riders. The Network Performance Assessment (see Chapter 7) provides an additional quantitative assessment of the potential benefits that the Transit 2050+ Network could provide. More information on specific projects can be found in Plan Bay Area 2050+ Transportation Project List in **Appendix 3**.

Improved Service Frequencies on All Modes

Five- to 10-minute frequencies throughout the Bay Area's most populous cities would help riders in the region's densest parts travel without needing to consult a schedule. These improvements come from projects like the Muni Forward Five-Minute Network, AC Transit Local service frequency improvements and the VTA Visionary Network, which would improve transit frequencies in and around the Bay Area's three largest cities.

Improved frequencies of 15 minutes or better between urban centers could make transit an attractive option for longer trips that are often driven on highways. Projects like the SamTrans Express Bus Expansion and Golden Gate Transit Express Bus Modernization provide these improvements to residents across four counties and connect Sonoma, Marin, San Mateo and San Francisco counties.

More frequent local service within suburban centers could enable more people to use transit for shorter, neighborhood trips and provide better first- and last-mile connections to regional transit. For example, County Connection's local service improvements boost frequencies within central Contra Costa County and would make connections to BART easier, while SolTrans and VINE local service frequency boosts enhance connections between Solano and Napa counties and to the ferry terminal in Vallejo.

More frequent midday and peak period service would allow more people to use transit for regional trips made throughout the day. For example, Caltrain's Enhanced Growth program doubles train frequencies in peak hours, while BART's Core Capacity improvements, as well as enhancements to SF Bay Ferry and Golden Gate ferry services, would increase the frequency of all-day transbay services.

Systemwide, improved transit service frequencies could provide transit riders with **shorter wait times, more choices and more freedom** to travel when and where they want. **Figure 6** and **Figure 7** show how the Transit 2050+ Network could improve transit frequencies during the PM peak period. **Figure 8** and **Figure 9** show how the Transit 2050+ Network could improve transit frequencies during the midday period. (Figures appear on the following pages.)

Figure 6. Conceptual overview of existing PM peak period transit frequencies on key links throughout the Bay Area's transit network.

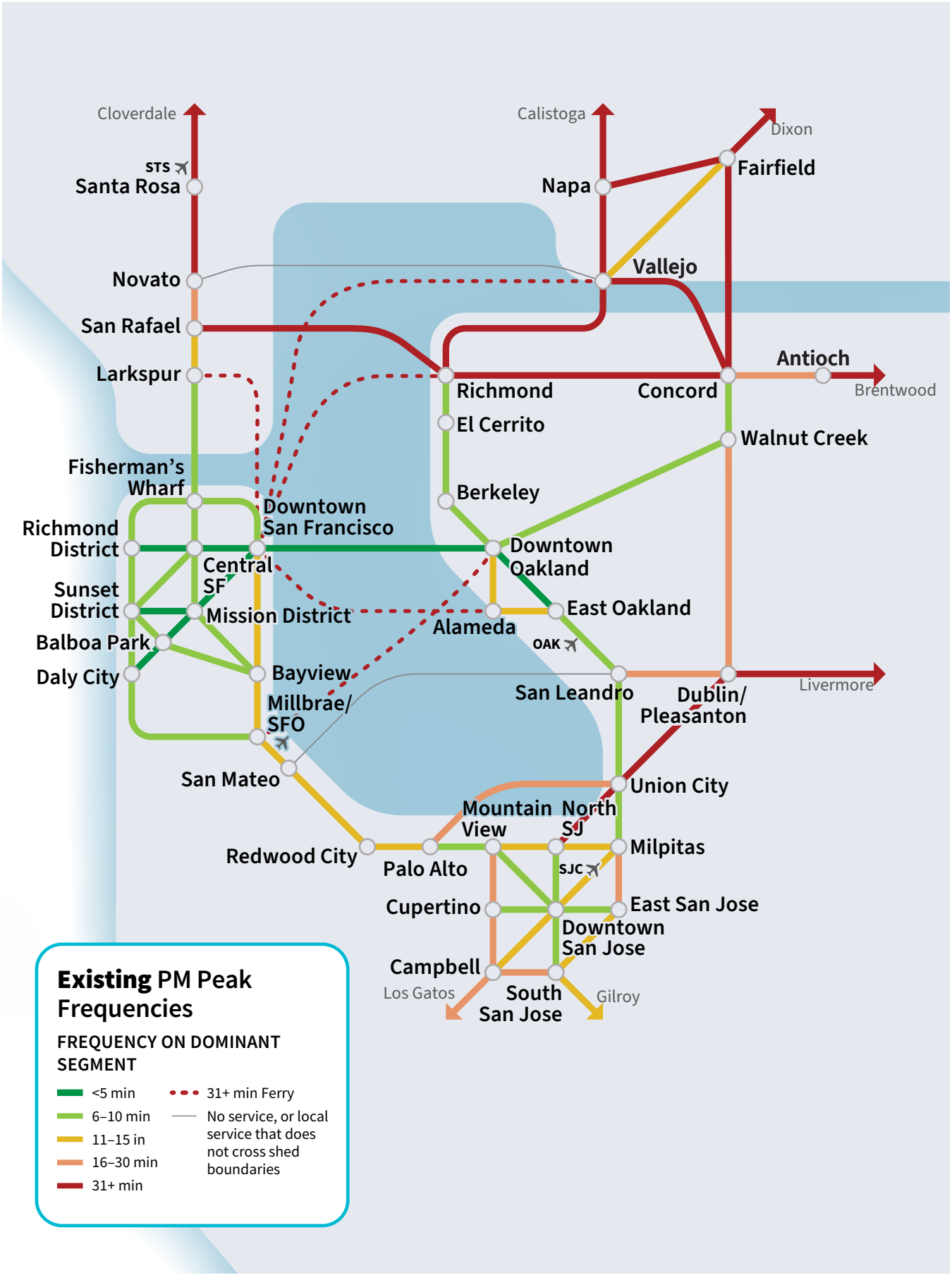


Figure 7. Frequency improvements resulting from implementation of the Transit 2050+ Network during the PM peak period.

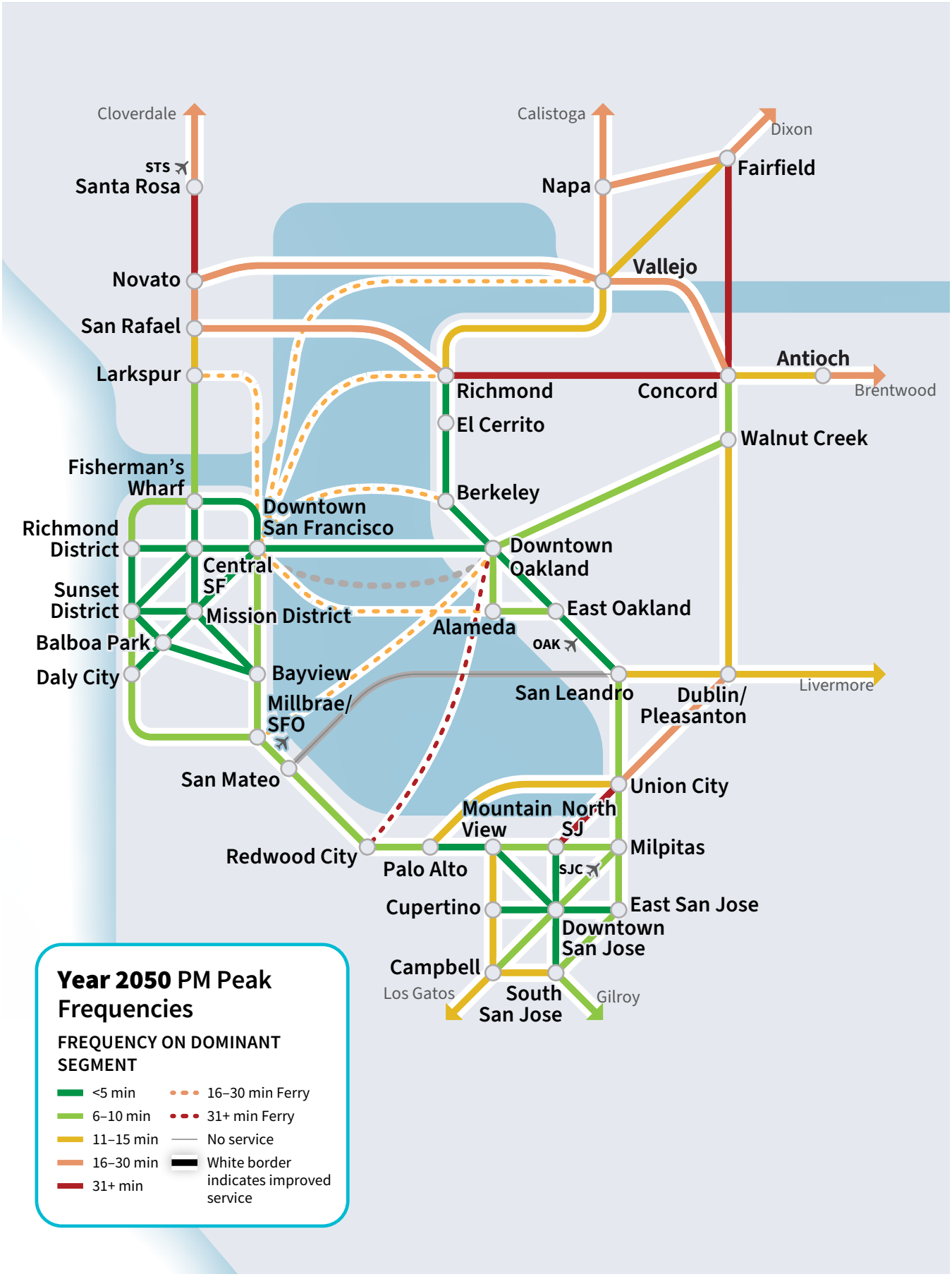


Figure 8. Conceptual overview of existing midday transit frequencies on key links throughout the Bay Area's transit network.

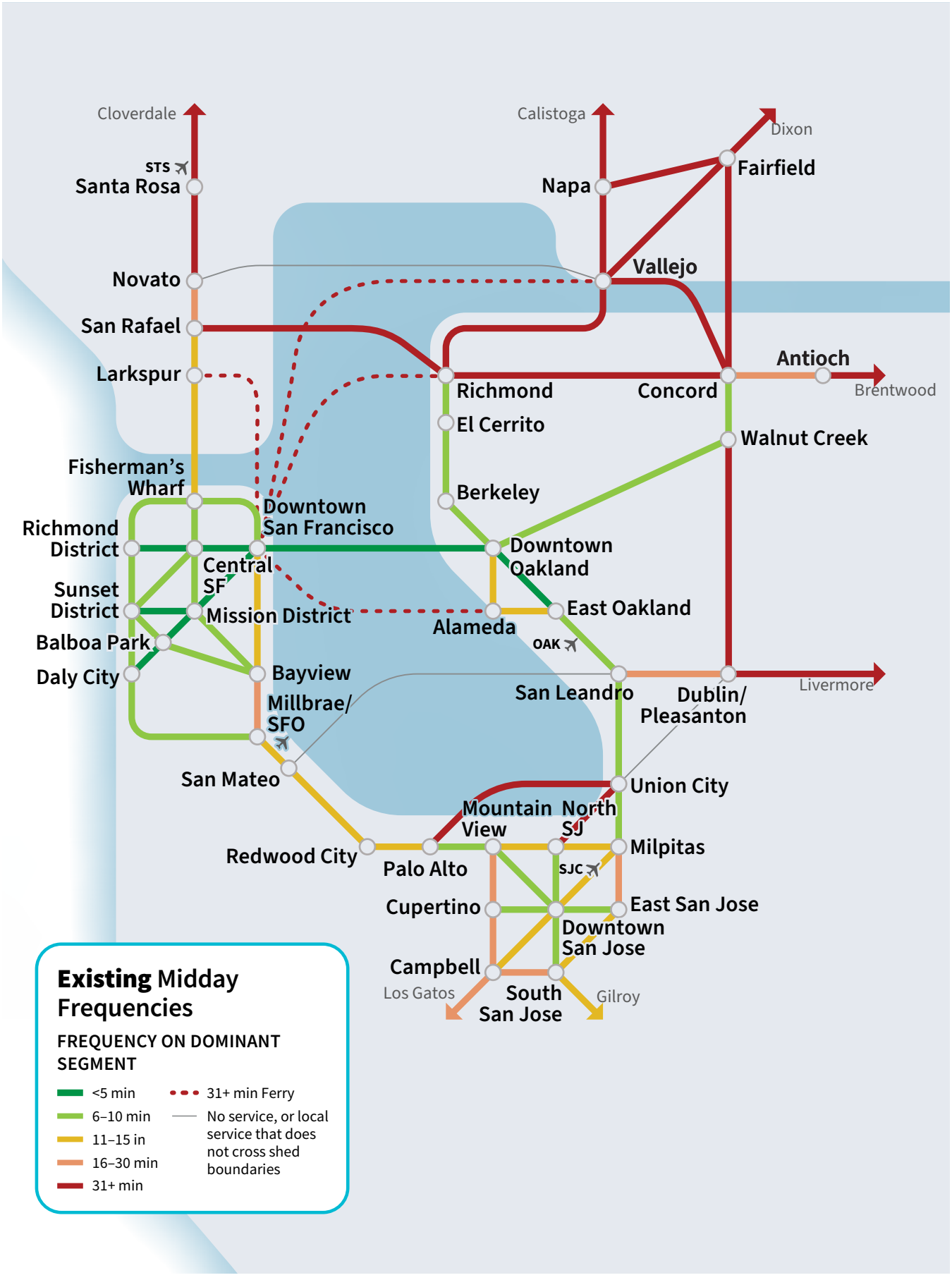
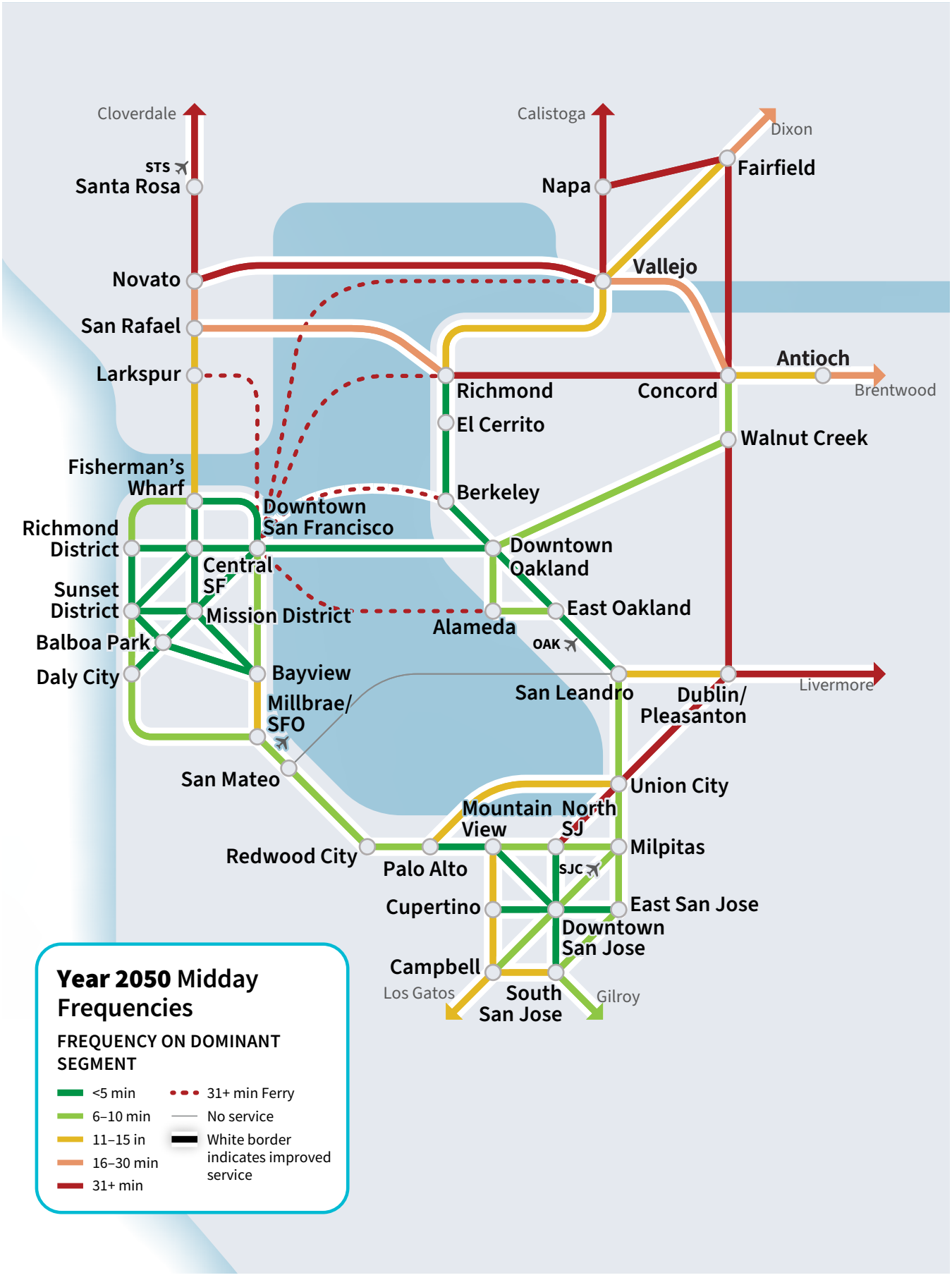


Figure 9. Frequency improvements resulting from implementation of the Transit 2050+ Network during the midday period.



Improved Transit Speed and Reliability

A focus on transit priority throughout the Bay Area would make transit trip times faster and more reliable with both corridor-level improvements and spot treatments in high-delay areas. New rapid bus and bus rapid transit (BRT) routes for AC Transit and Tri Delta Transit riders could improve the speed of transit service on key travel corridors in the East Bay and make it easier to connect to BART and other regional services. Improvements to light-rail infrastructure, including signaling and control systems, and implementation of transit priority infrastructure and traffic signal priority for trains and buses in San Francisco and San Jose would reduce delays and provide more reliable service. Transit priority improvements on El Camino Real would improve service reliability and speeds for SamTrans and VTA passengers throughout the Peninsula and South Bay. Express bus services on key freeway corridors in the North Bay and East Bay would benefit from new part-time transit lanes that enable buses to bypass traffic congestion during peak periods. **Figure 10** (on next page) and **Figure 11** (on page 52) show existing conditions and key links in the transit network that would benefit from transit priority improvements included in the Transit 2050+ Network.

Modernization projects at the system level would update the Bay Area's transit network with 21st century technology that would improve reliability and increase system capacity. These include train control systems upgrades and infrastructure improvements that would significantly improve capacity and reliability for BART trips through the Transbay Tube and enhance Muni Metro service within the Market Street Subway. Grade separations would improve the safety and reliability of rail operations while facilitating future high-speed rail service along the Caltrain corridor. New ferry terminals in Berkeley and Redwood City would expand transit options for those traveling across the San Francisco Bay. **Figure 12** and **Figure 13** (on pages 53 and 54) show existing conditions and the heavy rail and ferry connections that would benefit from implementation of the Transit 2050+ Network.

PHOTO: KARL NIELSEN

Figure 10. Existing bus rapid transit (BRT), rapid bus and light-rail transit (LRT) priority on key links in the Bay Area transit network.

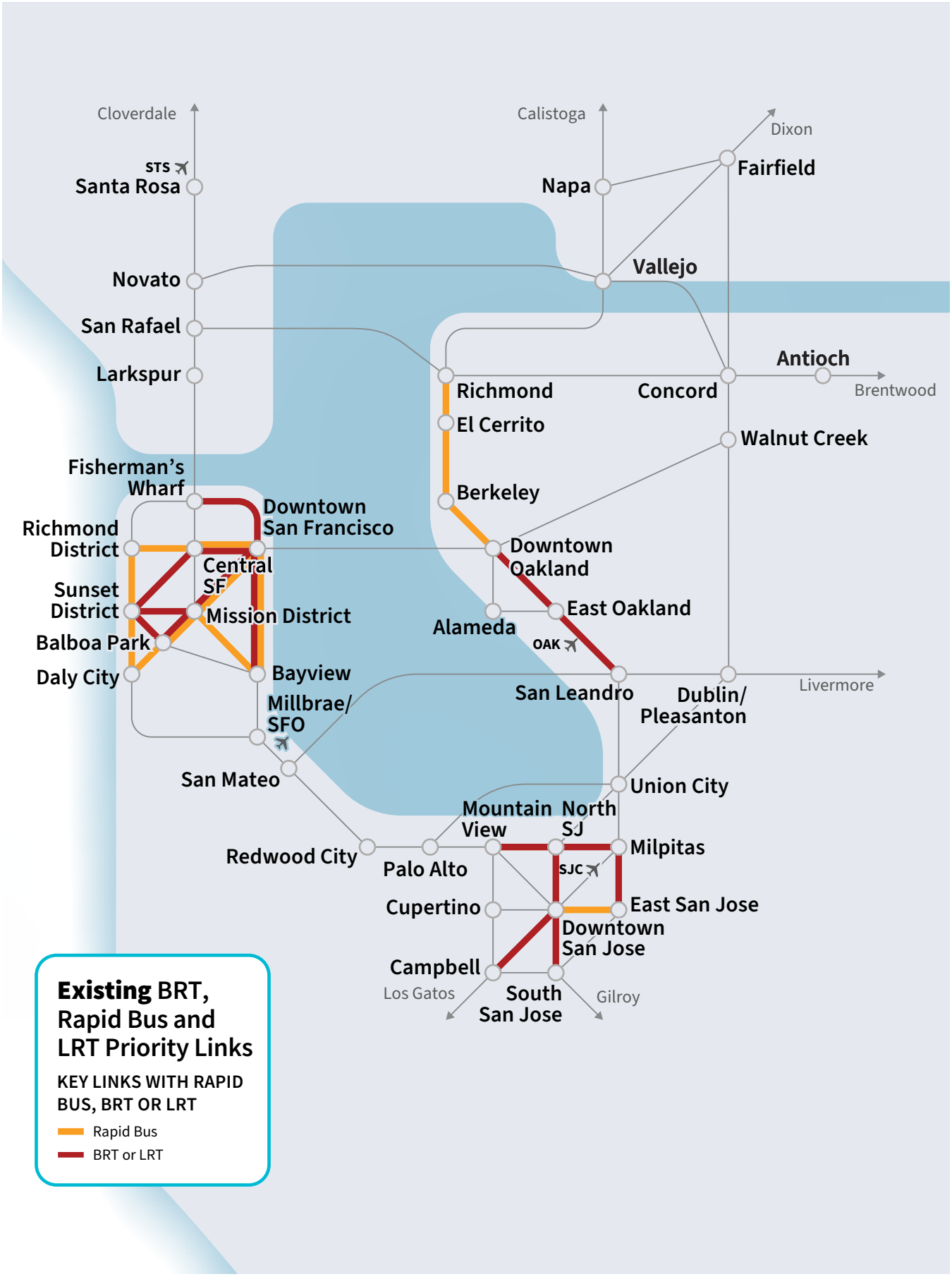


Figure 11. Planned bus rapid transit (BRT), rapid bus and light-rail transit (LRT) priority and service improvements included in the Transit 2050+ Network.

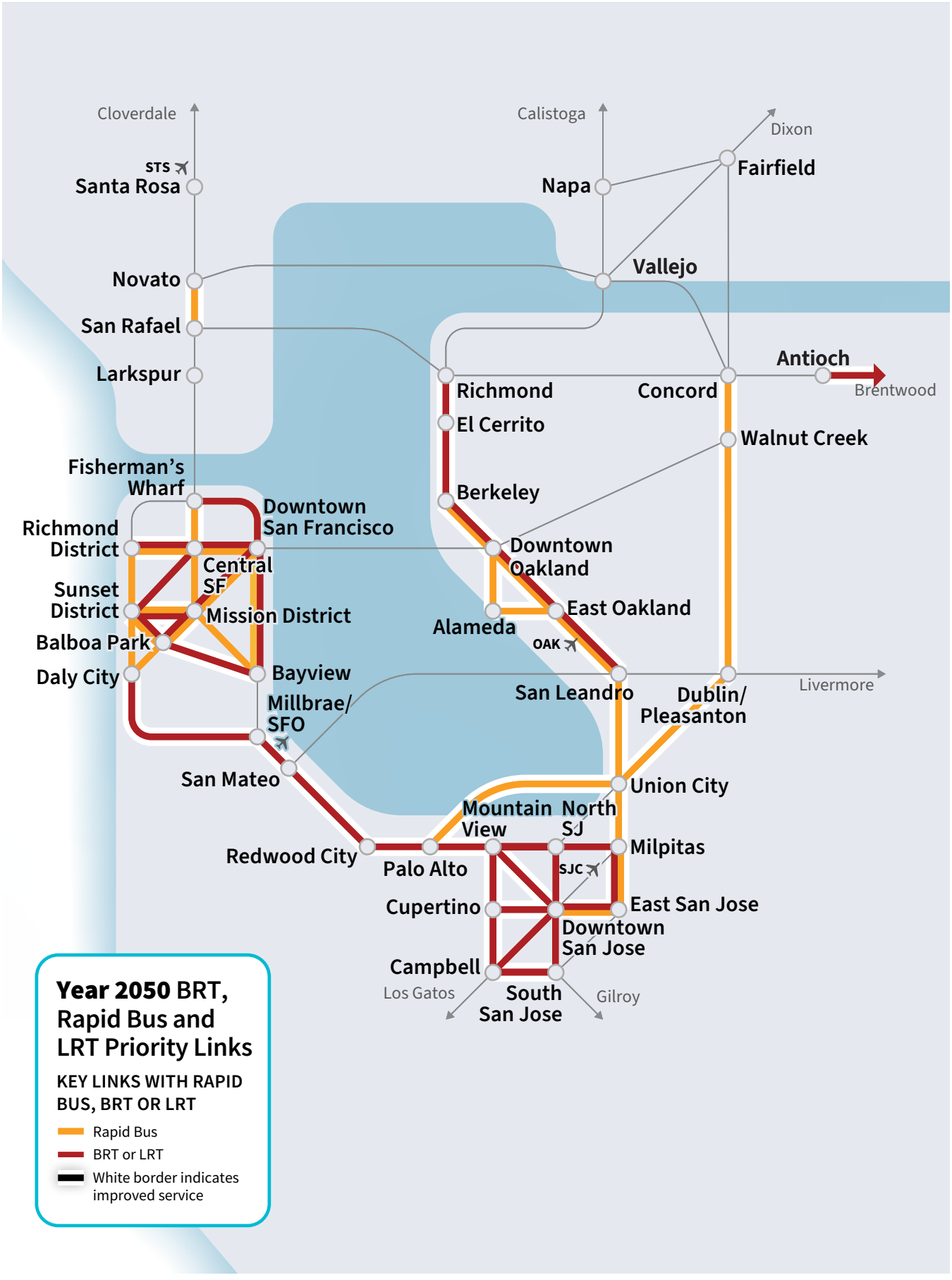


Figure 12. Existing heavy rail and ferry services on key links in the Bay Area transit network.

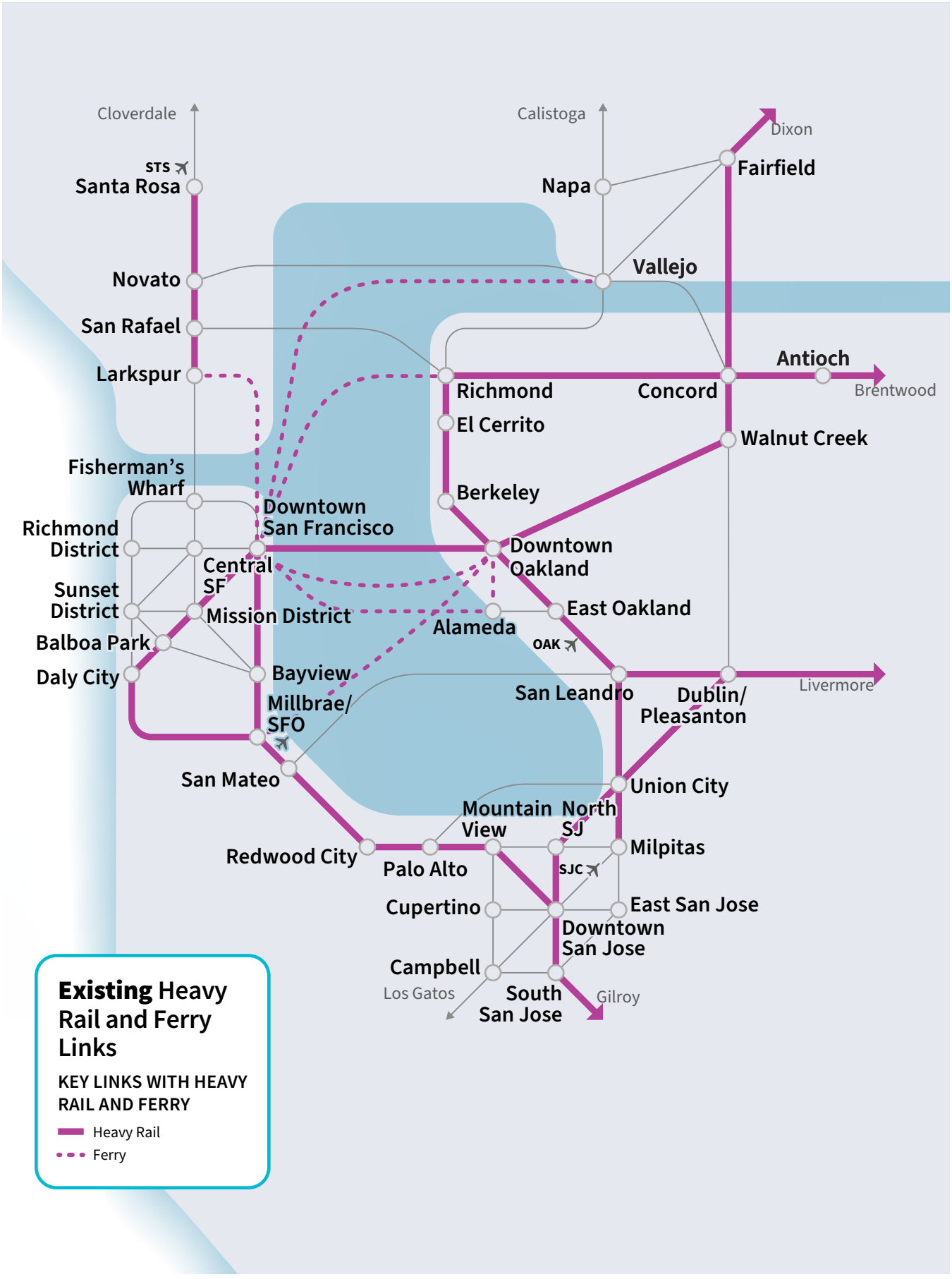
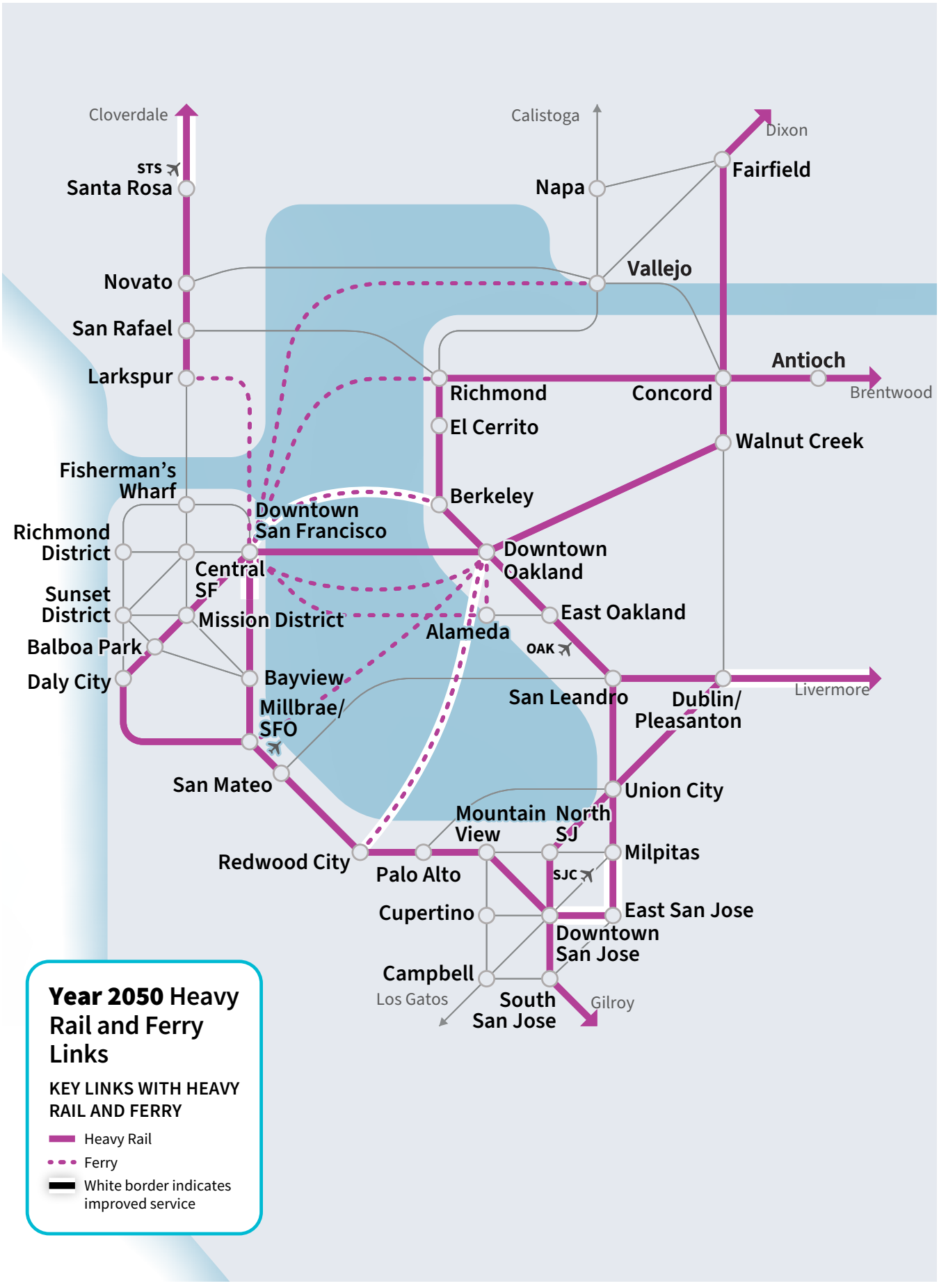


Figure 13. Planned heavy rail and ferry services included in the Transit 2050+ Network.



Improved Transfers and Regional Connectivity

Strategies T3, T11 and T12 could provide major improvements to overall transit connectivity through fast, seamless transfers at key transit hubs and transit frequency improvements throughout the transit network. Enhanced transit service coordination and improved hub infrastructure could make inter-agency transfers faster and more seamless for riders traveling across the Bay Area. Building on existing efforts like the Marin-Sonoma Coordinated Transit Study (MASCOTS) in the North Bay and regionwide coordinated service scheduling (e.g., the "Big Sync") among transit agencies could continue to improve transit travel times, reduce delays and long wait times at transfer points, and improve reliability for transit riders.

Moreover, planned service improvements across the transit network could enable more people to use transit for more of their trips. New east-west express bus service in the North Bay as part of the State Route 37 improvement project would fill a longstanding gap for residents in that part of the Bay Area. Extension of SMART to Cloverdale could provide new transit options in the U.S. 101 corridor through Marin and Sonoma counties. Improved transbay service to the Peninsula, including BART's extension to downtown San Jose and Santa Clara, the new Redwood City ferry terminal and improvements to Dumbarton Express bus service, including a new busway between Menlo Park and Redwood City, could support continued job growth and economic development in San Mateo County and elsewhere. Lastly, new interregional connections to San Joaquin County and the Sacramento Valley via Valley Link and enhancements to ACE and Capitol Corridor service could support intercity passenger rail travel within California. **Figure 14** (on page 57) provides a conceptual overview of which key links across the Bay Area's transit network would be served by the planned transit service and capital investments included in the Transit 2050+ Network.

PHOTO: JEREMY LIPPS/CALTRAIN

Improved Customer Experience

Improvements in safety, security and cleanliness respond to concerns expressed during multiple rounds of public engagement during the development of Transit 2050+ as well as multiple rounds of randomized polling conducted by MTC since 2020. Many people stated that improved lighting, stop and station amenities, additional staffing, and other safety and security enhancements could allow them to be more comfortable on transit and to take transit for more of their trips. Investments in safety and security improvements at stops, stations and on vehicles not only benefit existing transit riders but also encourage more people to use transit in the future.

Fare integration and standardized regional mapping and wayfinding could make it easier for customers to navigate and use the Bay Area's transit network, which often includes transfers between transit agencies, particularly for longer trips across county lines. Fare integration could also reduce the cost burden of multi-agency trips and allow customers to use the transit modes that provide them with the fastest, most direct service to their destinations instead of relying on more circuitous or slower local services because of the cost.

Improvements in paratransit and other accessible transportation services could significantly enhance access and mobility for people with disabilities and older adults. Investments included in Strategy T2 also could deliver operational efficiency enhancements for paratransit service providers that also will benefit their customers.

PHOTO COURTESY CALTRANS DISTRICT 4

Figure 14. Key links between Bay Area locations served by planned transit service and capital investments included in the Transit 2050+ Network through 2050.

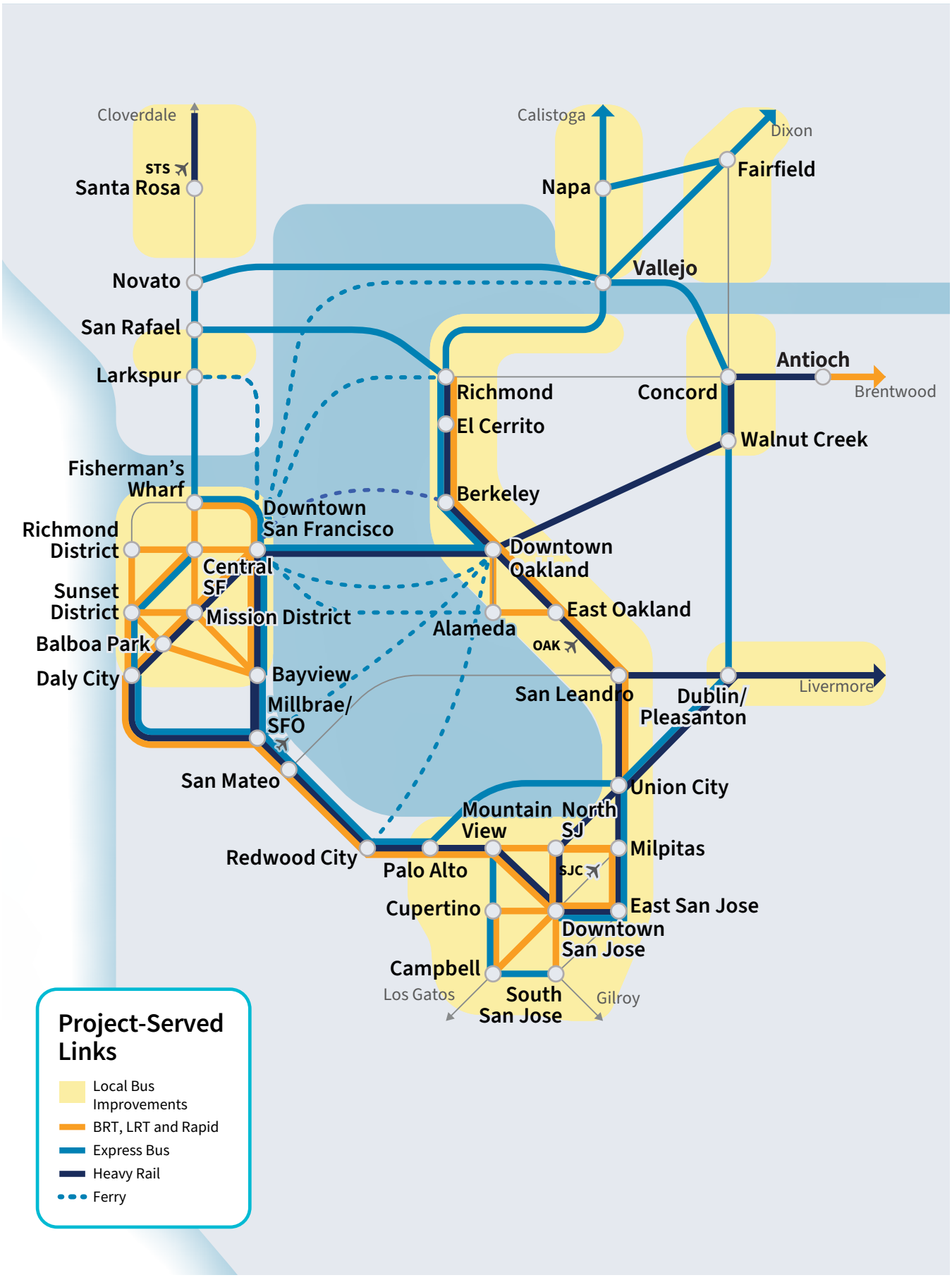


PHOTO: KARL NIELSEN

7. Transit 2050+ Network Performance Assessment

PHOTO: HANNAH DIAZ

The Network Performance Assessment seeks to understand how implementation of the Transit 2050+ Network may benefit the Bay Area. Using MTC's travel demand model, the assessment compares what might happen in the years 2035 and 2050 if the Final Plan Bay Area 2050+ is implemented *with* the Transit 2050+ Network and if the Final Plan is implemented *without* the Transit 2050+ Network (i.e., the current transit network remains unchanged from what it is today).

Network Performance Assessment Findings

The performance indicators presented in this chapter reflect the Transit 2050+ goals and are used to understand how implementation of the Transit 2050+ Network can help the Bay Area:

- Develop an integrated, well-connected transit network.
- Recover and grow transit ridership and increase the share of people using transit for their trips.
- Improve the reliability and average travel speed of transit service.
- Reduce barriers to using transit.

The assessment forecasted outcomes for both 2035 and 2050 to understand how the planned timing of transit investments — where lower cost, high-impact investments are implemented before 2035, and larger capital investments are implemented in the later years of the plan — could affect potential outcomes. **Appendix 4**[30] provides additional details on the assessment methodology and findings.

Increased Access to Jobs

By implementing the Transit 2050+ Network, the average household may be able to access 78,000 additional jobs within a 45-minute transit journey in 2035, marking a 20% increase relative to 2035 without implementation of the Transit 2050+ Network (see **Table 4**). Frequency improvements on core regional services like BART and Caltrain, five-minute or less frequencies in major urban centers that make transfers easier and faster, and transit priority treatments could unlock more job opportunities for Bay Area residents. Households in Equity Priority Communities, which can already access more jobs via transit than average households, may be able to access an additional 92,000 jobs in 2035.

Transit outcomes may improve even further by 2050, when the average household may be able to access 136,000 additional jobs as new connections such as BART to Silicon Valley Phase II, the Caltrain/High-Speed Rail Portal and Valley Link open for passenger service, further improving access to major job centers.

Table 4. Forecasted number of regionwide jobs that could be accessed within a 45-minute transit journey.

Households	2023	2035 Final Plan Without Transit 2050+	2035 Final Plan With Transit 2050+	Change With Transit 2050+	2050 Final Plan Without Transit 2050+	2050 Final Plan With Transit 2050+	Change With Transit 2050+
All Households	293,000	398,000	476,000	+78,000 jobs (+20%)	435,000	571,000	+136,000 jobs (+31%)
EPC Households	383,000	549,000	641,000	+92,000 jobs (+17%)	593,000	718,000	+125,000 jobs (+21%)
Zero-car Households	578,000	825,000	903,000	+78,000 jobs (+9%)	837,000	962,000	+125,000 jobs (+15%)
Car-Light Households	496,000	655,000	747,000	+92,000 jobs (+14%)	631,000	762,000	+131,000 jobs (+21%)

NOTE: *The forecasted total number of jobs in the region is 4.9 million in 2035 and 5.4 million in 2050.*

30 Appendices are available online at: https://planbayarea.org/finalplan.

Table 5. Forecasted average weekday transit trips[31] and transit mode share.[32]

Transit Trips & Mode Share	2023	2035 Final Plan Without Transit 2050+	2035 Final Plan With Transit 2050+	Change With Transit 2050+	2050 Final Plan Without Transit 2050+	2050 Final Plan With Transit 2050+	Change With Transit 2050+
Daily Transit Trips	907,000	1,558,000	2,165,000	+607,000 (+39%)	1,821,000	2,568,000	+747,000 (+41%)
Transit Commute Mode Share	9%	14%	19%	+5%	14%	20%	+6%
Transit Non-Commute Mode Share	5%	7%	7%	+<1%	7%	8%	+1%

Increased Transit Ridership

The Transit 2050+ Network could increase transit ridership in the Bay Area by 39% in 2035 and 41% in 2050, to a total of nearly 2.6 million daily riders in 2050 (see **Table 5**). In 2050, Bay Area residents are projected to take nearly 750,000 more transit trips while taking 660,000 fewer automobile trips each weekday as a result of Transit 2050+ implementation. New and expanded transit services could lead to more Bay Area residents and visitors taking transit, with most of the increase occurring by 2035 due to the implementation of high-impact strategies like local bus frequency boosts and transit priority treatments included for implementation by 2035. This is a significant increase over 2023, when regionwide daily transit ridership was approximately 900,000. With improved transit options, Bay Area residents are projected to take nearly 750,000 more transit trips each day while taking 660,000 fewer automobile trips each day.

Greater Transit Mode Share

The Transit 2050+ Network could increase the share of people who use transit to get to work due to enhanced and expanded transit services and improved access to jobs. By 2050, 1 in 5 Bay Area commuters could take transit to work, compared with just one out of every 11 in 2023 (see **Table 5**). The share of non-work trips made using transit, which historically have a much lower transit mode share, could increase from about 5% to about 8% by 2050. Non-work trips, which include trips for shopping, recreation, medical appointments and other errands, often do not occur on a regular schedule. Because people usually seek greater flexibility when making these types of trips, and because they can occur during "off-peak" times when there is less traffic congestion, a much higher proportion of these trips occur via private autos. Improvements in the frequency of midday transit service included in the Transit 2050+ Network would provide better transit options for non-work trips made during midday. Overall, these forecasted increases in the share of people using transit mean that more Bay Area workers could choose to get out of their cars and onto buses, trains and ferries if the Transit 2050+ Network is implemented.

31 These are daily linked transit trips. In other words, the number of complete trips from origin to destination, not counting transfers as their own trips.

32 Mode share refers to *tours* and not trips. A tour is a complete round trip, for example, to work and back home, including any intermediate stops that might be made along the way.

Table 6. Forecasted total and per capita passenger vehicle miles traveled (VMT).

VMT & Emissions	2023	2035 Final Plan Without Transit 2050+	2035 Final Plan With Transit 2050+	Change With Transit 2050+	2050 Final Plan Without Transit 2050+	2050 Final Plan With Transit 2050+	Change With Transit 2050+
Average Daily Passenger VMT	107 million	114 million	110 million	-4 million (-3.5%)	119 million	114 million	-5 million (-4.1%)
Average Daily Passenger VMT per Person	14.4	13.4	13.0	-0.4 miles (-3%)	12.4	11.9	-0.5 miles (-4%)
Modeled Daily CO_2 Emissions	61,800 tons	68,900 tons	67,000 tons	-1,900 tons (-3%)	79,500	76,700	-2,800 tons (-4%)

Reduced Vehicle Miles Traveled (VMT)

With more residents choosing transit due to Transit 2050+ investments, daily per capita VMT is forecasted to decrease by 3% in 2035, highlighting the improved mobility and environmental benefits of the Transit 2050+ Network (see **Table 6**). Lowering VMT can reduce congestion, pollution and emissions, which in turn supports a healthy and vibrant Bay Area. Since passenger vehicles like cars and trucks are the largest cause of transportation-related greenhouse gas emissions in the Bay Area, the Transit 2050+ Network's VMT reductions contribute to meeting the Bay Area's state-mandated 19% per capita greenhouse gas emissions reduction target for Plan Bay Area 2050+.

More Transit Priority Treatments

The Transit 2050+ Network includes a variety of transit priority treatments[33] that would speed up transit by bypassing traffic congestion, including dedicated transit lanes and transit signal priority at intersections. Implementation of the Transit 2050+ Network could increase the share of street-running bus and light-rail service miles with transit priority treatments from 9% in 2023 to 31% in 2035 and 40% in 2050, reducing interruptions that delay riders and impact the efficiency of transit operations.

33 More information about MTC's transit priority program is available on the MTC website: https://mtc.ca.gov/operations/transit-regional-network-management/transit-priority.

Faster Transit Travel Times

The Transit 2050+ Network speeds up transit services throughout the Bay Area, with improvements to evaluated corridors ranging from 2% to 19% during the AM peak period (see **Figure 15** and **Figure 16**). The assessment selected the following four city pairs to illustrate changes in travel time due to their overall transit trip density (i.e., high numbers of transit trips) and to understand the potential benefits of specific Transit 2050+ projects that serve them:

- Fremont/Union City – San Jose
- Mountain View/Palo Alto – San Jose
- Oakland – Richmond
- Oakland – San Francisco

Travel times between these cities improve due to projects such as BART Core Capacity, San Pablo BRT and Caltrain frequency boosts. Trips where the transit ride itself is a larger part of the overall trip may experience a much greater travel time reduction, while other trips with a longer walk or drive to access transit stops or stations may see lower reductions and therefore contribute to a seemingly low average. The one exception is San Jose – Fremont/Union City, where travel times may increase by 2035 due to increasing traffic congestion but then decrease by 2050, in large part due to the envisioned completion of BART's extension to downtown San Jose after 2035. Similar time savings to these AM peak period savings are expected in the midday and are included in **Appendix 4**. While transit travel times improve, competing with driving remains difficult under the Transit 2050+ Network, with only moderate improvements along many less congested corridors where driving is still fast and convenient. More information on auto competitiveness is included in **Appendix 4**.

Figure 15. Forecasted improvements in 2050 AM peak period (6-10 a.m.) transit travel times in the peak commute direction.

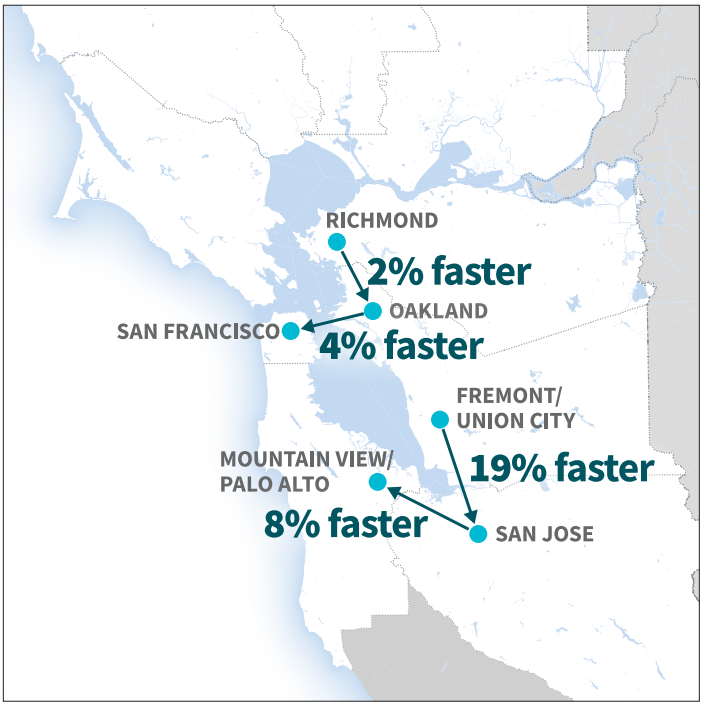
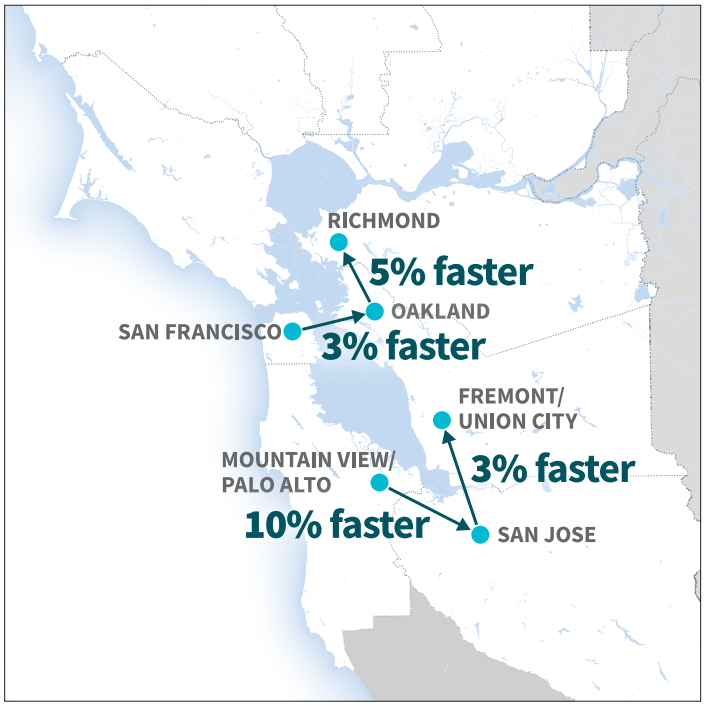


Figure 16. Forecasted improvements in 2050 AM peak period (6-10 a.m.) transit travel times in the reverse commute direction.



Fewer Barriers to Using Transit

Improving the customer experience is essential to maintaining transit's existing riders and attracting new ones. Enhancements included with the Transit 2050+ Network seek to reduce or eliminate a range of barriers.

- **Safety, security and cleanliness:** Strategy T4 includes investments to make transit vehicles and transit facilities cleaner, safer and more secure, including new transit ambassadors, security personnel, lighting improvements and security cameras. These investments address riders' and the public's major safety concerns to increase the transit ridership base.
- **Long and unpredictable wait times:** The Transit 2050+ Network increases transit frequencies across the system, including projects like Sonoma County local bus frequency boost and Caltrain Enhanced Growth. Additionally, transfer timing improvements from Strategy T3 reduce wait times at transfer stations.
- **Transit information and wayfinding:** The Transit 2050+ Network includes updated and regionally consistent mapping and wayfinding systemwide, design improvements at major hub and transfer stations that make it easier to find information, and new investments in transit information, like with Valley Link, that will have real-time information from opening.
- **Lack of universal design:** The Transit 2050+ Network includes universal maps and wayfinding materials, updated and accessible designs at transfer hub stations, and improvements to existing transit facilities to make them more accessible for all.

Overall, the Transit 2050+ Network, including transit service, capital projects, and other investments, would significantly increase the number and share of people who use transit to travel to work, school and other activities and help the Bay Area achieve its climate goals. These investments could also improve Bay Area residents' ability to access destinations throughout the region, particularly for those who may not have access to or are unable to drive a car. The Transit 2050+ Network's priority on implementing high-impact strategies before 2035 deliver meaningful improvements to Bay Area residents sooner by speeding up transit trips, increasing transit frequency and connectivity, and accelerating the region's transit recovery.

PHOTO: KENNETH KAO

8. Implementing the Transit 2050+ Network

PHOTO: NOAH BERGER

Transit 2050+ does not just delineate a new vision of how transit can evolve over the next 25 years to better meet the needs of Bay Area residents; it also identifies near-term commitments to turn that vision into reality. To implement the Transit 2050+ Network, MTC will need to work together with transit agencies and other federal, state and local agency partners and organizations.

This chapter outlines anticipated challenges to enacting the Transit 2050+ Network and identifies the partners that will be key to making the network a reality. The chapter then outlines the roles of MTC and partners for each of the six strategies, concluding with a set of specific actions over the next five years that are consistent with the Plan Bay Area 2050+ Implementation Plan.

Implementation Challenges

Coordinating transit service and capital improvements among the fragmented governance of the Bay Area's transit agencies and jurisdictions can be a challenge in and of itself, but the region has made substantial progress in improving coordination through implementation of the Bay Area Transit Transformation Action Plan (2021).

Implementing the Transit 2050+ Network will require concerted effort from MTC and its partners to address the following key challenges:

Inadequate and unreliable funding for transit operations and capital improvements. Plan Bay Area 2050+ and Transit 2050+ anticipate that additional new money will become available in the future, but MTC and its partners will need to continue efforts to ensure these revenues come to fruition as existing funding will not be sufficient to maintain and expand Bay Area transit. Sources could include a new sales tax measure as well as new user pricing mechanisms such as road user charges, congestion pricing zones, all-lane tolling and parking pricing.

Lengthy and unpredictable project delivery timelines and cost escalation. Funding, environmental review and permitting, especially across jurisdictions, can delay projects, escalate labor and materials costs, and make timely and cost-effective delivery of infrastructure projects especially difficult.

State requirements that may inadvertently increase the cost of transit operations and lead to service reductions. California's Innovative Clean Transit (ICT) zero-emission vehicle regulations, requiring all transit agencies to transition to a 100% zero-emission bus fleet by 2040, could hinder climate goals by diverting scarce resources away from transit frequency and reliability improvements. Implementing the ICT rule under the current timeline would come at the expense of high-impact investments in service and transit priority improvements that would more efficiently reduce emissions while also improving safety, mobility and access.

Meeting workforce needs for transit operators, mechanics and maintenance workers. Operator staffing shortages have made it difficult to provide reliable transit service and have led to service cancellations. Mechanics and maintenance workers, many of whom are reaching retirement age,[34] are vital for keeping transit vehicles and facilities in a state of good repair.

Inadequate provision of social support services. Transit agencies expend significant resources addressing the needs of people experiencing health crises but do not receive financial support for these services for their customers. These obligations consume agency funding for transit safety and make it difficult to maintain a safe, clean operating environment.

34 The American Public Transportation Association found that in 2021, 43% of the transit workforce was over the age of 55, compared to just 24% for all transportation sectors. Further information available at https://www.apta.com/wp-content/uploads/APTA-Transit-Workforce-Shortage-Report.pdf.

PHOTO: NOAH BERGER

Key Partners for Implementation

In addition to transit agencies and MTC, many other agencies and organizations also are important partners in implementing the Transit 2050+ Network:

State and federal agencies like the Federal Transit Administration, California State Transportation Agency and Caltrans provide funding and maintain state assets like highways. Partnership with funding agencies is crucial for the Bay Area to acquire the money needed to implement the Transit 2050+ Network and ensure shared infrastructure is maintained.

State and federal elected officials pass laws that affect the Bay Area's transit system. Continued partnership with legislators is necessary to ensure uninterrupted transit funding and provide MTC and other partners the authority to build, operate and maintain effective transit services and infrastructure.

Local agencies and jurisdictions like cities and county transportation agencies develop plans and fund projects within their jurisdiction. They can support coordination between smaller agencies and are often the sponsors for projects within the Transit 2050+ Network. Partnership with local agencies is important to implement improvements on local streets and in the communities we serve.

Social service providers are an integral part of the transportation network, especially for riders with disabilities who rely on paratransit or other specialized transportation. Social service providers also work with transit agencies to deliver services to unhoused riders.

Local stakeholders include community-based organizations, advocates, non-profits, labor organizations and business groups. These organizations provide local expertise, advocate for communities and represent economic interests across the Bay Area. Their support is critical to ensure that implementation of the Transit 2050+ Network meets the needs of residents, workers and visitors throughout the region.

MTC and Partner Roles in Implementing Transit 2050+ Strategies

MTC worked with transit agency staff and other stakeholders to identify near-term actions that would support the implementation of the Transit 2050+ Network's six strategies. These actions are intended to take place in the first five years after the plan is adopted.

Specific actions are organized by strategy in **Table 7** of the following section.

Securing Funding to Support All Transit Strategies

To prevent major transit service cuts and make improvements to transit affordability, accessibility and reliability, MTC and regional partners must ensure that the Bay Area's transit agencies have reliable sources of funding. In 2025, MTC worked with state legislators, local advocates and transit agencies to develop Senate Bill 63 (Wiener/Arreguín, 2025), which will allow voters in Alameda, Contra Costa, San Francisco, San Mateo and Santa Clara counties to consider a regional transportation sales tax in 2026 to sustain and improve transit. If passed by voters, MTC will allocate generated revenue according to the expenditure plan outlined in SB 63.

Additionally, MTC will continue to seek new partnerships and advocate for additional or more flexible federal and state funding to sustain and improve critical transit services. MTC will coordinate funding strategies for priority projects and work with partners to make operating transit service more efficient. Advocacy work could include reevaluating grant match requirements, expanding transit agencies' eligibility for social services funding and increasing flexibility for transit and active transportation funding.

Implementation Plan actions in **Table 7** pertaining to funding include Actions 1 and 3.

STRATEGY T1: Operate and Maintain the Existing System

The Bay Area's diverse transit network moves millions of residents and visitors every year and provides a vital engine for economic activity and personal mobility. SB 63 will enable residents in Alameda, Contra Costa, San Francisco, San Mateo and Santa Clara counties to consider a 14-year regional transportation sales tax to prevent major service cuts and improve transit affordability, accessibility and reliability. MTC is also seeking partnerships, funding flexibility and new state and federal funds to maintain and expand the Bay Area's transit network.

Meanwhile, MTC and partner agencies are working to maintain the existing transit system, improve its effectiveness and keep it affordable for all. MTC in May 2025 approved a resolution to make the Clipper START pilot program an ongoing fare product that offers a uniform 50% discount for lower-income adults age 19 to 64 for rides on all systems that accept Clipper. With the recent launch of Next Generation Clipper, MTC can explore additional ways to offer recurring discounts and affordability programs to the region's residents. MTC also is partnering with transit agencies and county agencies to improve the effectiveness of existing transit service where multiple agencies provide overlapping services, including efforts such as the Marin-Sonoma Coordinated Transit Service Plan (MASCOTS).

As much of the existing workforce nears retirement age, transit agencies and state partners are working to maintain a robust transit workforce, including vehicle operators, maintenance workers and other professionals, with support from MTC. Additionally, MTC is coordinating with state and local partners to advocate for modifications to implementation timelines for state Innovative Clean Transit requirements due to vehicle reliability and availability issues. Transit agencies are transitioning to zero-emissions fleets, but current mandates could force a reduction in transit services if not addressed appropriately.

Implementation Plan actions in **Table 6** pertaining to Strategy T1 include Actions 4, 7, 8 and 9.

STRATEGY T2: Improve the Rider Experience Through Transit Network Integration

The Bay Area Transit Transformation Action Plan (TAP) provides a roadmap for better integrating the Bay Area's transit services into a comprehensive regional network that can better serve transit customers' needs. MTC is working with the region's transit agencies on Regional Network Management initiatives to improve riders' experiences and make it easier and more affordable to get around the Bay Area. MTC plans to update the TAP in partnership with transit agencies, county transportation agencies, advocates and other local stakeholders to revise timelines, prioritize new actions and refine performance metrics.

MTC currently is partnering with transit agencies to test new mapping, wayfinding and customer information as part of the Regional Mapping and Wayfinding Project, with plans to expand regionwide. These new, easier-to-understand materials will provide a consistent and familiar experience to riders at thousands of transit stops and stations throughout the region. Transit agencies, cities and counties will continue to support maintenance of bus stops and transit stations in their jurisdictions, while MTC will support local agencies in implementing and updating transit signs and information.

Improvements to fare payments, including free and discounted interagency transfers and instant availability of added values, continue to roll out as the transition to Next Generation Clipper accelerates. These enhancements provide more fare options and seamless regional transit access for residents and visitors throughout the Bay Area. Next Generation Clipper can accommodate integrated fares for ADA paratransit services, making trips easier for riders with disabilities. MTC also will continue to advance actions prioritized in the 2021 Transit Fare Policy Vision Statement in partnership with transit agencies.

Other improvements to ADA paratransit service, including implementing recommendations from the Coordinated Public Transit-Human Services Transportation Plan, are included in Transit 2050+, including mobility management and travel training. Accessibility improvements for fixed-route services aim to help riders with disabilities use regular transit services, and MTC plans to support one-seat ride pilots where appropriate to improve the rider experience on paratransit services. MTC will work with the region's paratransit providers to develop a single regionwide eligibility system, booking and dispatching software and other operational improvements.

Implementation Plan actions in **Table 7** pertaining to Strategy T2 include Actions 10, 11, 12 and 13.

PHOTO: NOAH BERGER

STRATEGY T3: Improve the Rider Experience Through Refined Transfer Timing at Key Regional Hubs

Because the Bay Area's transit network is operated by more than two dozen independent agencies, riders often need to transfer between multiple agencies to complete their daily journeys. MTC is working with transit agencies to make these transfers more convenient, using the TAP as a guide for implementing these actions.

To improve existing high-volume transfers, transit agencies will build on recent collaborative efforts including the Big Sync and the TRANSFER Plan[35] to better coordinate schedules where their services overlap, allowing riders to efficiently move between services. Transit agencies and MTC will work together to identify transit hubs with significant transfer activity where schedule timing, service plans and capital infrastructure can be improved.

Transit agencies and county transportation agencies will lead coordinated subregional planning efforts with resources and support from MTC, including real-time performance monitoring tools and data analysis. Improvements to transit schedule coordination will prioritize transfer hubs and the quality of real-time rider information. MTC will use those tools to improve accountability, including monitoring and reporting requirements established in SB 125 and SB 63.

Implementation Plan actions in **Table 7** pertaining to Strategy T3 include Action 14.

STRATEGY T4: Enhance Security Measures and Improve Safety and Cleanliness on Transit

MTC is working with transit agencies and other partners to improve safety, security and cleanliness on transit. BART completed the installation of its Next Generation Fare Gates in summer 2025, which are improving safety at stations and on trains while also increasing revenue recovery for BART's operations. Other Transit 2050+ initiatives include expanding transit ambassador programs around the region to help passengers find their rides and deter antisocial behavior without a police presence. For situations when more serious intervention is necessary, Transit 2050+ also proposes new funding for transit security and police personnel where needed.

Transit agencies also will continue to find ways to improve transit safety, security and cleanliness; identify where improvements should be prioritized; and measure the effectiveness of strategies. Transit agencies, advocates and state agencies also will identify new and innovative funding sources to promote safety, security and cleanliness on transit, including funding to provide outreach and other services to unhoused individuals and those experiencing health crises on transit and an adopt-a-stop program to fund station cleanliness and maintenance. MTC will support these efforts through assistance with funding and coordination.

Implementation Plan actions in **Table 7** pertaining to Strategy T4 include Action 15.

35 The TRANSFER Plan is a joint effort between MTC and transit agencies to synchronize transfer times at major transit hubs throughout the Bay Area. The most recent Big Sync, when schedule changes take effect, was in August 2025. More information is available on MTC's website at https://mtc.ca.gov/news/bay-area-transits-latest-big-sync-improves-transfers-saving-riders-20-minutes-trip.

STRATEGY T11: Enhance Transit Frequency, Capacity and Reliability

MTC and transit agencies are working together to advance actions from the TAP that will enhance existing transit services and implement new services. In addition to working together to secure additional funding that will allow transit agencies to optimize and expand service, MTC and partner agencies also will continue advancing efforts to improve transit priority infrastructure and enforcement.

MTC will work with transit agencies and county transportation agencies to adopt the Bay Area Transit Priority Policy for Roadways. Transit agencies, county transportation agencies and local jurisdictions will use this policy to make improvements to local streets and arterial roadways that improve transit speed and reliability. MTC will also conduct a regional Transit Priority Roadway Assessment to identify where investments in transit priority improvements should be prioritized.[36] To promote regional knowledge sharing, MTC will establish technical assistance programs to train transit agency and local jurisdiction staff.

MTC will work with lawmakers and state partners to advocate for administrative changes that will increase transit reliability and efficiency, including automated enforcement for transit lane violations, streamlined design exceptions and cooperative processes for transit-supportive projects, and optimized HOV lane hours and occupancy requirements in corridors with transit service.

Implementation Plan actions in **Table 7** pertaining to Strategy T11 include Action 23.

STRATEGY T12: Expand Transit Services Throughout the Region

To deliver transit megaprojects, MTC and regional partners will work together to ensure effective project delivery and consistent funding. Building on earlier actions, MTC will partner with stakeholders, including project sponsors, to advocate that large regional rail projects with existing or earmarked FTA funding do not have those funds revoked or delayed by the current federal administration. Advocacy in conjunction with state agencies will be necessary to protect funding for California transit projects.

To improve project delivery and cost-effectiveness, transit agencies and project sponsors will continue to identify cost efficiencies while MTC will convene project sponsors, industry experts and other stakeholders to recommend actions that can accelerate megaproject delivery and mitigate risks. Using past experiences, market conditions and anticipated trends, participants can help ensure that project funding is spent responsibly.

MTC also will identify ways to improve project prioritization by updating the region's Major Project Advancement Policy[37] in conjunction with transit agencies, county transportation agencies and project sponsors. Enhancing megaproject development policies and refining the stage gate evaluation framework will help MTC and regional partners deliver major projects on time and on budget.

Implementation Plan actions in **Table 7** pertaining to Strategy T12 include Actions 24, 25 and 26.

36 The Bay Area Transit Priority Policy for Roadways and the Transit Priority Roadway Assessment are led by MTC's Regional Network Management team. More information can be found on MTC's website at https://mtc.ca.gov/operations/transit-regional-network-management/transit-priority.

37 The Major Project Advancement Policy was adopted via MTC Resolution No. 4537. More information can be found on MTC's website at https://mtc.ca.gov/digital-library/5032034-mtc-resolution-no-4537-revised.

Implementation Actions for Transit 2050+

Table 7 outlines specific actions for implementation of the Transit 2050+ Network over the next five years. These actions are a subset of actions identified in the Plan Bay Area 2050+ Implementation Plan Report. More details on each action, as well as other non-transit actions, can be found in that report. MTC staff will provide annual progress updates on actions to MTC and ABAG committees to promote transparency and accountability.

Table 7. Implementation Actions for Transit 2050+.

Plan Bay Area 2050+ Action Number	Implementation Action	Relevant Strategy
1	Prepare for a new regional transportation revenue measure for 2026 and beyond.	All
3	Identify and pursue other diverse funding sources to accelerate transportation system enhancements.	All
4	Expand and align affordability and equity programs across transit fare strategies.	T1
7	Improve effectiveness of existing transit service with low-cost and cost-neutral coordinated improvements between transit agencies.	T1
8	Collaborate with transit agencies and other partners, including the state, to attract and retain transit workers.	T1
9	Address challenges with the California Air Resources Board's Innovative Clean Transit (ICT) implementation timeline.	T1
10	Update the 2021 Transit Transformation Action Plan (TAP) and continue collaboration with transit operators and stakeholders to implement TAP initiatives.	T2
11	Collaborate with transit operators and other partners to transition the current Regional Mapping and Wayfinding pilot project into an ongoing program.	T2
12	Advance integration of regional fare programs through Clipper improvements and policy implementation.	T2
13	Streamline and improve paratransit services and fixed-route transit to enhance access and mobility for seniors and people with disabilities.	T2
14	Partner with transit operators to analyze existing transit transfers, implement key improvements at transit hubs, support subregional coordinated service planning and improve quality and accuracy of real-time rider information.	T3
15	Explore opportunities to align regional standards for transit safety, security and cleanliness.	T4
23	Advance regional transit priority policies, infrastructure and enforcement.	T11
24	Explore approaches to improve the efficiency and cost-effectiveness of transportation project delivery with partners.	T12
25	Update how MTC prioritizes and sequences large transportation capital projects following Plan Bay Area 2050+ adoption.	T12
26	Advocate for maintaining existing federal funding commitments to major rail investments in the region.	T12

9. Conclusion

PHOTO: NOAH BERGER

The Transit 2050+ Network has the potential to transform the way residents and visitors travel around the Bay Area. Its implementation would advance Plan Bay Area 2050+'s vision of creating a more affordable, connected, diverse, healthy and vibrant Bay Area for everyone by significantly reducing the need to rely on private automobiles for transportation.

Overall, the Transit 2050+ Network, including transit service, capital projects and other investments, would significantly increase the number and share of people who use transit to travel to work, school and other activities and help the Bay Area achieve its climate goals. These investments could also improve Bay Area residents' ability to access destinations throughout the region, particularly for those who may not have access to or are unable to drive a car. The Transit 2050+ Network's emphasis on implementing high-impact strategies before 2035 delivers meaningful improvements by speeding up transit trips, increasing transit frequency and connectivity, and accelerating the region's transit recovery.

Collectively, these improvements have the potential to increase transit ridership in the Bay Area by 36% in 2035 and 41% in 2050, to a total of 2.6 million average weekday riders in 2050. Implementing the Transit 2050+ Network would help ensure that the Bay Area can meet its state-mandated climate goals, reducing vehicles miles traveled and decreasing per-capita greenhouse gas emission by 4% in 2050. With improved transit options, each weekday Bay Area residents are projected to take nearly 750,000 more transit trips while taking 660,000 fewer automobile trips. And the Transit 2050+ Network would increase access to jobs for the average household by 31% and improve access to more destinations via transit throughout the Bay Area, especially for those living in Equity Priority Communities.

However, the Bay Area faces unprecedented challenges in implementing the Transit 2050+ Network. The region's largest transit agencies have not recovered from the loss of ridership and revenue caused by the COVID-19 pandemic, and they face major funding shortfalls that threaten their ability to provide existing transit services, let alone improve or expand service. Many of the challenges that existed before the pandemic, such as inadequate funding for transit operations and slow travel and wait times, remain as well.

MTC and its local, regional and state partners are working to address these challenges by identifying and securing funding for transit service and rider improvements. This year, MTC and its partners advocated and secured enabling legislation (Senate Bill 63) for a regional transportation funding measure on the November 2026 ballot that if passed by voters in five Bay Area counties, would provide the resources necessary to sustain transit service and make progress on key rider-focused improvements essential for implementation of the Transit 2050+ Network. Likewise, implementation of the Bay Area Transit Transformation Action Plan since its completion in 2021 has resulted in unprecedented cooperation and coordination that has advanced efforts on fare coordination, regional mapping and wayfinding, and transit priority improvements.

The Bay Area will need additional money for both transit capital projects and operations to realize its vision of a faster, more frequent, better connected transit network that serves people of all ages and abilities. At the regional and local levels, new revenues from parking, roadway and congestion pricing will be instrumental in funding the improvements outlined in the Transit 2050+ Network after 2035. Ongoing support from the state and federal governments is needed in both the near and the long term, and the Bay Area will need to advocate for this support with one voice, clearly making the case for why transit is an integral part of creating a vibrant and healthy region, state and nation.

Lastly, partnership is needed not only to fund implementation of the Transit 2050+ Network but to continue enacting necessary reforms and changes that will result in cost-effective delivery of transit projects and service. Local and state governments, who own and operate the rights-of-way on which buses and light-rail travel, play a key role in ensuring that transit can operate efficiently and safely on roadways and that stops and stations are comfortable and easily accessible. Local communities can help grow transit ridership by supporting land uses and urban design that makes it easy, safe and comfortable to choose transit for more types of trips.

It is time to double down and build on the successful partnerships forged through the adversity of the COVID-19 pandemic, both now and for the long term. The Transit 2050+ Network provides an attainable vision for the Bay Area's transit network over the next 25 years, but it will require MTC, transit agencies, all levels of government, partner organizations and the public to prioritize resources and make the changes necessary to advance its implementation.

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File #: 26-0374, **Version:** 1

Subject:
MTC Resolution No. 4753. State Route 37 Designated Sub-Recipient Agreement for Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) Funds.

Presenter:
Kevin Chen

Recommended Action:
Commission Approval

Metropolitan Transportation Commission
Administration

March 11, 2026 **Agenda Item 2b-26-0219**

MTC Resolution No. 4753: State Route 37 Designated Sub-Recipient Agreement for Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) Funds

Subject:

A request that the Committee approve referral of MTC Resolution No. 4753 to the Metropolitan Transportation Commission (MTC), which authorizes MTC to enter into a Designated Sub-Recipient Agreement (DSA) with Caltrans designating MTC as a sub-recipient of the $20 million Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) funds for the State Route 37 Sears Point to Mare Island Improvement Project, and to submit a letter to Caltrans requesting Caltrans to proceed with the execution of a Recipient Agreement (RA) with the Federal Highway Administration (FHWA) prior to DSA finalization.

Background:

The Resilient SR 37 Program is planning a State Route (SR) 37 that is resilient to sea level rise and flooding, addresses chronic traffic congestion through innovative measures such as transit and high-occupancy vehicle prioritization, expands public access, and enhances ecological connections and facilitates restoration. The initial focus of the program is to deliver the SR 37 Sears Point to Mare Island Improvement Project (Project). The Project will provide new high occupancy vehicle lanes to support transit service along the corridor, improve traffic flow and peak travel times, increase vehicle occupancy, improve safety and public access, preserve and protect surrounding ecosystems, and improve corridor resilience against flooding in the near term. The Metropolitan Transportation Commission (MTC) and Caltrans are working as an integrated team for the delivery of the Project.

In August 2023, in response to FHWA Notice of Funding Opportunity for PROTECT funds, MTC submitted a request for $20 million for the delivery of the SR 37 Sears Point to Mare Island Improvement Project. In April 2024, FHWA announced that MTC was awarded $20 million dollars for the Project. This grant will go towards the delivery of the first construction package of the Project, which will involve primarily the replacement of Tolay Creek Bridge and operational improvements near Sears Point. The construction phase of the project will be led by Caltrans, and is anticipated to start in late 2026.

Since the award notice, staff has been working with Caltrans and FHWA staff on completing two separate agreements. The first one is a DSA between MTC and Caltrans designating MTC as a sub-recipient of the PROTECT funds, as MTC was the original grant applicant. The second is the grant RA between Caltrans and the FHWA. Processing this Project through Caltrans is beneficial since it allows MTC to work through Caltrans Local Assistance and their process, which is used for the majority of FHWA funding that MTC receives and that staff is familiar with, therefore, reducing the time and costs necessary to administrate this Project. Caltrans has asked for a letter from MTC

requesting Caltrans to proceed with the execution of a RA with FHWA prior to DSA finalization which will permit the RA between Caltrans and the FHWA to be executed as soon as possible, so that funding can be obligated in time for construction, even though Caltrans will require additional time to finalize the DSA.

Issues:
None identified.

Recommendations:
Staff recommends the Administration Committee to refer MTC Resolution No. 4753 to the Commission for approval, which authorizes MTC to enter into a DSA with Caltrans designating MTC as a sub-recipient of the $20 million PROTECT funds for the State Route 37 Sears Point to Mare Island Improvement Project, and to submit a letter to Caltrans requesting Caltrans to proceed with the execution of a RA with FHWA prior to DSA finalization.

Attachments:
- MTC Resolution No. 4753

Andrew B. Fremier

Date: March 25, 2026
W.I.: 2664
Referred by: Administration Committee

ABSTRACT

Resolution No. 4753

This resolution authorizes the Metropolitan Transportation Commission to enter into an agreement with Caltrans designating MTC as a sub-recipient of the $20 million Promoting Resilience Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) funds for the State Route 37 Sears Point to Mare Island Improvement Project.

Further discussion of this subject is contained in the Administration Committee Memorandum dated March 11, 2026.

Date: March 25, 2026
W.I.: 2664
Referred by: Administration Committee

Re: State Route 37 Designated Sub-Recipient Agreement for PROTECT Funds

METROPOLITAN TRANSPORTATION COMMISSION

RESOLUTION NO. 4753

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Section 66500 et seq.; and

WHEREAS, MTC is the designated Metropolitan Planning Organization (MPO) for the nine-county San Francisco Bay Area region; and

WHEREAS, the Resilient SR 37 Program is planning a State Route (SR) 37 that is resilient to sea level rise and flooding, addresses chronic traffic congestion through innovative measures such as transit and high-occupancy vehicle prioritization, expands public access, and enhances ecological connections and facilitates restoration. The initial focus of the program is to deliver the SR 37 Sears Point to Mare Island Improvement Project; and

WHEREAS, in April, 2024, the Federal Highway Administration (FHWA) announced that MTC was awarded $20 million dollars from a Promoting Resilient Operations for Transformative, Efficient, and Cost-Saving Transportation Program (PROTECT) grant for State Route 37 Sears Point to Mare Island Improvement Project; and

WHEREAS, the purpose of this grant will be for the delivery of construction package 1 of the Sears Point to Mare Island Improvement Project; and

WHEREAS, MTC is working with the California Department of Transportation (Caltrans) and FHWA staff on completing two separate agreements; and

WHEREAS, the first agreement is a Designated Sub-Recipient Agreement (DSA) between MTC and Caltrans, and the second a Recipient Agreement (RA) will be between Caltrans and the FHWA; and

WHEREAS, MTC believes there are benefits to using Caltrans Local Assistance process because it will reduce time and costs for administrative work; now therefore it be

RESOLVED, that the MTC Executive Director or his/her designee is authorized to negotiate and enter into a DSA with Caltrans, and to submit a letter to Caltrans requesting Caltrans to proceed with the execution of a RA prior to DSA finalization.

METROPOLITAN TRANSPORTATION COMMISSION

_____

Sue Noack, Chair

The above resolution was entered into by
the Metropolitan Transportation Commission
at a regular meeting of the Commission held
in San Francisco, California and at other
remote locations on March 25, 2026.

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0376, **Version:** 1

Subject:
MTC Resolution No. 3664, Revised. Allocation of $2.3 million in Regional Measure 2 (RM2) capital funds to Livermore Amador Valley Transit Authority (LAVTA) for Transit Signal Priority (TSP) Upgrade and Expansion Project.

Presenter:
Anne Meeple

Recommended Action:
Commission Approval

Metropolitan Transportation Commission
Programming and Allocations Committee

March 11, 2026 **Agenda Item 2b-26-0221**

MTC Resolution No. 3664, Revised. Allocation of $2.3 million in Regional Measure 2 (RM2) capital funds to Livermore Amador Valley Transit Authority (LAVTA) for Transit Signal Priority (TSP) Upgrade and Expansion Project

Subject:

Recommended allocation of $2.3 million in RM2 capital funds to LAVTA for the construction phase for RM2 Project #32.6, LAVTA TSP Upgrade and Expansion Project.

Background:

LAVTA Transit Signal Priority (TSP) Upgrade and Expansion

The $65 million I-580 Tri-Valley Rapid Corridor Improvements project, identified as capital project number 32 under RM2, and with the Alameda County Transportation Commission (Alameda CTC) as the project sponsor, includes subproject #32.6, the LAVTA TSP Upgrade and Expansion Project.

As sponsor for RM2 Project 32, Alameda CTC designated LAVTA as the implementing agency, and authorized LAVTA to submit allocation requests, for approximately $2.7 million in RM2 funds for the TSP Upgrade and Expansion project at its Commission meeting on May 23, 2024. MTC allocated $388,000 of these funds for design of the projects in June 2024.

LAVTA identified a need to replace the existing TSP system utilized by its 10R and 30R rapid routes, which uses obsolete technology that is no longer supported by the manufacturer, with a modern, cloud-based system. The TSP system is necessary to help LAVTA's rapid buses meet on-time performance goals. Due to aging TSP technology, LAVTA's buses have been falling short of these goals. To improve and maximize reliable travel times, LAVTA will upgrade their existing system to a cloud-based TSP system and expand the functionality to their entire bus fleet.

The RM2-funded design phase for this project was recently completed. LAVTA is preparing construction bid documents and expects to be ready to issue an invitation for bid shortly after the RM2 allocation is approved. LAVTA expects to purchase the TSP solution using a cooperative purchasing agreement with another public transit agency as early as April 2026.

Staff propose allocating the remaining $2.3 million in RM2 capital funds to the implementation phase of the LAVTA TSP Upgrade and Expansion Project, including up to six years of cloud-based TSP service fees as part of initial start-up costs.

Issues:

None identified.

Recommendations:

Refer MTC Resolution No. 3664, Revised, to the Commission for Approval

Attachments:

- MTC Resolution No. 3664, Revised
    - Attachments A6-D6

Andrew B. Fremier

Date: October 27, 2004
W.I.: 1255
Referred by: PAC
Revised: 03/23/05-DA 07/26/06-C
04/25/07-C 09/28/07-DA
12/19/07-DA 04/23/08-C
08/27/08-DA 09/24/08-C
11/26/08-C 01/28/09-DA
09/23/09-DA 02/24/10-C
07/28/10-C 11/16/11-DA
02/22/12-DA 03/28/12-DA
06/27/12-DA 10/24/12-C
10/23/13-C 07/24/19-C
05/26/21-C 10/27/21-C
06/26/24-C 03/25/26-C

ABSTRACT

Resolution No. 3664, Revised

This resolution approves the allocation of Regional Measure 2 funds for the I-580 Tri-Valley Rapid Corridor Improvements project sponsored and implemented by the Alameda County Congestion Management Agency.

This resolution includes the following attachments:

Attachment A - Allocation Summary Sheet
Attachment B - Project Specific Conditions for Allocation Approval
Attachment C - MTC staff's review of the Alameda County Congestion Management Agency's Initial Project Report (IPR) for this project
Attachment D - RM2 Deliverable/Useable Segment Cash Flow Plan

This resolution was revised through Executive Director Delegated Authority on March 23, 2005 to give ACCMA the flexibility to invoice MTC as frequently as monthly for expenses incurred on this project.

This resolution was revised through Commission action on July 26, 2006 to include additional allocations for Project 32.1, Eastbound I-580 Improvements for $11.5 million in new RM2 allocations, and Project 32.2, I-580/I-680 Interchange Modifications and Westbound I-580 Improvements for $1.7 million in new RM2 allocations.

This resolution was revised through Commission action on April 25, 2007 to include supplemental allocations for Project 32.1, Eastbound I-580 Improvements for $3.8 million in new RM2 allocations, and for Project 32.2, Westbound I-580 Improvements for $10 million in new RM2 allocations.

This resolution was revised through Delegated Authority on September 28, 2007 to provide a $500,000 supplemental preliminary engineering allocation for Project 32.1, Eastbound I-580 Improvements.

This resolution was revised through Delegated Authority on December 19, 2007 to allocate $500,000 in final design funds for Project 32.1, Eastbound I-580 HOV Improvements.

This resolution was revised through Commission Action on April 23, 2008 to allocate $9.182 million in construction funds for Project 32.1, Eastbound I-580 HOV Improvements, in order to backfill TCRP funds, and to add a condition that any TCRP repayments for this amount shall be returned to MTC. This action also rescinds $800,000 from an allocation for Environmental and reallocates the same amount for environmental under Project 32.2.

This resolution was revised through Delegated Authority on August 27, 2008 to allocate $100,000 in environmental and preliminary engineering funds for Project 32.1, Eastbound I-580 HOV Improvements, for High-Occupancy Toll accommodation on the corridor.

This resolution was revised through Commission Action on September 24, 2008 to allocate $400,000 in environmental phase funds for Project 32.1, Eastbound I-580 HOV Improvements, for corridor management activities, and $900,000 in environmental and preliminary engineering funds for Project 32.1, Eastbound I-580 HOV Improvements, for High-Occupancy Toll accommodation on the corridor.

This resolution was revised through Commission Action on November 26, 2008 to allocate $500,000 in environmental and preliminary engineering funds for Project 32.1, Eastbound I-580 HOV Improvements, for High-Occupancy Toll accommodation on the corridor.

This resolution was revised through Delegated Authority on January 28, 2009 to allocate $700,000 in environmental and preliminary engineering funds for Project 32.1, Eastbound I-580 HOV Improvements, for the supplemental auxiliary lanes on I-580.

This resolution was revised through Delegated Authority on September 23, 2009 to rescind allocation of $6,000,000 from the construction of Project 32.1d, Eastbound I-580 HOV Improvements, and to allocate $200,000 in environmental and preliminary engineering funds for Project 32.2, Westbound I-580 HOV Improvements.

This resolution was revised through Commission Action on February 24, 2010 to allocate approximately $1.7 million for the final design phase and $2.6 million for the right of way phase for Project 32.2a, I-580 Westbound HOV Lane Improvements, and allocate $300,000 for the environmental and preliminary engineering phase for Project 32.1d, I-580 Eastbound HOV Lane Improvements (Auxiliary Lanes).

This resolution was revised through Commission Action on July 28, 2010 to allocate about $1.3 million for the environmental mitigation of the I-580 HOV corridor (Project 32.1e).

This resolution was revised through Delegated Authority on November 16, 2011 to rescind $846,246.81 from the construction allocation of Project 32.1d, I-580 Eastbound HOV Lane Improvements (allocation number 08366416), due to payback from Traffic Congestion Relief Program reimbursement from the State of California.

This resolution was revised through Delegated Authority on February 22, 2012 to allocate $800,000 for the final design and $200,000 for right-of-way for Project 32.1d, I-580 Eastbound HOV Lane Improvements.

This resolution was revised through Delegated Authority on March 28, 2012 to allocate $200,000 in RM2 funds for the final design phase of Project 32.1d, I-580 Eastbound HOV Lane Improvements.

This resolution was revised through Delegated Authority on June 27, 2012 to allocate $585,000 in RM2 funds for the environmental phase of Project 32.1e, I-580 HOV Corridor Environmental Mitigation.
This resolution was revised through Commission Action on October 24, 2012 to allocate $335,279 for the final design phase and $3,315,000 for the construction phase of Project 32.1d, I-580 Eastbound HOV Lane Improvements (Auxiliary Lanes).

This resolution was revised through Commission Action on October 23, 2013 to rescind allocation of $1.5 million of previously allocated RM2 funds from Projects 32.1 and 32.2 due to cost savings at project close out, and to allocate $4 million in RM2 funds for the construction phase of Project 32.1f, I-580 HOV Improvements for High-Occupancy Toll accommodation on the corridor.

This resolution was revised through Commission Action on July 24, 2019 to allocate $7 million in RM2 funds for the construction phase of project 32.3, Dublin Transit Center Parking Garage Project.

This resolution was revised through Commission Action on May 26, 2021 to add a new project 32.4, LAVTA Rapid Bus Stop Improvement Project, and to allocate $230,000 in RM2 funds for design of this project.

This resolution was revised through Commission Action on October 27, 2021 to add a new project 32.5, LAVTA Shared Autonomous Vehicle Project, and to allocate $150,000 in RM2 funds for design of this project.

This resolution was revised through Commission Action on June 26, 2024 to rescind $150,000 in RM2 funds from the design phase of project 32.5, LAVTA Shared Autonomous Vehicle Project, add a new project, 32.6, LAVTA Transit Signal Priority Upgrade and Expansion, and to allocate $388,000 in RM2 funds for design of this project.

This resolution was revised through Commission Action on March 25, 2026 to allocate $2,306,970 in RM2 funds for construction of project 32.6 - LAVTA Transit Signal Priority Upgrade and Expansion (Attachments A-6 through D-6).

Additional discussion of this allocation is contained in the Executive Director’s memorandum to the MTC Programming and Allocations Committee dated October 8, 2004, July 12, 2006, April 11, 2007, and December 10, 2008, and the summary sheet to the Programming and Allocations Committee dated April 9, 2008, July 9, 2008, September 10, 2008, November 12, 2008, February 10, 2010, July 14, 2010, October 10, 2012, October 9, 2013, July 10, 2019, May 12, 2021, October 13, 2021, June 12, 2024, and March 11, 2026.

Date: October 27, 2004
W.I.: 1255
Referred by: PAC

Re: Approval of Allocation of Regional Measure 2 funds for the I-580 Tri-Valley Rapid Transit Corridor Improvements Project

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION No. 3664

WHEREAS, pursuant to Government Code Section 66500 et seq., the Metropolitan Transportation Commission ("MTC") is the regional transportation planning agency for the San Francisco Bay Area; and

WHEREAS, Streets and Highways Code Sections 30950 *et seq.* created the Bay Area Toll Authority ("BATA") which is a public instrumentality governed by the same board as that governing MTC; and

WHEREAS, on March 2, 2004, voters approved Regional Measure 2, increasing the toll for all vehicles on the seven state-owned toll bridges in the San Francisco Bay Area by $1.00, with this extra dollar funding various transportation projects within the region that have been determined to reduce congestion or to make improvements to travel in the toll bridge corridors, as identified in SB 916 (Chapter 715, Statutes of 2004), commonly referred as Regional Measure 2 ("RM2"); and

WHEREAS, RM2 establishes the Regional Traffic Relief Plan and lists specific capital projects and programs and transit operating assistance eligible to receive RM2 funding as identified in Streets and Highways Code Sections 30914(c) & (d); and

WHEREAS, RM2 assigns administrative duties and responsibilities for the implementation of the Regional Traffic Relief Plan to MTC; and

WHEREAS, BATA shall fund the projects of the Regional Traffic Relief Plan by transferring RM2 authorized funds to MTC; and

WHEREAS, MTC adopted policies and procedures for the implementation of the Regional Measure 2 Regional Traffic Relief Plan on June 23, 2004, specifying the allocation criteria and project compliance requirements for RM 2 funding (MTC Resolution No. 3636); and

WHEREAS, the Alameda County Congestion Management Agency has submitted a request for the allocation of RM 2 funds for the I-580 Tri-Valley Rapid Corridor Improvements project; and

WHEREAS, I-580 Tri-Valley Rapid Corridor Improvements project is identified as capital project number 32 under RM 2 and is eligible to receive RM 2 funding as identified in Streets and Highways Code Sections 30914(c); and

WHEREAS, the Alameda County Congestion Management Agency has submitted an Initial Project Report ("IPR"), as required pursuant to Streets and Highway Code Section 30914(e), to MTC for review and approval; and

WHEREAS, Attachment A to this resolution, attached hereto and incorporated herein as though set forth at length, lists the project and phase for which the Alameda County Congestion Management Agency is requesting RM2 funding and the reimbursement schedule and amount recommended for allocation by MTC staff; and

WHEREAS, Attachment B to this resolution, attached hereto and incorporated herein as though set forth at length, lists the required project specific conditions which must be met prior to execution of the allocation and any reimbursement of RM2 funds; and

WHEREAS, Attachment C to this resolution, attached hereto and incorporated herein as though set forth at length, includes MTC staff's review of the Alameda County Congestion Management Agency's Initial Project Report (IPR) for this project; and

WHEREAS, Attachment D attached hereto and incorporated herein as though set forth at length, lists the cash flow of RM2 funds and complementary funding for the deliverable/useable RM2 project segment; now, therefore be it

RESOLVED, that MTC approves MTC staff's review of the Alameda County Congestion Management Agency's IPR for this project as set forth in Attachment C; and be it further

RESOLVED, that MTC approves the allocation and reimbursement of RM2 funds in accordance with the amount and reimbursement schedule for the phase, and activities as set forth in Attachment A; and, be it further

RESOLVED, that the allocation and reimbursement of RM2 funds as set forth in Attachment A are conditioned upon the Alameda County Congestion Management Agency complying with the provisions of the Regional Measure 2 Regional Traffic Relief Plan Policy and Procedures as set forth in length in MTC Resolution 3636; and be it further

RESOLVED, that the allocation and reimbursement of RM2 funds are further conditioned upon the project specific conditions as set forth in Attachment B; and, be it further

RESOLVED, that the allocation and reimbursement of RM2 funds as set forth in Attachment A are conditioned upon the availability and expenditure of the complementary funding as set forth in Attachment D; and be it further

RESOLVED, that reimbursement of RM2 funds as set forth in Attachment A is subject to the availability of RM2 funding; and be it further

RESOLVED, that a certified copy of this resolution, shall be forwarded to the project sponsor.

METROPOLITAN TRANSPORTATION COMMISSION

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Steve Kinsey, Chair

The above resolution was entered into by the Metropolitan Transportation Commission at the regular meeting of the Commission held in Oakland, California, on October 27, 2004.

REGIONAL MEASURE 2 PROGRAM
Allocation of Funds

Project Title: LAVTA Transit Signal Priority Upgrade and Expansion
Sponsor: Livermore Amador Valley Transit Authority
Project Number: 32.6

Allocation No. 32.6-1

Activities to be funded with Allocation #1:

This allocation will fund the design phase of the replacement of LAVTA's current Transit Signal Priority system and upgrade to a cloud-based Transit Signal Priority System, including planning, design, and engineering for installations at intersections in Dublin, Pleasanton, and Livermore and expansion of the vehicle-side TSP equipment to LAVTA's entire fleet.

Funding Information:

Allocation Instruction No.	Approval Date		Amount	Phase	Reimbursement Year		Cumulative Total
24366438	26-Jun-24	$	388,000	PSE	FY 2023-24	$	388,000

Allocation No. 32.6-2

Activities to be funded with Allocation #2:

This allocation will fund the implementation phase of the replacement of LAVTA's current Transit Signal Priority (TSP) system and upgrade to a cloud-based TSP System, including procurement of TSP software and equipment, installations at intersections in Dublin, Pleasanton, and Livermore, intallation and expansion of the vehicle-side TSP equipment to LAVTA's entire fleet, and up to six years of cloud-based TSP software licensing fees.

Funding Information:

Allocation Instruction No.	Approval Date		Amount	Phase	Reimbursement Year		Cumulative Total
26366439	26-Mar-26	$	2,306,970	CON	FY 2025-26	$	2,306,970

Cumulative Total - Project 32.6	2,694,970

REGIONAL MEASURE 2 PROGRAM
Project Specific Conditions

Project Title: LAVTA Transit Signal Priority Upgrade and Expansion
Sponsor: Livermore Amador Valley Transit Authority
Project Number: 32.6

The allocation and reimbursement of RM2 funds for the above project are conditioned upon the following.

1. None

Regional Measure 2 Regional Traffic Relief Plan

RM2 Project Number: 32.6

LAVTA Transit Signal Priority Upgrade and Expansion

Lead Sponsor	**Other Sponsors(s)**	**Implementing Agency** (if applicable)
Alameda County Transportation Commission	None	Livermore Amador Valley Transit Authority (LAVTA)

Legislated Project Description

Provide rail or High-Occupancy Vehicle lane direct connector to Dublin BART and other improvements on I-580 in Alameda County for use by express buses

RM2 Legislated Funding (in $1,000)	**Total Estimated Project Cost (in $1,000)**
$2,695	$2,861

Project Purpose and Description

LAVTA will alleviate congestion in the I-580 Corridor by upgrading the obsolete and unsupported GPS-based Transit Signal Priority (TSP) technology on its two Rapid routes (30R between West Dublin/Pleasanton BART and Lawrence Livermore/Sandia National Laboratories, and 10R between East Dublin/Pleasanton BART and the Livermore Transit Center/ACE Station) to a modern, cloud-based system, and expanding TSP functionality from 20 buses currently to the entire fleet of 68 buses.

Funding Description

Commited Funds: RM2, ACTC TFCA, TDA
Uncommitted Funds: none
Operating Capacity: LAVTA

Overall Project Cost and Schedule

Phase	Scope	Start	End	Cost (in $1,000)
1	Final Environmental Document and Preliminary Eng.	N/A	N/A	
2	Final Design - Plans, Specifications and Estimates	07/2024	01/2026	$388
3	Right-of-Way	N/A	N/A	
4	Construction	04/2026	12/2026	$2,473
			Total:	**$2,861**

Total Project Funding Plan: Committed and Uncommitted Sources

(Amounts Escalated in Thousands)

Project Title	**LAVTA Transit Signal Priority Upgrade and Expansion**	**Project No.** 32.6
Implementing Agency	Livermore Amador Valley Transit Authority (LAVTA)	

Fund Source	Phase	Prior	FY 2023-24	FY 2024-25	FY 2025-26	FY 2026-27	FY 2027-28	FY 2028-29	Future	Total
Committed										
RM2	PSE		388							388
RM2	CON				2,307					2,307
ACTC TFCA	CON				95					95
TDA	CON					71				71
										0
										0
										0
Total:		0	388	0	2,402	71	0	0	0	2,861
Uncommitted										
										0
Total:		0	0	0	0	0	0	0	0	0
Total Project Committed and Uncommited										
		Prior	**FY 2023-24**	**FY 2024-25**	**FY 2025-26**	**FY 2026-27**	**FY 2027-28**	**FY 2028-29**	**Future**	**Total**
Total:		0	388	0	2,402	71	0	0	0	2,861

REGIONAL MEASURE 2 PROGRAM
Project Cash Flow Plan

Project Title: LAVTA Transit Signal Priority Upgrade and Expansion
Sponsor: Livermore Amador Valley Transit Authority
RM2 Project Number: 32.6

	PRIOR	FY 2023-24	FY 2024-25	FY 2025-26	FY 2026-27	Future	Total
RM2 Funds Total	***-***	***-***	***-***	***440***	***1,105***	***1,150***	***1,545***
Environmental (ENV)	**0**	**0**	**0**	**0**	**0**	**0**	**0**
							0
Final Design (PS&E)	**0**	**0**	**0**	**200**	**188**	**0**	**388**
RM2				200	188		388
Right of Way	**0**	**0**	**0**	**0**	**0**	**0**	**0**
							0
Construction	**0**	**0**	**0**	**335**	**988**	**1,150**	**2,473**
RM2				240	917	1,150	2,307
ACTC TFCA				95			95
TDA					71		71
TOTAL FUNDING							
Environmental	0	0	0	0	0	0	**0**
Final Design (PS&E)	0	0	0	200	188	0	**388**
Right of Way	0	0	0	0	0	0	**0**
Construction	0	0	0	335	988	1,150	**2,473**
PROJECT TOTAL	0	0	0	535	1,176	1,150	2,861

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0377, **Version:** 1

Subject:
MTC Resolution No. 4529, Revised. An update to the allocation of State Transit Assistance (STA) Revenue-Based Exchange Funds to shift funds from BART to AC Transit for Transit Transformation Action Plan staffing.

Presenter:
Josie Ahrens

Recommended Action:
Commission Approval

Metropolitan Transportation Commission
Programming and Allocations Committee

March 11, 2026 **Agenda Item 2c-26-0280**

MTC Resolution No. 4529, Revised.

Subject:

An update to the allocation of State Transit Assistance (STA) Revenue-Based Exchange Funds to shift funds from BART to AC Transit for Transit Transformation Action Plan staffing.

Background:

In September 2021, the Commission accepted the Blue Ribbon Transit Recovery Task Force's 27-point Transit Transformation Action Plan (Action Plan). The Action Plan sets a course for accelerating the Bay Area's transit network transformation integrated with recovery actions in the wake of the pandemic. The Commission committed $85 million in near-term Blue Ribbon funding during the programming of American Rescue Plan (ARP) federal COVID-relief funds and a funding swap with transit operators and County Transportation Agencies to support implementation of the Action Plan. MTC Resolution No. 4519 establishes the funding framework for the $85 million in Action Plan funds, focused on near-term implementation activities for Fare Coordination/Integration, Regional Mapping and Wayfinding (Customer Information), Transit Priority on Roadways, and Accessibility. MTC Resolution No. 4529 allocates the STA Revenue-Based Exchange Fund portion of Action Plan funds.

On November 15, 2023, the Commission approved approximately $1.8 million to AC Transit and $1.9 million to BART for staff support of Action Plan implementation. On November 19, 2025, Resolution No. 4519 was updated via Delegated Authority to program a rescission of $152,000 from BART and program $152,000 to AC Transit for staff support. Staff proposes to update the corresponding Resolution No. 4529 to rescind $152,000 from BART and allocate $152,000 to AC Transit for staff support. The overall amount of the programming and allocations for staff support line item remains the same as does the overall amount for STA Exchange funds in the Transit Transformation Action Plan.

Issues:

None identified.

Recommendations:

Refer MTC Resolution No. 4529, Revised, to the Commission for approval.

Attachments:

- MTC Resolution No. 4529, Revised

Andrew B. Fremier

Date: November 15, 2023
W.I.: 1517
Referred by: Programming and Allocations (PAC)
Revised: 12/20/23-C, 5/22/24-C, 12/18/24-C, 06/25/25-C, 3/25/26-C

ABSTRACT
Resolution No. 4529, Revised

This resolution approves the allocation of State Transit Assistance (STA) Revenue-Based Exchange Funds based on the Blue Ribbon Transit Transformation Action Plan Funding Framework to projects identified in the Blue Ribbon Program of Projects.

The resolution contains the following attachments:

Attachment A – Allocation of State Transit Assistance (STA) Revenue-Based Exchange Funds

On December 20, 2023, Attachment A was revised to clarify eligible activities for the November 2023 allocations to AC Transit and BART, and to allocate $25,000 to support Transit Priority activities.

On May 22, 2024, Attachment A was revised to program approximately $6.8 million to SFMTA, AC Transit, Union City Transit, City of Concord, and City of San Jose to implement quick-build transit priority projects identified by the Bus Accelerated Infrastructure Delivery (BusAID) program.

On December 18, 2024, Attachment A was revised to reprogram approximately $6.8 million in BusAID program funding to MTC, which will be distributed to the previously-identified project sponsors through Master Funding Agreement Supplements.

On June 25, 2025, Attachment A was revised to allocate $1,100,000 to MTC to conduct a Regional Transit Assessment.

On March 25, 2026, Attachment A was revised to rescind $152,000 from BART and allocate $152,000 to AC Transit for staff support.

Further discussion is contained in the MTC Programming and Allocations Committee Summary Sheets dated December 13, 2023, May 8, 2024, December 11, 2024, June 11, 2025, and March 11, 2026 and the MTC Regional Network Management Committee Summary Sheet dated May 10, 2024.

Date: November 15, 2023
W.I.: 1517
Referred by: PAC

RE: Transit Transformation Action Plan State Transit Assistance (STA) Revenue-Based Exchange Funds

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4529

WHEREAS, the Metropolitan Transportation Commission (MTC) is the Regional Transportation Planning Agency (RTPA) for the San Francisco Bay Area pursuant to Government Code Section 66500 et seq.; and

WHEREAS, MTC is the designated Metropolitan Planning Organization (MPO) for the nine-county San Francisco Bay Area region; and

WHEREAS, MTC convened the Blue Ribbon Transit Recovery Task Force (Task Force) to respond to the COVID-19 pandemic; and

WHEREAS, the Task Force developed and endorsed the Transit Transformation Action Plan (Action Plan) in July 2021 and the Action Plan was received and accepted by MTC in September 2021; and

WHEREAS, the American Rescue Plan Act of 2021 (ARP) (H.R. 1319) was signed into law in response to the nationwide Coronavirus pandemic and provides supplemental appropriations for Emergency Transit Operations Assistance through the Federal Transit Administration (FTA) Section 5307 Urbanized Area and Section 5311 Rural Area formula programs; and

WHEREAS, MTC approved an ARP funding distribution policy in MTC Resolution No. 4481, which identified that a minimum of $85 million in ARP funds “should support the implementation of certain recommendations from the Blue Ribbon Transit Recovery Task Force”; and

WHEREAS, to best position Bay Area transit agencies to compete for additional FTA discretionary financial assistance, MTC distributed the reserved $85 million in ARP funds to operators and in return transit operators agreed to collectively provide an equivalent amount in

alternate near-term revenue sources to implement the Action Plan and recommendations from the Task Force; and

WHEREAS, MTC staff, in discussion with transit operators have identified the contribution amounts by operator or county and likely fund sources in MTC Resolution No. 4519, the Blue Ribbon Transit Transformation Action Plan Funding Framework and the Blue Ribbon Program of Projects, and MTC staff worked with transit operators to secure these funds; and

WHEREAS, the transit operators desiring to fulfill their Action Plan funding commitments with Revenue-based State Transit Assistance (STA) funds adopted resolutions to directly encumber a total of $49,101,973 in FY 2022-23 Revenue-based STA funds to MTC to implement the Action Plan; and

WHEREAS, the initiatives and related programming of STA Revenue-Based Exchange funds for each initiative are identified in MTC Resolution No. 4519; and

WHEREAS, MTC Resolution No. 4519 will be revised to identify projects and programming amounts under the various initiative as projects are ready to proceed; and

WHEREAS, Attachment A to this resolution, attached hereto and incorporated herein as though set forth at length, lists the amounts and purposes of STA Revenue-Based Exchange allocations requested by claimants, and is from time-to-time revised; and

WHEREAS, this resolution, including the revisions to Attachment A and the sum of all allocations made under this resolution, are recorded and maintained electronically by MTC; now therefore be it

RESOLVED, that MTC approves the allocation of STA Revenue-Based Exchange funds to the claimants, in the amounts, for the purposes, and subject to the conditions, as listed and recorded on Attachment A of this resolution; and be it further

RESOLVED, that, pursuant to 21 Cal. Code of Regs. §§ 6621 and 6753, a certified copy of this resolution, along with written allocation instructions for the disbursement of STA funds as allocated herein, shall be forwarded to the Alameda County Auditor; and, be it further

RESOLVED, that all STA Revenue-Based Exchange allocations are subject to continued compliance with MTC Resolution 4519, the Blue Ribbon Transit Transformation Action Plan Funding Framework and the Blue Ribbon Program of Projects; and, be it further

RESOLVED, that the Executive Director or designee is authorized to revise Attachment A to add projects and related allocations under each initiative up to $1,000,000; and be it further

RESOLVED, staff shall return to the Commission to revise this Resolution to add projects and related allocations that exceed $1,000,000.

METROPOLITAN TRANSPORTATION COMMISSION

Alfredo Pedroza, Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a duly called and noticed meeting held in San Francisco, California and at other remote locations on November 15, 2023.

Date: November 15, 2023
W.I.: 1517
Referred by: PAC
Revised: 12/20/23-C, 5/22/24-C, 12/18/24-C, 6/25/25-C, 3/25/26-C

Attachment A: Allocation of State Transit Assistance (STA) Revenue-Based Exchange Funds

All STA Revenue-Based Exchange allocations are consistent with MTC Resolution 4519, the Blue Ribbon Transit Transformation Action Plan Funding Framework and the Blue Ribbon Program of Projects.

Claimant	Project Description	Allocation Amount	Approval Date
AC Transit[1]	Staff Support	$1,764,738	11/15/2023
BART[1]	Staff Support	$1,919,960	11/15/2023
MTC	Transit Priority Policy	$25,000	12/20/2023
~~SFMTA~~ MTC	BusAID: K-Ingleside Rapid Project Ocean Avenue Quick-Build	$2,800,000	~~5/22/2024~~ 12/18/2024
~~AC Transit~~ MTC	BusAID: Park Street Transit Signal Priority & Signal Optimization	$1,094,418	~~5/22/2024~~ 12/18/2024
~~Union City~~ MTC	BusAID: Alvarado-Niles Road Part-Time Transit Lane Pilot	$1,507,688	~~5/22/2024~~ 12/18/2024
~~Concord~~ MTC	BusAID: Monument Corridor Transit Speed Improvements	$385,885	~~5/22/2024~~ 12/18/2024
~~San Jose~~ MTC	BusAID: Cloud-Based TSP at 174 Intersections along VTA's Frequent Network	$972,113	~~5/22/2024~~ 12/18/2024
MTC	Regional Transit Assessment	$1,100,000	6/25/2025
BART	Staff Support	-$152,000	3/25/2026
AC Transit	Staff Support	$152,000	3/25/2026
	Total	$11,569,802	

Notes:

1. Fiscal year 2022-23 expenses (beginning July 1, 2022) are eligible for reimbursement from these allocations.

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0378, **Version:** 1

Subject:
MTC Resolutions Nos. 3989, Revised, and 4505, Revised. Various revisions to the MTC Exchange and One Bay Area Grant (OBAG 3) Program for Bay Wheels extension.

Presenter:
Thomas Arndt

Recommended Action:
Commission Approval

Metropolitan Transportation Commission
Programming and Allocations Committee

March 11, 2026 **Agenda Item 2d-26-0279**

MTC Resolutions Nos. 3989, Revised and 4505, Revised

Subject:

Various revisions to the One Bay Area Grant (OBAG 3) and MTC exchange programs, including programming $2.4 million to MTC for the Bay Wheels contract extension.

Background:

The OBAG 3 program establishes the policy and programming framework for investing federal Surface Transportation Block Grant Program (STP) and Congestion Mitigation and Air Quality Improvement program (CMAQ) funds for FY 2023 through FY 2026.

MTC's fund exchange program provides greater flexibility to deliver select priority projects within the broader OBAG framework. MTC Resolution No. 3989, Revised, describes the procedures governing MTC's exchange program and details the agreements and commitments that have been made to date. The program facilitates funding agreements with partner agencies to exchange federal STP/CMAQ funds with non-federal local funds. These exchanges do not increase the total amount of funds available to the region but enable MTC to support key investments within the OBAG policy framework that are ineligible for STP/CMAQ funds.

This month, staff recommend revisions to the OBAG 3 and MTC exchange programs as detailed below.

Regional Bikeshare

At the Regional Network Management (RNM) Committee this month, staff will recommend extending the contract for the Bay Wheels regional bikeshare service with the current provider for five additional years (through July 2032). The proposed contract extension would maintain and expand this popular service, allowing MTC to maximize previous system investments and continue to deliver benefits to riders across the region.

With this item, staff recommend reprogramming $2.4 million in OBAG 3 funds to MTC for the Bay Wheels contract extension from the following sources:

- $1,250,000 in remaining regional bikeshare balances,
- $600,000 in regional transportation demand management (TDM) balances, and
- $560,000 previously programmed to MTC for bikeshare station electrification (project will be delivered by the contractor under the proposed Bay Wheels contract extension).

As part of this recommendation, staff recommend changing the fund source for the bikeshare and TDM balances from federal STP/CMAQ to non-federal MTC exchange funds, as the existing contract and proposed extension are ineligible for federal funds.

This action as proposed would fully program the $20 million in OBAG 3 regional capacity initially set aside for the bikeshare program by the Commission. Further regional support for this program will be contingent on other funding sources, such as OBAG 4.

Issues:

None.

Recommendations:

Refer MTC Resolution Nos. 3989, Revised and 4505, Revised to the Commission for approval. The Bay Wheels contract extension will also be considered by the RNM Committee this month. Only items approved by both Committees will be forwarded to the Commission for approval.

Attachments:

- MTC Resolution No. 4505, Revised
  - Attachment B-1
- MTC Resolution No. 3989, Revised
  - Attachment B

Andrew B. Fremier

Date: January 26, 2022
W.I.: 1512
Referred by: PAC
Revised: 02/23/22-C 03/23/22-C 06/22/22-C
09/28/22-C 10/26/22-C 11/16/22-C
01/25/23-C 02/22/23-C 03/22/23-C
04/26/23-C 05/24/23-C 06/28/23-C
07/26/23-C 09/27/23-C 10/25/23-C
11/15/23-C 12/20/23-C 02/28/24-C
03/27/24-C 04/24/24-C 05/22/24-C
06/26/24-C 07/24/24-C 09/25/24-C
11/20/24-C 12/18/24-C 01/22/25-C
02/26/25-C 06/25/25-C 09/24/25-C
10/22/25-C 11/19/25-C 12/17/25-C
02/25/26-C 03/25/26-C

ABSTRACT

Resolution No. 4505, Revised

Adoption of the project selection and programming policies for the third round of the One Bay Area Grant program (OBAG 3). The project selection and programming policies contain the project categories that are to be funded with various fund sources, including federal surface transportation act funding assigned to MTC for programming, to implement the Regional Transportation Plan (*Plan Bay Area 2050*) and to be included in the federal Transportation Improvement Program (TIP) for the OBAG 3 funding delivery period.

The resolution includes the following attachments:

Attachment A – OBAG 3 Project Selection and Programming Policies
Attachment B – OBAG 3 Project Lists

With the adoption of the project selection and programming policies, Attachments B-1 and B-2 program $8,300,000 to Regional Planning Activities, $37,200,000 for OBAG 3 Program and Project Implementation, and $4,000,000 for Program and Project Implementation for transit transformation activities within the Planning and Program Implementation Regional Program; and $35,157,000 for CTA Planning Activities within the Planning and Program Implementation County & Local Program.

On February 23, 2022, Attachment B-1 was revised to program $30,000,000 in OBAG 3 Regional Multimodal Systems Operations and Performance Program funds to the Clipper C2 Capital project as part of an alternative funding plan for the project's Regional Measure 3 (RM3) funds.

On March 23, 2022, Appendix A-1 was added to incorporate guidelines for the County and Local Program call for projects.

On June 22, 2022, Attachments A, B-1, B-2, and Appendix A-1 were revised to further define program categories and program $80,800,000 million to various projects within the Regional Program, including $31,600,000 for Transit Transformation Action Plan programs and $7 million for future SamTrans projects as part of a Caltrain right-of-way (ROW) repayment arrangement; program $11,762,000 for ongoing Safe Routes to School Non-Infrastructure programs within the County & Local Program; add $7,000,000 in additional anticipated revenues to the Regional Program; and clarify language related to local policy requirements and project eligibilities within the County & Local Program.

On September 28, 2022, Attachments B-1 and B-2 were revised to program $14,000,000 to 511 Traveler Information Services within the Regional Travel Demand Management (TDM) Program, $1,280,000 in the Regional Vision Zero/Safety Program for Local Roadway Safety Plan Development, $2,500,000 for Bay Trail Planning, Delivery, and Technical Assistance projects within the Regional Active Transportation Plan Implementation Program, and $86,900,000 to various projects within the Multimodal Systems Program; assign $7,000,000 in Multimodal Systems Program funds previously committed to SamTrans as part of MTC's Caltrain Right-of-Way repayment to SamTrans' Preventative Maintenance project; and add $620,000 in County & Local Program funds to San Mateo C/CAG's Safe Routes to School Non-Infrastructure Program project.

On October 26, 2022, Attachments B-1 and B-2 were revised to program $43,800,000 within the Climate Initiatives Program, $25,000,000 within the Growth Framework Implementation program, $18,166,000 in County & Local Program for CTA Planning Activities, and $7,613,000 in County & Local Program funds to Alameda County Transportation Commission's Safe Routes to School Non-Infrastructure Program.

On November 16, 2022, Attachment B-1 was revised to program $6,000,000 from the Regional Active Transportation Plan Implementation balance to two Bay Skyway projects: $1,900,000 to MTC's West Oakland Link and $4,100,000 to SFCTA's Yerba Buena Island Multi-Use Path.

On January 11, 2023, Attachments B-1 and B-2 and Appendix A were revised to program $301,682,000 in County & Local Program funds to various projects throughout the region, and

$300,000 to MTC's Active Transportation Technical Assistance Program within the Regional Complete Streets and Community Choice Program; and to clarify programming policy requirements for OBAG 3 projects involved in local fund exchanges.
On February 22, 2023, Attachment B-1 was revised to direct $20,000,000 within the Climate Initiatives program to MTC for Bay Wheels Bikeshare E-Bike Expansion; and revise the name of MTC's Regional Carpool Program to Regional Carpool/Vanpool Program to reflect the full scope of the program.

On March 22, 2023, Attachments A, B-1, and B-2 were revised to change the fund source of $15,940,000 programmed to MTC's Bay Wheels Bikeshare E-Bike Expansion from STP/CMAQ to non-federal funds in the MTC exchange program; reprogram $1,600,000 in Regional Commuter Benefits Program funds from MTC to the Bay Area Air Quality Management District; program $1,000,000 to Napa Valley Transportation Authority's State Route 29 American Canyon Operational and Multimodal Improvements project; program $1.2 million within the Regional Forward Programs to MTC's Bay Bridge Forward I-80/Powel Interchange Transit Access project; revise County & Local Program awards for Alameda County's Mission Boulevard Phase III Corridor Improvements and Lafayette's School Street Class I Multiuse Facility from $9,657,000 to $4,950,000 and $3,435,000 to $750,000, respectively; add $8,000,000 in additional anticipated revenues to the County & Local Program and $1 million to the Regional Program; and program $15,392,000 in available capacity to various projects on the County & Local Program contingency list.

On April 26, 2023, Attachment A was revised to clarify the County & Local Program programming requirements.

On May 24, 2023, Attachments B-1 and B-2 were revised to reprogram $750,000 in Regional Program funds from MTC's Bay Trail Project Delivery to MTC's Bay Trail Implementation, reprogram $23,800,000 to various projects and programs within the Climate Initiatives Program, reprogram $21,540 in County & Local Program funds from BART's Elevator Modernization Phase 1.3 project to MTC's Regional Carpool/Vanpool project, and revise the sponsor for Priority Development Area (PDA) Planning projects in both the County & Local and Regional Programs to MTC.

On June 28, 2023, Attachment B-1 was revised to program $17,000,000 in Regional Growth Framework Implementation funds to various Priority Development Area (PDA) Planning and

Priority Production Area (PPA) Pilot projects; and program $2,844,000 in Regional Climate Initiatives funds to various Mobility Hub Planning and Parking Program Planning projects.

On July 26, 2023, Attachments B-1 and B-2 were revised to reflect the fund source change from STP to Coronavirus Response and Relief Supplemental Appropriations Act (CRRSAA) funding for $16,727,000 as follows: $14,677,000 for MTC's CTA Planning Activities Supplemental project within the County & Local Program; and $1,650,000 for MTC's Community-Based Transportation Plans and $400,000 for MTC's Local Roadway Safety Plan Development project within the Regional Complete Streets and Community Choice program.

On September 27, 2023, Attachment B-1 was revised to program $4,700,000 in Regional Active Transportation Plan Implementation balances to MTC's Active Transportation Technical Assistance Program, add MTC as the project sponsor for $15,000,000 in Transportation Electrification planning projects, and revise the project names for two of MTC's PDA Planning Grants in Fairfield and Suisun City to indicate that the Solano Transportation Authority will be facilitating project delivery.

On October 25, 2023, Attachment B-1 was revised to program $1,500,000 to MTC for Engagement and Capacity Building for Community-Based Transportation Plans (CBTP's) and the Community Action Resource and Empowerment (CARE) Program, and $600,000 to MTC for Bay Wheels Bikeshare E-Bike Expansion station siting, marketing, and incentives; and to reflect fund sources and fund source changes (in accordance with MTC Resolution No. 3989) for MTC's Engagement and Capacity Building for CBTP's and CARE program, various projects within the Priority Production Area (PPA) Pilot Program, and MTC's Bay Wheels Bikeshare E-Bike Expansion project.

On November 15, 2023, Attachment B-1 was revised to program $6,600,000 to MTC for Mapping & Wayfinding; program $1,500,000 to MTC for PCA Program Implementation and reflect the fund source change from STP/CMAQ to non-federal MTC exchange funds (as programmed in MTC Resolution No. 3989, Revised); reflect the fund source change for $300,000 of MTC's Active Transportation Technical Assistance project from STP/CMAQ to non-federal Planning, Programming, and Monitoring (PPM) funds; and distribute the funds previously programmed to MTC for Connected Bay Area/Incident Management to MTC's component projects, Connected Bay Area ($24,400,000) and Incident Management ($4,000,000).

On December 20, 2023, Attachments A, B-1, and B-2, and Appendix A-1 were revised to update the Housing Element compliance requirements for the County & Local Program; reprogram $4,850,000 in Regional and County & Local funds from SFCTA's Yerba Buena Island Multi-Use Path to SFMTA for Light Rail Vehicles as part of a local fund exchange and revise the project names to reflect related roadway improvement supporting the multi-use path; reprogram $2,200,000 in County & Local Program funds from BART's Elevator Modernization Phase 1.3 project to MTC's Regional Carpool/Vanpool project; and program $2,110,000 in Regional Program funds to Active Transportation Technical Assistance Program projects, including changing the fund source of $560,000 from STP/CMAQ to non-federal MTC exchange funds.

On February 28, 2024, Attachment B-1 was revised to add $9,300,000 in Regional Climate Initiatives funds to the Mobility Hubs Capital Grants unprogrammed balance, reflect the $8,500,000 in Regional Priority Conservation Area (PCA) Grant Program funds available for the PCA Call for Projects, Phase I, and program $1,000,000 in Regional Adaptive Ramp Metering funds to MTC for Adaptive Ramp Metering on State Route 237 in Santa Clara County.

On March 27, 2024, Attachments B-1 and B-2 were revised to reprogram $2,000,000 in Regional Vision Zero/Safety Program funds from MTC's Bay Area Vision Zero Data System to MTC for Enhancing Support for Safety in the Bay Area, and change the fund source from STP/CMAQ to non-federal MTC exchange funds; reprogram $80,000 in Regional Vision Zero/Safety Program funds from MTC's Regional Safety Program Coordination and Outreach to MTC for the Bay Area Vision Zero Data System, and change the fund source from STP/CMAQ to non-federal MTC exchange funds; change the funds source of $2,000,000 in Regional Pavement & Asset Management Program funds for MTC's Pavement Management Program (PMP) from STP/CMAQ to non-federal MTC exchange funds; program $1,000,000 in County & Local Program funds from the Alameda County Transportation Commission's (ACTC's) San Pablo Avenue Parallel Bike Network to ACTA and the City of Albany for the Jackson Street portion of the same project; and change the fund source for $400,000 in Active Transportation Technical Assistance Program projects from STP/CMAQ to non-federal MTC exchange funds.

On April 24, 2024, Attachment A and Appendix A-1 were revised to standardize County & Local Program compliance requirement language.
On May 22, 2024, Attachments B-1 and B-2 were revised to deprogram $27,730,000 in County & Local Program funds from the City of San Jose's Story-Keyes Complete Streets project as part of a fund source change, program $11,555,000 in Regional Transit Priority funds to various

projects within the Bus Accelerated Infrastructure Delivery (BusAID) program, program $6,000,000 in Local Public Fleet Electrification Planning Assistance funds to MTC for various local agencies, change the fund source for $350,000 in Bay Trail Project Delivery funds from STP/CMAQ to non-federal MTC exchange funds, and program $30,000 in Parking Management Planning balances to MTC for Concord's Downtown Parking Technology Solutions Study.

On June 26, 2024, Attachment B-1 was revised to reflect the programming of $5,000,000 in non-federal MTC exchange funds to the Bay Area Housing Finance Authority (BAHFA) for county election cost reimbursement related to the 2024 regional housing bond measure.

On July 24, 2024, Attachment B-1 was revised to program $1,500,000 to MTC's Bay Trail Marshlands Road project, program $560,000 in bikeshare funds to MTC for station electrification, change the fund source for $660,000 in bikeshare funds from STP/CMAQ to non-federal MTC exchange funds, and reflect reprogramming of these exchange funds to various projects.

On September 25, 2024, Attachment B-1 was revised to reprogram $1,250,000 in Regional Program bikeshare funds from e-bike expansion to MTC for Bay Wheels bikeshare expansion in Daly City, changing the fund source for this project from STP/CMAQ to non-federal MTC exchange funds; reprogram $300,000 in Regional Program bikeshare funds from e-bike expansion to MTC for bikeshare outreach; and program $240,000 in Regional Program Mobility Hub planning balances to MTC for Mobility Hubs and Parking Management technical assistance.

On November 20, 2024, Attachment B-1 was revised to program $8,500,000 in Regional Priority Conservation Area (PCA) funds to various projects, including changing the fund source for $4,950,000 of that total from STP/CMAQ to non-federal MTC Exchange; reprogram $2,000,000 from MTC's Priority Development Area (PDA) Planning Program to MTC's Regional Housing Technical Assistance (RHTA) Program; deprogram $4,600,000 from MTC's Mapping & Wayfinding project; program $3,950,000 to various Innovative Deployments for Enhanced Arterials Transit Signal Priority (IDEA TSP) and Bus Accelerated Infrastructure Delivery (BusAID) projects; add $650,000 to BusAID unprogrammed balance; reprogram $4,640,000 within MTC's Regional Vision Zero/Safety Program to various projects; and deprogram $415,000 from MTC's Cotati Santero Way PDA Planning project.

On December 18, 2024, Attachments B-1 and B-2 were revised to reprogram $10,000,000 in County & Local Program funds among various component projects of the Alameda County Transportation Commission's (ACTC's) San Pablo Avenue corridor improvements, reprogram $800,000 from MTC's Sonoma County Airport Area Specific Plan to MTC's Regional Housing Technical Assistance, and revise the project sponsor from San Mateo County to Redwood City for the Bay Road Complete Street Rehabilitation project in the County & Local Program.

On January 22, 2025, Attachment B-1 was revised to change the fund source for $250,000 in Priority Conservation Area (PCA) funds for the Peninsula Open Space Trust's (POST's) Coyote Valley Wildlife Connectivity Planning project from non-federal MTC exchange funds to STP/CMAQ, update the sponsor for the same project to include the Santa Clara Valley Transportation Authority (VTA), correct the amount of non-federal MTC exchange funds programmed to other PCA projects, and update the total balance of OBAG 3 funds available for the PCA program from $8,050,000 to $8,000,000.

On February 26, 2025, Attachment B-1 was revised to program $1,000,000 in Adaptive Ramp Metering (ARM) balances to MTC for ARM on SR4 in Contra Costa County.

On March 26, 2025, Attachment B-1 was revised to program $12,670,000 in Growth Framework Implementation funds to various projects, including changing the fund source for $3,225,000 of these funds from federal STP/CMAQ to non-federal MTC Exchange for Regional Housing Technical Assistance projects and reprogramming $1,600,000 from two previously awarded Priority Development Area (PDA) planning projects to various projects; program $10,103,000 in Mobility Hubs funds to various planning and capital projects; program $4,322,000 in Parking Management funds to various planning and capital projects; program $2,740,000 in Active Transportation Technical Assistance funds to various projects and change the fund source for the full amount from federal STP/CMAQ to non-federal MTC exchange funds; change the fund source for $750,000 in Priority Conservation Area (PCA) funds for San Francisco Recreation and Parks' Visitacion Avenue Bicycle and Pedestrian Safety Improvements from federal STP/CMAQ to non-federal MTC exchange funds; and change the fund source for $80,000 in Regional Vision Zero/Safety Program funds for MTC's Bay Area Vision Zero Data System (BayViz) from federal STP/CMAQ to non-federal MTC exchange funds.

On June 25, 2025, Attachments B-1 and B-2 were revised to reprogram $2,000,000 in OBAG 3 Multimodal Systems Programs funds from MTC's Express Lanes Studies and Pilots to MTC for

Adaptive Ramp Metering implementation on US 101 in Marin and Sonoma Counties ($1,000,000) and on I-80 in Solano County ($1,000,000), reprogram $505,000 in County & Local Program funds from Sausalito's Bridgeway Bike Lanes project to San Jose's Jackson Ave project, reprogram $240,000 in OBAG 3 Climate Initiatives funds from MTC's Mobility Hubs and Parking Management Technical Assistance project to MTC's Regional Housing Technical Assistance (RHTA) implementation project and change the fund source from STP/CMAQ to non-federal MTC exchange funds, and change the project name for MTC's TOC Housing Policy Development project in San Mateo County to reflect that the City of Belmont will be contracting with MTC on this project on behalf of multiple jurisdictions in the County.

On September 24, 2025, Attachment B-1 was revised to reflect reprogramming of $5,000,000 in non-federal MTC exchange funds from the Bay Area Housing Finance Authority's (BAHFA's) Regional Housing Bond – County Election Cost Reimbursement project to MTC for BAHFA's Mixed-Income Loan Fund, reprogram $1,100,000 in Multimodal System Program funds from MTC's Regional Communications Infrastructure project to MTC for the Pacific Flyway Fund's Pacific Flyway Center – Walk in the Marsh project ($1,000,000) and to MTC for Priority Conservation (PCA) Program Implementation ($100,000), changing the fund source for these funds from federal STP/CMAQ to non-federal MTC Exchange; reprogram $350,000 in STP/CMAQ funds from MTC's Bay Trail Planning project to MTC's Bay Trail Implementation project; reflect reprogramming $350,000 in non-federal MTC Exchange funds from MTC's Bay Trail Implementation project to MTC's Bay Trail Planning Project; and program $250,000 in Bay Trail Technical Assistance funds to MTC for Oakland's Doolittle Drive Bay Trail Gap Closure project, changing the fund source from federal STP/CMAQ to non-federal MTC Exchange.

On October 22, 2025, Attachments B-1 and B-2 were revised to program $18,650,000 in County Program funds to various CTAs for planning activities, program $22,800,000 in Forwards Program balances to MTC for various projects, reprogram $15,941,000 in Alameda County Program funds between Alameda County Transportation Commission (ACTC) projects, program $13,000,000 in Transit Priority Highway balances to MTC for various projects, program $12,689,000 in Regional Program funds to MTC for program and project implementation, program $4,200,000 in County Program funds to various CTAs for Safe Routes to Schools Non-Infrastructure programs, program $3,000,000 in Optimized Freeway Corridor Operations balances to MTC for US 101 Optimized Corridor Operations in Santa Clara and San Mateo Counties, program $2,000,000 in Adaptive Ramp Metering (ARM) balances to MTC for ARM

on I-680 in Contra Costa County, program $750,000 in Transportation Demand Management balances to MTC for various projects, and to change the funds source for MTC's $560,000 Bikeshare Station Electrification project from federal STP/CMAQ to non-federal MTC Exchange.

On November 19, 2025, Attachments B-1 and B-2 were revised to program $315,000 to MTC for the 2026 Statewide Local Streets and Roads Needs Assessment and change the fund source to non-federal MTC exchange, add Caltrain as a co-sponsor for the Middle Ave Caltrain Pedestrian and Bicycle Undercrossing project within the OBAG 3 County & Local Program, and replace MTC with Fremont as the sponsor for the Bay Trail Marshlands Road Phase 1 project within the OBAG 3 Bay Trail Program.

On December 17, 2025, Attachment B-1 was revised to reprogram $1,500,000 in CARE balances to MTC for Power-Building and Engagement, revising the existing project name and changing the fund source for the new programming to non-federal MTC exchange; and program an additional $150,000 to MTC for Transportation Authority of Marin (TAM) Community-Based Transportation Plans.

On February 25, 2026, Attachments B-1 and B-2 were revised to program $12,000,000 in CARE balances to MTC for CARE CBTP Technical Assistance Implementation and change the fund source from federal STP/CMAQ to non-federal MTC exchange, reflect programming of $1,000,000 in CARE Power Building and Engagement funds to specific projects, change the fund source for $100,000 in Regional Vision Zero/Safety Program funds for MTC's Bay Area Vision Zero Data System (BayViz) from federal STP/CMAQ to non-federal MTC exchange funds, deprogram $18,650,000 in County & Local Program funds for base planning activities from various County Transportation Agencies (CTAs), and deprogram $12,689,000 in Regional Program funds for program and project implementation from MTC.

On March 25, 2026, Attachment B-1 was revised to program $1,850,000 in Climate, Conservation, and Resilience funds to MTC for the Bay Wheels contract extension and change the fund source from federal STP/CMAQ to non-federal MTC exchange, redirecting $1,250,000 from Bay Wheels Bikeshare E-bike Expansion and $600,000 from Regional Transportation Demand Management (TDM). The resolution was also revised to reflect the repurposing of $560,000 in non-federal MTC exchange funds from MTC's Bikeshare Station Electrification to the Bay Wheels contract extension.

Further discussion of the project selection criteria and programming policy is contained in memorandums to the Programming and Allocations Committee dated January 12, 2022, February 9, 2022, March 9, 2022, June 8, 2022, September 14, 2022, October 12, 2022, November 9, 2022, January 11, 2023, February 8, 2023, March 8, 2023, April 12, 2023, and May 10, 2023; the Planning Committee dated June 9, 2023; the Programming and Allocations Committee dated June 14, 2023, July 12, 2023, September 13, 2023, October 11, 2023, November 8, 2023; the Planning Committee dated December 8, 2023; and the Programming and Allocations Committee dated December 13, 2023, February 14, 2024, March 13, 2024, April 10, 2024, May 8, 2024, June 12, 2024, July 10, 2024, September 11, 2024, November 13, 2024, December 11, 2024, January 8, 2025, February 12, 2025, March 12, 2025, June 11, 2025, September 10, 2025, October 8, 2025, November 12, 2025, December 10, 2025, February 11, 2026, and March 11, 2026.

Date: January 26, 2022
W.I.: 1512
Referred by: PAC

RE: One Bay Area Grant Program (OBAG 3) Project Selection and Programming Policies

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4505

WHEREAS, the Metropolitan Transportation Commission (MTC) is the Regional Transportation Planning Agency (RTPA) for the San Francisco Bay Area pursuant to Government Code Section 66500 *et seq*.; and

WHEREAS, MTC is the designated Metropolitan Planning Organization (MPO) for the nine-county San Francisco Bay Area region and is required to prepare and endorse a Transportation Improvement Program (TIP) which includes federal funds; and

WHEREAS, MTC, as the RTPA/MPO for the San Francisco Bay Area, is assigned programming and project selection responsibilities for certain state and federal funds; and

WHEREAS, state and federal funds assigned for RTPA/MPO programming discretion are subject to availability and must be used within prescribed funding deadlines; and

WHEREAS, the California Department of Transportation (Caltrans) Obligation Authority (OA) Management Policy allows RTPAs and MPOs to exchange regional Surface Transportation Block Grant Program (STP), Congestion Mitigation and Air Quality Improvement Program (CMAQ), and other federal funds assigned to the RTPA or MPO with Caltrans and other regions, when a region or Caltrans-managed local program has excess or insufficient apportionment available to deliver its annual federal program; and

WHEREAS, Title 23 CFR § 630, Subpart G, allows the advancement of federal-aid projects and expenditure of eligible costs prior to the obligation of funds (referred to as "Advance Construction" or "AC") with reimbursement of eligible expenditures permitted following conversion of the AC to a regular obligation; and

WHEREAS, MTC, in cooperation with transit operators, Caltrans, the Bay Area Air Quality Management District (BAAQMD), Bay Area County Transportation Agencies (CTAs), counties, cities, and interested stakeholders, has developed policies and procedures to be used in the selection of projects to be funded with various funding including regional federal funds as set

forth in Attachments A and B of this Resolution, incorporated herein as though set forth at length; and

WHEREAS, using the policies set forth in Attachment A of this Resolution, MTC, in cooperation with the Bay Area Partnership and interested stakeholders, will develop a program of projects to be funded with these funds for inclusion in the federal TIP, as set forth in Attachment B of this Resolution, incorporated herein as though set forth at length; and

WHEREAS the federal TIP and subsequent TIP revisions and updates are subject to public review and comment; now therefore be it

RESOLVED that MTC approves the "Project Selection and Programming Policies" for projects to be funded in the OBAG 3 program as set forth in Attachments A and B of this Resolution; and be it further

RESOLVED that the funds assigned to MTC as the RTPA/MPO for programming and project selection shall be pooled and distributed on a regional basis for implementation of project selection criteria, policies, procedures, and programming, consistent with implementation of the Regional Transportation Plan (RTP); and be it further

RESOLVED that the projects will be included in the federal TIP subject to final federal approval and requirements; and be it further

RESOLVED that the Executive Director or designee may make technical adjustments and other non-substantial revisions, including changes to project sponsor, updates to fund sources and distributions to reflect final funding criteria and availability; and be it further

RESOLVED that the Executive Director or designee is authorized to revise Attachment B as necessary to reflect the programming of projects as the projects are selected, revised, and included in the federal TIP; and be it further

RESOLVED that the Executive Director or designee is authorized to execute Advance Construction (AC) Authorizations with Caltrans and/or the Federal Highway Administration (FHWA) for federal projects sponsored or implemented by the Metropolitan Transportation Commission; and be it further

RESOLVED that the Executive Director or designee is authorized to execute agreements and Letters/Memorandums of Understanding with Caltrans and other MPOs and RTPAs for the exchange of regional Surface Transportation Block Grant Program (STP), Congestion Mitigation and Air Quality Improvement Program (CMAQ) and other federal funds assigned to MTC for programming discretion, consistent with Caltrans' Obligation Authority (OA) Management Policy; and be it further

RESOLVED that the Executive Director or designee shall make available a copy of this resolution, and attachments as may be required and appropriate.

METROPOLITAN TRANSPORTATION COMMISSION

Alfredo Pedroza, Chair

The above resolution was entered into
by the Metropolitan Transportation
Commission at the regular meeting
of the Commission held in San Francisco,
California and at other remote locations
on January 26, 2022

Attachment B-1
MTC Resolution No. 4505
OBAG 3 Regional Programs
FY 2022-23 through FY 2025-26
March 2026

MTC Res. No. 4505 Attachment B-1
Adopted: 01/26/22-C
Revised: 02/23/22-C 06/22/22-C 09/28/22-C 10/26/22-C 11/16/22-C
01/25/23-C 02/22/23-C 03/22/23-C 05/24/23-C 06/28/23-C 07/26/23-C
09/27/23-C 10/25/23-C 11/22/23-C 12/20/23-C 02/28/24-C 03/27/24-C
05/22/24-C 06/26/24-C 07/24/24-C 09/25/24-C 11/20/24-C 12/18/24-C
01/22/25-C 02/26/25-C 03/26/25-C 06/25/25-C 09/24/25-C 10/22/25-C
11/19/25-C 12/17/25-C 02/25/26-C 03/25/26-C

OBAG 3 Regional Programs Project List

PROJECT CATEGORY AND TITLE	SPONSOR	Total STP/CMAQ	Total Other
OBAG 3 REGIONAL PROGRAMS		**$339,075,000**	**$115,990,000**
1. PLANNING AND PROGRAM IMPLEMENTATION			
Planning and Program Implementation			
Regional Planning Activities	MTC	$8,300,000	
Program and Project Implementation	MTC	$37,200,000	
Program and Project Implementation - Transit Transformation	MTC	$4,000,000	
1. PLANNING AND PROGRAM IMPLEMENTATION		**$49,500,000**	**$0**
2. GROWTH FRAMEWORK IMPLEMENTATION			
Growth Framework Implementation			
PDA Planning and Technical Assistance Grants			
Alameda County: San Lorenzo Village Specific Plan	MTC	$600,000	
Benicia: Eastern Gateway Infrastructure Master Plan	MTC	$312,000	
Fairfield/STA: Solano Rail Hub Residential Cluster	MTC	$200,000	
Millbrae: El Camino Real Streetscape Plan Implementation	MTC	$200,000	
Millbrae: MSASP Amend - Integrated Multi-Modal Transit Stn	MTC	$600,000	
Milpitas: Innovation District Parks and Trails Master Plan	MTC	$200,000	
Milpitas: Milpitas Main Street Sense of Place Plan	MTC	$600,000	
Moraga: Moraga Center Specific Plan	MTC	$600,000	
Moraga: Moraga Center Specific Plan Amendments	MTC	$88,000	
Orinda: Path for Affordable Housing TOD at Orinda BART	MTC	$200,000	
Petaluma: Corona Road SMART Station PDA Specific Plan	MTC	$1,150,000	
San Carlos: Downtown Together - Downtown Specific Plan	MTC	$300,000	
San Francisco: Well-Resourced PDAs Zoning Plan	MTC	$1,035,000	
San Leandro: Bay Fair TOD Specific Plan Amendment	MTC	$600,000	
San Leandro: Bay Fair TOD Sub-Area 1 Precise Plan	MTC	$1,200,000	
Santa Rosa: South Santa Rosa Specific Plan	MTC	$1,200,000	
Sebastopol: Workforce Housing Zoning	MTC	$250,000	
Suisun City/STA: PDA Project Implementation	MTC	$200,000	
Vacaville: Allison Policy Plan	MTC	$1,200,000	
Vallejo: Downtown Amend and Streetscape Impl	MTC	$1,200,000	
Priority Production Area (PPA) Pilot Program			
Benicia: Port of Benicia - Infras. & Facility Modernization Plan	MTC	$0	$750,000
CC County: N Waterfront PPAs Technical Assistance Project	MTC	$0	$500,000
East Bay Econ Dev Alliance: Next Gen EB Indust Bldgs/Dists	MTC	$0	$500,000
STA: Aligning Middle Wage Jobs with Housing in Solano County	MTC	$0	$500,000
Regional Housing Initiatives			
BAHFA: Mixed-Income Loan Fund	MTC	$0	$5,000,000
Regional Housing Technical Assistance	MTC		
Alameda County CDA: TOC Housing Policy Development	MTC	$0	$400,000
Emeryville: TOC Housing Policy Development	MTC	$0	$250,000
Marin County: TOC Housing Policy Development	MTC	$0	$400,000
Menlo Park: TOC Housing Policy Development	MTC	$0	$250,000
Belmont: TOC Housing Policy Development in San Mateo County	MTC	$0	$500,000
Morgan Hill: TOC Housing Policy Development	MTC	$0	$200,000
Windsor: TOC Housing Policy Development	MTC	$0	$200,000
RHTA Implementation	MTC	$0	$865,000
TOC Policy Implementation	MTC	$0	$400,000
Transit Oriented Communities (TOC) Planning and Rezoning			
Alameda County CDA: TOC Planning and Rezoning	MTC	$1,000,000	
Antioch: TOC Planning and Rezoning	MTC	$650,000	
Concord: TOC Planning and Rezoning	MTC	$185,000	
El Cerrito: TOC Planning and Rezoning	MTC	$270,000	
Pittsburg: TOC Planning and Rezoning	MTC	$250,000	
Colma: TOC Planning and Rezoning	MTC	$100,000	
Redwood City: TOC Planning and Rezoning	MTC	$350,000	
San Bruno: TOC Planning and Rezoning	MTC	$300,000	
San Mateo City: TOC Planning and Rezoning	MTC	$610,000	

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OBAG 3 REGIONAL PROGRAMS		**$339,075,000**	**$115,990,000**
South San Francisco: TOC Planning and Rezoning	MTC	$250,000	
Milpitas: TOC Planning and Rezoning	MTC	$100,000	
Morgan Hill: TOC Planning and Rezoning	MTC	$650,000	
San José: TOC Planning and Rezoning	MTC	$1,200,000	
Santa Clara City: TOC Planning and Rezoning	MTC	$250,000	
Healdsburg: TOC Planning and Rezoning	MTC	$1,130,000	
Petaluma: TOC Planning and Rezoning	MTC	$1,000,000	
Santa Rosa: TOC Planning and Rezoning	MTC	$300,000	
Sonoma County: TOC Planning and Rezoning	MTC	$200,000	
Windsor: TOC Planning and Rezoning	MTC	$650,000	
2. GROWTH FRAMEWORK IMPLEMENTATION		**$21,380,000**	**$10,715,000**
3. CLIMATE, CONSERVATION, AND RESILIENCE			
Climate Initiatives			
Mobility Hubs			
Mobility Hubs Capital Grants - Balance	TBD	$61,000	$0
Dublin/Pleasanton Access and Station Area Improvements	BART	$0	$3,000,000
Union City Intermodal Station Mobility Hub at Union City BART	Union City	$0	$2,259,000
Contra Costa College (CCC) Mobility Hub	San Pablo	$0	$2,950,000
Martinez Amtrak Station Shared Mobility Hub	CCTA	$0	$3,000,000
Walnut Creek BART Station Shared Mobility Hub	CCTA	$0	$3,343,000
Daly City BART Station Mobility Hub	BART	$3,776,000	
San Fernando Street Small-Scale Mobility Hubs	San Jose	$0	$1,140,000
VTA Blossom Hill Light Rail Station Mixed-Use Housing & Mobility Hub	VTA	$42,000	$4,758,000
Mobility Hubs Planning Grants			
Alameda County CDA: TOC Station Access and Circulation Planning	MTC	$400,000	
Berkeley/BART: TOC Station Access and Circulation Planning	MTC	$400,000	
Pleasanton: TOC Station Access and Circulation Planning	MTC	$150,000	
San Leandro: TOC Station Access and Circulation Planning	MTC	$265,000	
Antioch: TOC Station Access and Circulation Planning	MTC	$100,000	
Contra Costa County: TOC Station Access and Circulation Planning	MTC	$400,000	
ECCTA: Antioch Park n Ride Mobility Hub Plan	MTC	$400,000	
Lafayette: TOC Station Access and Circulation Planning	MTC	$350,000	
TAM: Marin County Mobility Hub Plan	MTC	$400,000	
SFMTA: Southeastern SF Mobility Hub Plan	MTC	$396,000	
Menlo Park: TOC Station Access and Circulation Planning	MTC	$400,000	
Morgan Hill: TOC Station Access and Circulation Planning	MTC	$175,000	
San José: TOC Station Access and Circulation Planning	MTC	$400,000	
Santa Clara City: TOC Station Access and Circulation Planning	MTC	$400,000	
Petaluma: TOC Station Access and Circulation Planning	MTC	$190,000	
Windsor: TOC Station Access and Circulation Planning	MTC	$200,000	
Mobility Hubs and Parking Management Technical Assistance	MTC	$572,000	
Bikeshare			
Electric Bikeshare: Bay Wheels Bikeshare E-bike Expansion - Berkeley, Emeryville, Oakland, San Francisco, San Jose **(Revised)**	MTC	**$0**	$15,940,000
Adaptive Bikeshare Pilot - Berkeley, Emeryville, Oakland, San Jose	MTC	$0	$100,000
Adaptive Bikeshare Pilot - San Francisco	MTC	$0	$100,000
Bay Wheels Bikeshare Expansion - Daly City	MTC	$0	$1,250,000
Bay Wheels Procurement Strategy	MTC	$500,000	
Bikeshare Outreach	MTC	$300,000	
~~**Bikeshare Station Electrification**~~ **(Removed)**	~~**MTC**~~	~~**$0**~~	~~**$560,000**~~
Bikeshare Station Siting - Oakland	MTC	$0	$150,000
Marketing for Bikeshare E-bike Expansion Launch	MTC	$0	$150,000
Membership Incentives for Bikeshare E-bike Expansion Launch	MTC	$0	$200,000
Bay Wheels Contract Extension (Added)	**MTC**	**$0**	**$2,410,000**
Transportation Electrification			
Charging Infrastructure: Regional Technical Assistance Program			
Alameda Public EV Charging Program	Alameda	$0	$1,237,000

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OBAG 3 REGIONAL PROGRAMS		**$339,075,000**	**$115,990,000**
Expanding Electric Vehicle Charging	Pinole	$0	$952,000
Southern Marin Vehicle Charging Consortium (SMVCC)	Mill Valley	$0	$1,351,000
Equity Focused EV Charging in Downtown Napa	Napa	$0	$974,000
Expanding Charging Access in San Francisco's EPCs	SFMTA	$0	$2,254,000
San Mateo County Regional EV Charging	East Palo Alto	$0	$581,000
San Mateo County Regional EV Charging	Half Moon Bay	$0	$829,000
Long Term EV Charging Infrastructure	Menlo Park	$0	$2,297,000
San Mateo County Regional EV Charging	Portola Valley	$0	$317,000
San Mateo County Regional EV Charging	San Carlos	$0	$523,000
Gilroy Public Library EV Chargers	Gilroy	$0	$527,000
Transit Hub Charging Stations	Morgan Hill	$0	$1,052,000
Palo Alto School-Community Partnership EV Charging Infrastructure	Palo Alto	$0	$2,855,000
San José Community EV Charging Access	San Jose	$0	$2,495,000
County of Santa Clara TOC EV Charging	Santa Clara County	$0	$1,756,000
Solano 360 Mobility Hub	Solano County	$0	$250,000
Charging Infrastructure: Transit Station Public Charging Program			
Electric Vehicle Charging at BART Stations	BART	$0	$5,900,000
Richmond Ferry Terminal Charging Infrastructure	WETA	$0	$3,750,000
Suisun City EV Charging Station Installation	Suisun City	$0	$350,000
Local Public Fleet Electrification: Planning Assistance	MTC	$4,000,000	
Large (500+ Vehicle) Fleet Planning *BART, Berkeley, Marin County, San Francisco, Sonoma County*	MTC	$2,000,000	
Medium (100-500 Vehicle) Fleet Planning *Alameda, Oakland, San Leandro, Concord, El Cerrito, Novato, San Rafael, Napa, Napa County, San Mateo, South San Francisco, Benicia, Vacaville*	MTC	$2,600,000	
Small (<100 Vehicle) Fleet Planning *Dublin, Corte Madera, Fairfax, Mill Valley, San Anselmo, Sausalito, Tiburon, Calistoga, St. Helena, Yountville, Belmont, Half Moon Bay, Hillsborough, Dixon*	MTC	$1,400,000	
Planning & Program Strategy: Local Action Planning	MTC	$4,500,000	
Planning & Program Strategy: Regional Program Strategy	MTC	$500,000	
Parking Management			
Parking Management Capital			
Downtown Concord Parking Technology Innovation & Implementation	Concord	$500,000	
Sausalito Capital Parking Improvements	Sausalito	$500,000	
Park Napa	Napa	$500,000	
Advancing Curb Management Project	San Jose	$2,000,000	
Parking Management Planning			
Concord: Downtown Parking Technology Solutions Study	MTC	$110,000	
Lafayette: Downtown Lafayette Parking Mgmt Program	MTC	$170,000	
Walnut Creek: Downtown Curbside Management Plan	MTC	$195,000	
Sausalito: Sausalito Downtown Parking Study	MTC	$106,000	
Napa: Park Napa Plan	MTC	$315,000	
Menlo Park: Menlo Park Citywide Strategic Parking Plan	MTC	$125,000	
San Mateo: Citywide Parking Requirement Update	MTC	$200,000	
Redwood City: TOC Parking Management Planning	MTC	$300,000	
Milpitas: TOC Parking Management Planning	MTC	$300,000	
San José: TOC Parking Management Planning	MTC	$300,000	
Santa Clara City: TOC Parking Management Planning	MTC	$150,000	
Vallejo: Downtown/Waterfront Parking Mgmt Eval/Action Plan	MTC	$150,000	
Petaluma: Downtown Area Parking Management Plan	MTC	$100,000	
Santa Rosa: Downtown Parking, Curb Mgmt & Access Plan	MTC	$207,000	
Santa Rosa: TOC Parking Management Planning	MTC	$150,000	
Windsor: TOC Parking Management Planning	MTC	$150,000	
Regional Transportation Demand Management (TDM)			

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OBAG 3 REGIONAL PROGRAMS		**$339,075,000**	**$115,990,000**
Commuter Benefits Program	MTC	$8,400,000	
Commuter Benefits Program - Air District	BAAQMD	$1,600,000	
Regional Carpool/Vanpool Program	MTC	$3,400,000	
Bike to Work & Spare the Air Youth	MTC	$4,800,000	
511 Traveler Information Services	MTC	$14,000,000	
Regional TDM Strategy	MTC	$250,000	
Regional TDM Balance **(Revised)**	MTC	**$2,650,000**	
Priority Conservation Area (PCA) Grant Program			
PCA Program Implementation	MTC	$0	$1,600,000
PCA Call for Projects - Phase I			
CCRCD: Livestock Pond Restoration	MTC	$0	$280,000
EBRPD: Tidewater Expansion	MTC	$0	$1,000,000
Farm to Market Phase 4	Solano County	$750,000	
GGNPC: Bothin Marsh Evolving Shorelines	MTC	$0	$670,000
Napa Valley Vine Trail - Vista Carneros Segment	Napa County	$750,000	
NCRPOSD: Phinney Fee Acquisition	MTC	$0	$1,000,000
Coyote Valley Wildlife Connectivity Planning	POST/VTA	$250,000	$0
SCVHA: Richmond Ranch Acquisition	MTC	$0	$1,000,000
SCVOSA: Rancho Canada del Oro Bay Area Ridge Trail	MTC	$0	$250,000
Sonoma Schellville Trail Design	Sonoma County	$550,000	
Southeast Greenway	Santa Rosa	$750,000	
Santa Clara County: Upper Stevens Creek Trail	MTC	$0	$500,000
SFRPD: Visitacion Ave Bike/Ped Safety Improvements	MTC	$0	$750,000
Pacific Flyway Fund: Pacific Flyway Center - Walk in the Marsh	MTC	$0	$1,000,000
PCA Grant Program Balance	TBD	$8,000,000	
3. CLIMATE, CONSERVATION, AND RESILIENCE		**$77,955,000**	**$79,050,000**
4. COMPLETE STREETS AND COMMUNITY CHOICE			
Healthy, Safe, and Sustainable Streets			
Regional Vision Zero/Safety Program			
CCTA: Local Roadway Safety Plan Development	MTC	$630,000	
NVTA: Local Roadway Safety Plan Development	MTC	$250,000	
C/CAG: Local Roadway Safety Plan Development	MTC	$0	$400,000
Bay Area Vision Zero Data System (BayViz)	MTC	$760,000	$260,000
BayViz Non-Pavement Asset Data Collection	MTC	$1,000,000	
Data Driven Safety Campaign	San Jose	$1,700,000	
Enhancing Support for Safety in the Bay Area (SS4A Match)	MTC	$0	$2,000,000
Vision Zero Working Group Peer Exchanges	MTC	$500,000	
Vision Zero Working Group Workshops	MTC	$500,000	
Regional Pavement & Asset Management Program		$0	
Pavement Technical Assistance Program (PTAP)	MTC	$10,000,000	
Pavement Management Program (PMP)	MTC	$1,000,000	$2,000,000
CEAC: Statewide Local Streets and Roads Needs Assessment	MTC	$0	$315,000
Regional Active Transportation Plan (AT Plan) Implementation			
Active Transportation Technical Assistance Program			
Active Transportation Program (ATP) Application Assistance	MTC	$0	$300,000
Active Transportation Technical Assistance Implementation	MTC	$0	$90,000
Active Transportation Workshops	MTC	$1,000,000	
Alameda: Willie Stargell Ave Safety Improvements Project	MTC	$0	$300,000
Albany: Pierce-Cleveland Bikeway Connection Project	MTC	$0	$300,000
BART: Coliseum BART Bike/Ped Preferred Path of Travel Improvements	MTC	$0	$300,000
Colma: El Camino Real Bike/Ped Improvement (Segment A)	MTC	$0	$300,000
El Cerrito: BART to Bay Trail Connector	MTC	$0	$40,000
El Cerrito: South El Cerrito Safe Routes to School	MTC	$0	$40,000
Lafayette: EBMUD Aqueduct Pathway	MTC	$0	$300,000
Mountain View: Evelyn Avenue Bikeway, Franklin to Bernardo	MTC	$0	$40,000
Napa Valley Vine Trail Coalition: NVVT Gap Closure North to S Napa County	MTC	$0	$40,000
Oakland: Doolittle Drive Bay Trail Gap Closure	MTC	$0	$40,000

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OBAG 3 REGIONAL PROGRAMS		**$339,075,000**	**$115,990,000**
Oakland: Fruitvale Connections	MTC	$0	$300,000
Orinda: Wilder/Downtown Class 1 Multi-use Path Development Project	MTC	$0	$40,000
Petaluma: Lakeville Corridor Multi-Modal Improvements Study	MTC	$0	$40,000
Pleasant Hill: Monument Boulevard Active Transportation Corridor	MTC	$0	$40,000
Richmond: Richmond Wellness Trail	MTC	$0	$150,000
SCTA/Rohnert Park: Hwy 101 Bike/Ped Overcrossing at Copeland Creek	MTC	$0	$40,000
San Bruno: San Bruno Avenue Complete Streets Project	MTC	$0	$40,000
San Jose: Quick Build Delineators to Complete 11 Class IV Bikeways	MTC	$0	$200,000
San Leandro: Hesperian Boulevard Bike Lane Gap Closure	MTC	$0	$100,000
San Mateo County: Midcoast Multimodal Parallel Trail Gap Closure	MTC	$0	$40,000
Santa Clara: De La Cruz Blvd, Lick Mill Blvd, and Scott Blvd Bike Projects	MTC	$0	$40,000
Santa Clara County: San Tomas Trail Extension	MTC	$0	$300,000
Santa Rosa: Deployment of Quick Build Low-Stress Bicycle Facilities	MTC	$0	$200,000
SSF: Colma/SSF El Camino Real Bike/Ped Improvement (Segment C)	MTC	$0	$300,000
Union City: UC Blvd. Bay Trail Connect/ Ala Creek Trail to Dry Creek Park	MTC	$0	$40,000
Vallejo: Mare Island Causeway Complete Street	MTC	$0	$40,000
Bay Trail Planning	MTC	$1,150,000	$350,000
Bay Trail Implementation	MTC	$750,000	
Bay Trail Technical Assistance			
Oakland: Doolittle Drive Bay Trail Gap Closure	MTC	$0	$250,000
Bay Trail - Marshlands Road (Phase 1)	Fremont	$1,500,000	
Bay Skyway: West Oakland Link	MTC	$1,900,000	
SFMTA Light Rail Vehicles (for YBI MUP and Related Roadway Imps)	SFMTA	$4,100,000	
Community Choice			
Community-Based Transportation Plans (CBTPs)			
ACTC: Community-Based Transportation Plans	MTC	$600,000	
CCTA: Community-Based Transportation Plans	MTC	$450,000	
TAM: Community-Based Transportation Plans	MTC	$300,000	
NVTA: Community-Based Transportation Plans	MTC	$150,000	
SFCTA: Community-Based Transportation Plans	MTC	$0	$370,000
C/CAG: Community-Based Transportation Plans	MTC	$0	$245,000
VTA: Community-Based Transportation Plans	MTC	$0	$600,000
STA: Community-Based Transportation Plans	MTC	$0	$190,000
SCTA: Community-Based Transportation Plans	MTC	$0	$245,000
Community Action Resource and Empowerment (CARE) Program			
CARE Power-Building and Engagement	MTC	$0	$2,000,000
United Seniors of Oakland Alameda County: Peer to Peer Senior Mobility	MTC	$0	$50,000
Climate Resilient Communities: Capacity Building for Housing Equity in San Mateo County	MTC	$0	$50,000
Latina Coalition of Silicon Valley: Latina Leaders for Housing and Mobility Justice	MTC	$0	$50,000
Youth Leadership Institute: Justice Grows Here - Coastside Leadership Academy	MTC	$0	$50,000
East Contra Costa Community Alliance: Leadership Academy for Community Action	MTC	$0	$100,000
Fair Housing Advocates Northern CA: North Bay Housing Access Partnership Initiative	MTC	$0	$100,000
EBHO: Affirmatively Further Fair Housing - Local Context and Regional Application	MTC	$0	$100,000
BORP: Adaptive Micromobility Program	MTC	$0	$200,000
Bonafide: Transit to Belonging - Reentry Access and Mobility	MTC	$0	$200,000
One Treasure Island: Community Mobility Pilot	MTC	$0	$100,000
CARE CBTP Technical Assistance Implementation	MTC	$0	$12,000,000
4. COMPLETE STREETS AND COMMUNITY CHOICE		**$28,240,000**	**$26,225,000**
5. MULTIMODAL SYSTEMS OPERATIONS AND PERFORMANCE			
Transit Transformation Action Plan			
Transit Priority - Highway Investments			
Bay Bridge Forward: I-80 HOV Lane Access Restrictions	MTC	$4,600,000	
Bay Bridge Forward: I-80, SFOBB, & Carquinez Bridge HOV Hours of Operation	MTC	$3,050,000	
Smart Transbay Transit	MTC	$5,350,000	
Transit Priority - Bus Accelerated Infrastructure Delivery (BusAID)	TBD	$4,095,000	

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PROJECT CATEGORY AND TITLE	SPONSOR	Total STP/CMAQ	Total Other
OBAG 3 REGIONAL PROGRAMS		**$339,075,000**	**$115,990,000**
International Blvd Transit Lane Delineation	AC Transit	$3,906,000	
El Camino Real Bus Boarding Islands & Stop Balancing in Redwood City	SamTrans	$1,421,000	
El Camino Real - Fast Tracking Corridor-Wide Implementation	SamTrans	$2,000,000	
K-Ingleside Rapid Project Ocean Ave Quick-Build	SFMTA	$2,200,000	
Vision Zero E San Jose Safety Corridor Senter Rd Boarding Islands	San Jose	$4,028,000	
Innovative Deployments for Enhanced Arterials - Transit Signal Priority (IDEA TSP)			
CCTA: Innovate 680 - Coordinated Adaptive Traffic Signals (CATS)	MTC	$250,000	
TAM: Marin Countywide Coordinated Signal Modernization Plan	MTC	$500,000	
County Connection: Four Corridors TSP	MTC	$200,000	
SamTrans: Countywide TSP Program	MTC	$700,000	
City of San José: TSP Evaluation and Signal Retiming	MTC	$300,000	
Mapping & Wayfinding	MTC	$5,600,000	
Multimodal Systems Programs			
Clipper C2 Capital (Loan for RM3)	MTC	$30,000,000	
Forward Programs			
Bay Bridge Forward Preliminary Engineering	MTC	$4,000,000	
Bay Bridge Forward: I-580 WB to I-80 EB Connector Bus Lane	MTC	$3,600,000	
Bay Bridge Forward: I-80 EB HOV Connector Bus on Shoulder	MTC	$3,600,000	
Bay Bridge Forward: I-80 HOV Lane Access Restrictions	MTC	$4,300,000	
Bay Bridge Forward: I-80 Localized Transit Priority/HOV Strategies	MTC	$6,300,000	
Bay Bridge Forward: I-80/Powell I/C Transit Access	MTC	$1,200,000	
Resilient SR 37	MTC	$10,000,000	
Design Alternative Assessments/Corridor Studies	MTC	$4,000,000	
Adaptive Ramp Metering Implementation			
Adaptive Ramp Metering on I-680 in Contra Costa County	MTC	$2,000,000	
Adaptive Ramp Metering on I-80 in Solano County	MTC	$1,000,000	
Adaptive Ramp Metering on SR 4 in Contra Costa County	MTC	$1,000,000	
Adaptive Ramp Metering on SR 237 in Santa Clara County	MTC	$1,000,000	
Adaptive Ramp Metering on US 101 in Marin and Sonoma Counties	MTC	$1,000,000	
Optimized Freeway Corridor Operations	MTC	$3,000,000	
US 101 Optimized Corridor Operations in Santa Clara and San Mateo Counties	MTC	$3,000,000	
Multimodal Arterial Operations	MTC	$6,500,000	
Shared Connected/Automated Vehicles and Technology	MTC	$1,000,000	
Regional ITS Architecture	MTC	$2,000,000	
Regional Communications Infrastructure Upgrade	MTC	$23,300,000	
Incident Management	MTC	$4,000,000	
SR 29 American Canyon Operational and Multimodal Imps	NVTA	$1,000,000	
SamTrans Preventative Maintenance (for SamTrans ROW Repayment)	SamTrans	$7,000,000	
5. MULTIMODAL SYSTEMS OPERATIONS AND PERFORMANCE		**$162,000,000**	**$0**
OBAG 3 REGIONAL PROGRAMS	**TOTAL:**	**$339,075,000**	**$115,990,000**

Date: February 23, 2011
W.I.: 1512
Referred by: PAC
Revised: 10/26/11-C 02/26/14-C 12/21/16-C
07/26/17-C 02/28/18-C 03/28/18-C
11/28/18-C 03/27/19-C 06/26/19-C
09/25/19-C 11/20/19-C 03/25/20-C
11/20/20-C 05/26/21-C 06/23/21-C
07/28/21-C 03/23/22-C 06/22/22-C
03/22/23-C 05/24/23-C 10/25/23-C
11/15/23-C 12/20/23-C 02/28/24-C
03/27/24-C 05/22/24-C 06/26/24-C
05/24/24-C 07/24/24-C 09/25/24-C
11/20/24-C 01/22/25-C 02/26/25-C
03/26/25-C 06/25/25-C 09/24/25-C
10/22/25-C 11/19/25-C 12/17/25-C
01/28/26-C 02/25/26-C 03/25/26-C

ABSTRACT

Resolution No. 3989, Revised

This resolution establishes the procedures governing the MTC Exchange Program. This resolution supersedes MTC Resolution No. 3018.

Attachment B was revised on October 26, 2011 to provide $376,000 in Exchange Program funding to the intertribal Electric Vehicle project.

Attachments B and C were respectively revised on February 26, 2014 to include $10 million in Exchange Program funding for Transit Oriented Affordable Housing (TOAH), and update final balances of the initial STP Exchange Program (Resolution 3018) to reflect final project close out.

Attachments A and B were revised on December 21, 2016 to program $1.1 million to the Bay Bridge Forward Commuter Parking Initiative and update the name of the Transit Oriented Affordable Housing Program.

Attachments A and B were revised on July 26, 2017 to program $8.2 million to the Regional Priority Conservation Area (PCA) program and $2.8 million to the Regional Active Operational Management Program. An additional $1 million in exchange funds will be committed to a specific project or program through a future Commission action. This action and associated agreement and programming actions are contingent upon California Transportation Commission (CTC) approval of the amendment to the baseline agreement for the Marin Sonoma Narrows project to accept STP/CMAQ funds rather than local funds.

Attachment B was revised on February 28, 2018 to program $10 million to the Bay Area Preservation Pilot; $1,024,000 to Richmond's Bike Share Capital and Outreach project; $826,000 for the joint Transportation Authority of Marin/Sonoma County Transportation Authority (TAM/SCTA) Bike Share Capital and Outreach project along the SMART Corridor; and redirect $2,800,000 from Regional Active Operational Management to the Bay Bridge Forward Commuter Parking Initiative project.

Attachment B was revised on March 28, 2018 to program $30,000 to the Bay Area Greenprint Priority Conservation Area (PCA) Improvements.

Attachments A and B were revised on November 28, 2018 to add the SCVTA SR 85 Transit Guideway Study and the CCTA I-680 NB HOV/Express Lane exchange agreements, and to program $4,000,000 in Exchange funds to the following projects: $619,000 to CCTA for Innovative Deployment for Enhanced Arterials; $621,000 to the city of Walnut Creek for innovative Deployment for Enhanced Arterials; $500,000 to the city of Richmond for the Richmond-San Rafael Bridge Bikeway Access; $1,160,000 to MTC for Richmond-San Rafael Bridge Forward; and $1,100,000 to MTC for Napa Valley Transportation Demand Management Strategies.

Attachment B was revised on March 27, 2019 to change the recipient of the Concord IDEA project from CCTA to the City of Concord and reduce the funding from $619,000 to $589,000; and reduce the funding amount for the MTC Richmond-San Rafael Bridge Forward project from $1,160,000 to $1,046,000; and redirect these funds to a new project with MTC as the recipient for the Concord IDEA project for $144,000. The matching funds for the Concord IDEA project as identified in MTC Resolution 4357, are included within the $144,000 amount. These changes result in no net change to total funds committed to-date.

Attachment A was revised on June 26, 2019 to cancel the $1,200,000 exchange agreement with the SCVTA for the SR 85 Transit Guideway Study as the funds provided through the exchange are no longer needed.

Attachment B was revised on September 25, 2019 to reflect MTC as the direct recipient of exchange funds for the Concord and Walnut Creek IDEA projects; funds will be provided on a reimbursement basis to each project sponsor pursuant to their respective funding agreements with MTC.

Attachment B was revised on November 20, 2019 to program $6,023,000 to 13 projects as part of the Priority Conservation Area (PCA) Grant program; funds will be provided on a reimbursement basis to each project sponsor pursuant to their respective funding agreements with MTC.

Attachment B was revised on March 25, 2020 to redirect $25,000 from MTC's Bay Bridge Forward Commuter Parking Initiative to MTC's Fruitvale Quick Build project.

Attachment B was revised on November 20, 2020 to program $647,000 to four projects as part of the Priority Conservation Area (PCA) Grant program. For the Yerba Buena Island Multi-Use Pathway, which provides access to the San Francisco-Oakland Bay Bridge, $1 million of federal OBAG 2 funds are being provided at this time for cash flow purposes. The Bay Area Toll Authority will repay non-federal funds to the MTC Exchange Program within three years. MTC's funds for the Twin Peaks trail will be provided to the Coastal Conservancy for management of the two fund sources for this project. Because the Conservancy is a state entity, the funds will be provided as an up-front grant rather than on a reimbursement basis. Funds for projects other than the Twin Peaks Trail will be provided on a reimbursement basis to each project sponsor pursuant to their respective funding agreements with MTC.

Attachment A was revised on May 26, 2021 to add the Transportation Authority of Marin's (TAM's) US 101 Marin-Sonoma Narrows (MSN) High-Occupancy Vehicle (HOV) Lanes project for $75,651,097.

Attachment A was revised on June 23, 2021 to add the Solano Transportation Authority's (STA's) Solano I-80 Managed Lanes project for $63,464,510.

Attachment A was revised on July 28, 2021 to add the Solano Transportation Authority's (STA's) Solano I-80 Managed Lanes project for $1,845,000, and to add the Bay Area Infrastructure Financing Authority's (BAIFA's) Solano I-80 Managed Lanes Toll System project for $2,822,000.

Attachment A and B were revised on March 23, 2022 to add the $500,000 exchange agreement with Midpeninsula Regional Open Space District for programming an equal amount of federal funds to VTA's Highway 17 Bicycle/Pedestrian Trail and Wildlife Crossing project; and to remove the $251,000 funding commitment for Albany's Albany Hill Access Improvements project, as the sponsor will not be moving forward with the project scope as originally proposed.
Attachment A was revised June 22, 2022 to add the Capitol Corridor Joint Powers Authority's (CCJPA's) State Route 84 Ardenwood Intermodal Bus Facility project for $100,000, as part of a fund exchange agreement with CCJPA.

Attachment B was revised on March 22, 2023 to program $15,940,000 to MTC for Bay Wheels Bikeshare E-bike Expansion.

Attachment B was revised on May 24, 2023 to reprogram $5,000,000 from MTC's Transit Oriented Affordable Housing (TOAH) program to MTC's Bay Area Housing Finance Authority (BAHFA): Senior Rental Assistance Pilot Program.

Attachment B was revised on October 25, 2023 to program $2,250,000 to MTC's Priority Production Area Pilot Program, $1,500,000 to MTC's Community Engagement and Capacity-Building project,

and $600,000 to MTC for station siting, marketing, and incentives in support of the Bay Wheels Bikeshare E-bike Expansion project.

Attachment B was revised on November 15, 2023 to program $1,500,000 to MTC for Priority Conservation Area (PCA) Grant Implementation.

Attachment B was revised on December 20, 2023 to program $560,000 to MTC for various projects in the Regional Active Transportation Technical Assistance Program.

Attachment B was revised on February 28, 2024 to revise the project name for the City of Rohnert Park's Regional Active Transportation Technical Assistance grant for Highway 101 Bicycle/Pedestrian Overcrossing at Copeland Creek to include Sonoma County Transportation Authority (SCTA) as a co-sponsor.

Attachment B was revised on March 27, 2024 to program $2,000,000 to MTC for the Enhancing Support for Safety in the Bay Area project, $2,000,000 to MTC for Pavement Management Program (PMP) Pavement Asset Data Collection Updates, $400,000 to MTC for two projects in the Regional Active Transportation Technical Assistance Program, and $80,000 to MTC for the Bay Area Vision Zero Data System.

Attachments A and B were revised on May 22, 2023 to add the $30,000,000 exchange agreement with MTC for programming an equal amount of federal funds to MTC's Next-Generation Clipper (C2) Capital project, as part of a Regional Measure 3 (RM3) loan arrangement, and program $350,000 to MTC for Bay Trail Implementation.

Attachment B was revised on June 26, 2024 to program $5,000,000 the Bay Area Housing Finance Authority (BAHFA) for county election cost reimbursement related to the 2024 regional housing bond measure, contingent upon BAHFA's submission of a bond measure, final election costs, and approval of a funding agreement between MTC and BAHFA.

Attachment B was revised on July 24, 2024 to program $100,000 to MTC for adaptive bikeshare pilots in Berkeley, Emeryville, Oakland, and San Jose; program $100,000 to MTC for an adaptive bikeshare pilot in San Francisco ($100,000); and deprogram $100,000 from MTC's bikeshare station siting project in Berkeley, Emeryville, San Francisco, and San Jose.

Attachment B was revised on September 25, 2025 to program $1,250,000 to MTC for Bay Wheels bikeshare expansion in Daly City.

Attachment B was revised on November 20, 2024 to program $4,950,000 to various projects within the Priority Conservation Area (PCA) Program and revise the project name for Menlo Park's Bedwell Bayfront Park OBAG 2 PCA project.

Attachments B and C were revised on January 22, 2025 to deprogram $250,000 from MTC for the Peninsula Open Space Trust's (POST's) Coyote Valley Wildlife Connectivity Planning project, reduce MTC's TransLink project by $49,242 to reflect final actual project costs, and revise the sponsor for the SMART Corridor Bikeshare Capital and Outreach project from the Transportation Authority of Marin (TAM) and Sonoma County Transportation Authority (SCTA) to MTC.

Attachment B was revised on March 26, 2025 to program $3,225,000 to MTC for various Transit Oriented Communities (TOC) housing policy development projects within the Regional Housing Technical Assistance program, program $2,740,000 to MTC for various Active Transportation Technical Assistance projects, program $750,000 to MTC for San Francisco Recreation and Parks' Visitacion Avenue Bicycle and Pedestrian Safety Improvements, and program $80,000 to MTC for Bay Area Vision Zero Data System (BayViz).

Attachment B was revised on June 25, 2025 to program $240,000 to MTC for Regional Housing Technical Assistance (RHTA) implementation and change the project name for MTC's TOC Housing Policy Development project in San Mateo County to reflect that the City of Belmont will be contracting with MTC on this project on behalf of multiple jurisdictions in the County.

Attachment B was revised on September 24, 2025 to reprogram $5,000,000 from the Bay Area Housing Finance Authority's (BAHFA's) Regional Housing Bond – County Election Cost Reimbursement project to MTC for BAHFA's Mixed-Income Loan Fund, program $1,000,000 to MTC for the Pacific Flyway Fund's Pacific Flyway Center – Walk in the Marsh project, program $250,000 to MTC for Oakland's Doolittle Drive Bay Trail Gap Closure project, program $100,000 to MTC for Priority Conservation (PCA) Program Implementation, deprogram $51,619 in project savings from MTC for Alameda County's Niles Canyon Road (Phase 1) project, and revise the program name for MTC's Bay Trail Implementation project to Bay Trail Planning.

Attachment B was revised on October 22, 2025 to program $560,000 to MTC's Bikeshare Station Electrification project.

Attachment B was revised on November 19, 2025 to program $315,000 to MTC for the 2026 Statewide Local Streets and Roads Needs Assessment.

Attachment B was revised on December 17, 2025 to program $1,500,000 to MTC for CARE Power Building and Engagement and update the name of the project.

Attachment B was revised on January 28, 2026 to program $1,000,000 in funds previously programmed to CARE Power Building and Engagement to specific projects.

Attachment B was revised on February 25, 2026 to program $12,000,000 to MTC for CARE CBTP Technical Assistance Implementation and $100,000 to MTC for the Bay Area Vision Zero Data System (BayViz).

Attachment B was revised on March 25, 2026 to program $2,410,000 to MTC for the Bay Wheels contract extension and deprogram $560,000 from MTC for Bikeshare Station Electrification.

Further discussions are contained in memorandums to the Programming and Allocations Committee dated February 9, 2011, October 12, 2011, February 12, 2014, December 14, 2016, July 12, 2017, February 14, 2018, March 7, 2018, November 14, 2018, March 6, 2019, June 12, 2019, September 4, 2019, November 8, 2019, March 11, 2020, November 4, 2020, May 12, 2021, June 9, 2021, July 14, 2021, March 9, 2022, June 8, 2022, and March 8, 2023; the Administration Committee dated May 10, 2023; the Programming and Allocations Committee dated October 11, 2023, November 8, 2023; the Planning Committee dated December 8, 2023; and the Programming and Allocations Committee dated December 13, 2023, February 14, 2024, March 13, 2024, May 8, 2024, June 12, 2024, July 10, 2024, September 11, 2024, November 13, 2024, January 8, 2025, March 12, 2025, June 11, 2025, September 10, 2025, October 8, 2025, November 12, 2025, December 10, 2025, January 14, 2026, February 11, 2026, and March 11, 2026.

Date: February 23, 2011
W.I.: 1512
Referred by: PAC

Re: MTC Exchange Program

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 3989

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to California Government Code Section 66500 et seq.; and

WHEREAS, MTC is the designated Metropolitan Planning Organization (MPO) for the nine-county San Francisco Bay Area region (the region) and is the recipient for various federal fund sources for the San Francisco Bay Area; and

WHEREAS, MTC develops policies and procedures to be used in the selection of projects to be funded with various federal fund sources within the region consistent with the regional Transportation Plan (RTP); and

WHEREAS, selected projects are sometimes incompatible with or ineligible for federal funding and projects are often ready for implementation in advance of funding availability; and

WHEREAS, MTC assisted the Santa Clara County Traffic Authority (SCCTA) in 1994 by providing Surface Transportation Program (STP) funds, which initiated the original Exchange program implemented through MTC Resolution 3018; and

WHEREAS, the original exchange funding under MTC Resolution 3018 is nearly exhausted and MTC has entered into new funding exchange agreements where the implementation of specific projects with federal funds in exchange for local funds can achieve regional goals and objectives; now, therefore, be it

RESOLVED that Attachments A and B reflect the Exchange program balance and agreements approved by the Commission subject to this resolution; and be it further

RESOLVED, that Attachment C lists the projects and amounts from the original STP Exchange program (MTC Resolution 3018) incorporated into the new MTC Exchange program; and be it further

RESOLVED that the Executive Director or designee is authorized to revise Attachments A, B and, C as necessary to reflect Commission actions and the on-going balances within the MTC Exchange program; and be it further

RESOLVED that MTC Resolution No. 3018 is superseded by this resolution.

METROPOLITAN TRANSPORTATION COMMISSION

_____

Scott Haggerty, Chair

This resolution was entered into by the
Metropolitan Transportation Commission at a
regular meeting of the Commission held in
Oakland, California on February 23, 2011.

MTC Exchange Program
Funding Commitments
Attachment B

Recipient	Project/Program	Res No.	Date	Committed by MTC
MTC	Transit Oriented Affordable Housing (TOAH)	3940, 4306	2/24/2010, 12/20/17	$5,000,000
MTC	BAHFA: Senior Rental Assistance Pilot Program	4578	5/24/2023	$5,000,000
SP Rancheria	Intertribal Electric Vehicle Implementation	3925	10/26/2011	$376,000
MTC	Affordable Housing Jumpstart	4260	12/21/2016	
MTC	Alameda Jumpstart	4260	11/28/2018	$2,000,000
MTC	San Francisco Jumpstart	4260	11/28/2018	$5,000,000
MTC	Santa Clara Jumpstart	4260	11/28/2018	$3,000,000
MTC	Bay Bridge Forward Commuter Parking Initiative	4035	12/21/2016	$3,875,000
MTC	Fruitvale Quick Build	4035	3/25/2020	$25,000
MTC	Regional Priority Conservation Area (PCA) Program (OBAG 2)	4202	7/26/2017	
MTC	Alameda County: Niles Canyon Trail, Phase 1	4202	11/20/2019	$269,381
MTC	Livermore: Arroyo Road Trail	4202	11/20/2019	$400,000
MTC	WOEIP/Urban Biofilter: Adapt Oakland Urban Greening in West Oakland	4202	11/20/2020	$300,000
MTC	EBRPD: Bay Trail at Point Molate (RSR Bridge to Point Molate Beach Park)	4202	11/20/2019	$1,000,000
MTC	JMLT: Pacheco Marsh/Lower Walnut Creek Restoration and Public Access	4202	11/20/2019	$950,000
MTC	San Francisco: McLaren Park and Neighborhood Connections Plan	4202	11/20/2019	$194,000
MTC	State Coastal Conservancy (for SF Rec & Park): Twin Peaks Trail Imps.	4202	11/20/2020	$74,000
MTC	GGNPC/NPS: Rancho Corral de Tierra Unit Management Plan Engagement	4202	11/20/2019	$200,000
MTC	Half Moon Bay: Pillar Point Public Access Improvements	4202	11/20/2019	$298,000
MTC	Menlo Park: Bedwell Bayfront Park Access Improvements	4202	11/20/2019	$520,000
MTC	San Mateo County: Colma Creek Adaptation Study	4202	11/20/2019	$110,000
MTC	San Mateo Co,: San Bruno Mtn. Habitat Conservation Plan Grazing Pilot	4202	11/20/2020	$137,900
MTC	South San Francisco: Sign Hill Conservation and Trail Master Plan	4202	11/20/2020	$135,100
MTC	Point Blue: Pajaro River Watershed Habitat Rest. & Climate Resilient Imps.	4202	11/20/2019	$379,000
MTC	SCVOSA: Coyote Ridge Open Space Preserve Public Access, Phase 1	4202	11/20/2019	$400,000
MTC	SCVOSA: Tilton Ranch Acquisition	4202	11/20/2019	$1,000,000
MTC	PCA Grant Implementation	4202	11/20/2019	$500,000
MTC	Bay Area Greenprint PCA Improvements	4202	3/28/2018	$30,000

MTC Exchange Program
Funding Commitments
Attachment B

Recipient	Project/Program	Res No.	Date	Committed by MTC
MTC	Regional Priority Conservation Area (PCA) Program (OBAG 3)	4505	11/15/2023	
MTC	CCRCD: Livestock Pond Restoration	4505	11/20/2024	$280,000
MTC	EBRPD: Tidewater Expansion	4505	11/20/2024	$1,000,000
MTC	GGNPC: Bothin Marsh Evolving Shorelines	4505	11/20/2024	$670,000
MTC	NCRPOSD: Phinney Fee Acquisition	4505	11/20/2024	$1,000,000
MTC	SCVHA: Richmond Ranch Acquisition	4505	11/20/2024	$1,000,000
MTC	SCVOSA: Rancho Canada del Oro Bay Area Ridge Trail	4505	11/20/2024	$250,000
MTC	Santa Clara County: Upper Stevens Creek Trail	4505	11/20/2024	$500,000
MTC	SFRPD: Visitacion Ave Bike/Ped Safety Improvements	4505	3/26/2025	$750,000
MTC	Pacific Flyway Fund: Pacific Flyway Center - Walk in the Marsh	4505	9/24/2025	$1,000,000
MTC	PCA Grant Implementation	4505	9/24/2025	$1,600,000
MTC	Priority Production Area (PPA) Pilot Program	4505	10/25/2023	
MTC	Benicia: Port of Benicia - Infras. & Facility Modernization Plan	4505	10/25/2023	$750,000
MTC	CC County: N Waterfront PPAs Technical Assistance Project	4505	10/25/2023	$500,000
MTC	East Bay Econ Dev Alliance: Next Gen East Bay Indust Bldgs/Districts	4505	10/25/2023	$500,000
MTC	STA: Aligning Middle Wage Jobs with Housing in Solano County	4505	10/25/2023	$500,000
MTC	TAM/SCTA: Bike Share Capital and Outreach - SMART Corridor	3925	2/28/2018	$826,000
Richmond	Bike Share Capital and Outreach - Richmond	3925	2/28/2018	$1,024,000
MTC	Bay Area Preservation Pilot (BAPP)	4311	2/28/2018	$10,000,000
MTC	IDEA - Concord: Concord Blvd, Clayton Rd & Willow Pass Rd	4202	11/28/2018	$589,000
MTC	IDEA - Walnut Creek: Various Locations	4202	11/28/2018	$621,000
Richmond	Richmond-San Rafael Bridge Bicycle Access	4202	11/28/2018	$500,000
MTC	Richmond-San Rafael Bridge Forward	4202	11/28/2018	$1,046,000
MTC	Napa Valley Transportation Demand Strategies	4202	11/28/2018	$1,100,000
MTC	IDEA - Concord Blvd, Clayton Rd & Willow Pass Rd	4202	3/27/2019	$144,000

MTC Exchange Program
Funding Commitments
Attachment B

Recipient	Project/Program	Res No.	Date	Committed by MTC
MTC	Bay Wheels Bikeshare Expansion	4505	10/25/2023	
MTC	Bay Wheels Bikeshare E-bike Expansion - Berkeley, Emeryville, Oakland, San Francisco, San Jose	4505	3/22/2023	$15,940,000
MTC	Adaptive Bikeshare Pilot - Berkeley, Emeryville, Oakland, San Jose	4505	7/24/2024	$100,000
MTC	Adaptive Bikeshare Pilot - San Francisco	4505	7/24/2024	$100,000
MTC	Bay Wheels Bikeshare Expansion - Daly City	4505	9/25/2024	$1,250,000
~~MTC~~	~~Bikeshare Station Electrification~~ (Removed)	~~4505~~	~~10/22/2025~~	~~$560,000~~
MTC	Bikeshare Station Siting - Oakland	4505	10/25/2023	$150,000
MTC	Marketing for Bikeshare E-bike Expansion Launch	4505	10/25/2023	$150,000
MTC	Membership Incentives for Bikeshare E-bike Expansion Launch	4505	10/25/2023	$200,000
MTC	Bay Wheels Contract Extension (Added)	4505	3/25/2026	$2,410,000
MTC	Regional Active Transportation Technical Assistance Program	4505	12/20/2023	
MTC	El Cerrito: BART to Bay Trail Connector	4505	12/20/2023	$40,000
MTC	El Cerrito: South El Cerrito Safe Routes to School	4505	12/20/2023	$40,000
MTC	Mountain View: Evelyn Avenue Bikeway, Franklin to Bernardo	4505	12/20/2023	$40,000
MTC	Napa Valley Vine Trail Coalition: NVVT Gap Closure North to S Napa County	4505	12/20/2023	$40,000
MTC	Oakland: Doolittle Drive Bay Trail Gap Closure	4505	12/20/2023	$40,000
MTC	Orinda: Wilder/Downtown Class 1 Multi-use Path Development Project	4505	12/20/2023	$40,000
MTC	Petaluma: Lakeville Corridor Multi-Modal Improvements Study	4505	12/20/2023	$40,000
MTC	Pleasant Hill: Monument Boulevard Active Transportation Corridor	4505	12/20/2023	$40,000
MTC	SCTA/Rohnert Park: Hwy 101 Bike/Ped Overcrossing at Copeland Creek	4505	12/20/2023	$40,000
MTC	San Bruno: San Bruno Avenue Complete Streets Project	4505	12/20/2023	$40,000
MTC	San Jose: Quick Build Delineators to Complete 11 Class IV Bikeways	4505	3/27/2024	$200,000
MTC	San Mateo County: Midcoast Multimodal Parallel Trail Gap Closure	4505	12/20/2023	$40,000
MTC	Santa Clara: De La Cruz Blvd, Lick Mill Blvd, and Scott Blvd Bike Projects	4505	12/20/2023	$40,000
MTC	Santa Rosa: Deployment of Quick Build Low-Stress Bicycle Facilities	4505	3/27/2024	$200,000
MTC	Union City: UC Blvd. Bay Trail Connect/ Ala Creek Trail to Dry Creek Park	4505	12/20/2023	$40,000
MTC	Vallejo: Mare Island Causeway Complete Street	4505	12/20/2023	$40,000
MTC	Alameda: Willie Stargell Ave Safety Improvements	4505	3/26/2025	$300,000
MTC	Albany: Pierce-Cleveland Bikeway Connection	4505	3/26/2025	$300,000
MTC	BART: Coliseum BART Bike/Ped Preferred Path of Travel Improvements	4505	3/26/2025	$300,000
MTC	Colma: El Camino Real Bike/Ped Improvement (Segment A)	4505	3/26/2025	$300,000

MTC Exchange Program
Funding Commitments
Attachment B

Recipient	Project/Program	Res No.	Date	Committed by MTC
MTC	Lafayette: EBMUD Aqueduct Pathway	4505	3/26/2025	$300,000

MTC Exchange Program
Funding Commitments
Attachment B

Recipient	Project/Program	Res No.	Date	Committed by MTC
MTC	Oakland: Fruitvale Connections	4505	3/26/2025	$300,000
MTC	Richmond: Richmond Wellness Trail	4505	3/26/2025	$150,000
MTC	San Leandro: Hesperian Boulevard Bike Lane Gap Closure	4505	3/26/2025	$100,000
MTC	Santa Clara County: San Tomas Trail Extension	4505	3/26/2025	$300,000
MTC	South San Francisco: Colma/SSF El Camino Real Bike/Ped Improvement (Segment C)	4505	3/26/2025	$300,000
MTC	Active Transportation Technical Assistance Implementation	4505	3/26/2025	$90,000
MTC	Community Action Resources and Empowerment (CARE) Program	4505	10/25/2023	
MTC	CARE Power-Building and Engagement	4505	10/25/2023 12/17/2025	$2,000,000
MTC	United Seniors of Oakland Alameda County: Peer to Peer Senior Mobility	4505	1/28/2026	$50,000
MTC	Climate Resilient Communities: Capacity Building for Housing Equity in San Mateo County	4505	1/28/2026	$50,000
MTC	Latina Coalition of Silicon Valley: Latina Leaders for Housing and Mobility Justice	4505	1/28/2026	$50,000
MTC	Youth Leadership Institute: Justice Grows Here - Coastside Leadership Academy	4505	1/28/2026	$50,000
MTC	East Contra Costa Community Alliance: Leadership Academy for Community Action	4505	1/28/2026	$100,000
MTC	Fair Housing Advocates Northern CA: North Bay Housing Access Partnership Initiative	4505	1/28/2026	$100,000
MTC	EBHO: Affirmatively Further Fair Housing - Local Context and Regional Application	4505	1/28/2026	$100,000
MTC	BORP: Adaptive Micromobility Program	4505	1/28/2026	$200,000
MTC	Bonafide: Transit to Belonging - Reentry Access and Mobility	4505	1/28/2026	$200,000
MTC	One Treasure Island: Community Mobility Pilot	4505	1/28/2026	$100,000
MTC	CARE CBTP Technical Assistance Implementation	4505	2/25/2026	$12,000,000
MTC	Pavement Management Program (PMP) Pavement Asset Data Collection Updates	4505	3/27/2024	$2,000,000
MTC	Enhancing Support for Safety in the Bay Area (SS4A Match)	4505	3/27/2024	$2,000,000
MTC	Bay Area Vision Zero Data System	4505	3/27/2024 3/26/2025	$260,000
MTC	Bay Trail Planning	4505	5/22/2024	$350,000
MTC	Oakland: Doolittle Drive Bay Trail Gap Closure	4505	9/24/2025	$250,000
MTC	BAHFA: Mixed-Income Loan Fund	4505	9/24/2025	$5,000,000
MTC	CEAC: Statewide Local Streets and Roads Needs Assessment	4505	11/19/2025	$315,000
MTC	Regional Housing Technical Assistance	4505	2/26/2025	
MTC	Alameda County: TOC Housing Policy Development	4505	3/26/2025	$400,000
MTC	Emeryville: TOC Housing Policy Development	4505	3/26/2025	$250,000
MTC	Marin County: TOC Housing Policy Development	4505	3/26/2025	$400,000
MTC	Menlo Park: TOC Housing Policy Development	4505	3/26/2025	$250,000
MTC	Belmont: TOC Housing Policy Development in San Mateo County	4505	3/26/2025	$500,000
MTC	Morgan Hill: TOC Housing Policy Development	4505	3/26/2025	$200,000

MTC Exchange Program
Funding Commitments
Attachment B

Recipient	Project/Program	Res No.	Date	Committed by MTC
MTC	Windsor: TOC Housing Policy Development	4505	3/26/2025	$200,000
MTC	RHTA Implementation	4505	3/26/2025	$865,000
MTC	TOC Policy Implementation	4505	3/26/2025	$400,000
			Total Committed:	**$109,963,381**

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0375, **Version:** 1

Subject:
MTC Resolution No. 4751. Authorization of MTC Operating Reserve Policy.

Presenter:
Grace Martinez

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

March 25, 2026 **Agenda Item 8a - 26-0375**

MTC Resolution No. 4751 – Authorization of MTC Operating Reserve Policy

Update to Commission

Subject:

Authorization of MTC Operating Reserve Policy updates based on comments received from Committee members during the March 11, 2026 Administration Committee meeting.

Background:

In response to direction given by Committee members, staff has updated the MTC Operating Reserve Policy to include the reporting of any usage of the reserve as highlighted in MTC Resolution No. 4751, Attachment A.

Recommendations:

Staff recommends that the Commission adopt MTC Resolution No. 4751, authorizing MTC Operating Reserve Policy

Attachments:

- MTC Resolution No. 4751 (with updated Attachment A)
- March 11, 2026 Administration Committee Summary Sheet

Andrew B. Fremier

Date: March 25, 2026
W.I.: N/A
Referred by: Commission

ABSTRACT

Resolution No. 4751

This resolution authorizes the establishment of an Operating Reserve Policy for the Metropolitan Transportation Commission (MTC).

The Operating Reserve Policy is intended to provide guidelines to establish reserve targets and ensure that sufficient financial resources are maintained for unforeseen expenditures and revenue shortfalls of MTC. The Policy defines the level of operating reserve, procedures for using and reporting of funds in the reserve, replenishment, and monitoring of the operating reserve.

Further discussion of this resolution is contained in the Executive Director's memoranda to the Administration Committee dated March 11, 2026.

Date: March 11, 2026
W.I.: N/A
Referred by: Commission

RE: Establishment of an Operating Reserve Policy.

METROPOLITAN TRANSPORTATION COMMISSION

RESOLUTION NO. 4751

WHEREAS, the Metropolitan Transportation Commission (MTC) is the Regional Transportation Planning Authority for the San Francisco Bay Area pursuant to Government Code§§ 66500 et seq.; and

WHEREAS, the MTC has the responsibility to ensure that sufficient financial resources are maintained for unanticipated expenditures or revenue shortfalls of MTC; now therefore, be it

RESOLVED, that MTC hereby adopts the Reserve Policy as set forth in Attachment A to this Resolution, attached hereto and incorporated herein as though set forth at length; and, be it further

RESOLVED, Attachment A shall be applicable to all funds delegated to MTC; and, be it further

RESOLVED, that MTC's Executive Director, Chief Financial Officer or designee, are directed to establish and maintain an operating reserve in conformance with said policy; and, be it further

RESOLVED, that this policy shall remain in effect unless modified by MTC; and, be it further

RESOLVED, that this Resolution shall take precedent over any prior MTC Resolutions to the extent that they may conflict herewith or with Attachment A.

METROPOLITAN TRANSPORTATION COMMISSION

Sue Noack Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a duly called and noticed meeting held in San Francisco, California and at other remote locations, on March 25, 2026.

MTC Resolution No. 4751

OPERATING RESERVE POLICY

I. PURPOSE

This Reserve Policy of the Metropolitan Transportation Commission ("MTC") is intended to provide guidelines to establish reserve targets and ensure that sufficient financial resources are maintained for unanticipated expenditures or revenue shortfalls of MTC. This policy is also intended to preserve flexibility throughout the fiscal year to make adjustments in funding for programs approved in connection with the annual operating and capital budgets.

II. OBJECTIVE

The primary objective of establishing and maintaining a Reserve Policy is for MTC to be in a strong financial position that will allow it to better weather negative economic and/or financial trends.

III. POLICY

Definitions:

"Fund Balance" is the difference between assets, liabilities and deferred balances of MTC (also referred to as "net position"). MTC's net position has three components:

- Net Investment in Capital Assets - consists of capital assets, net of accumulated depreciation, reduced by the outstanding balances of borrowings attributable to the acquisition, construction, or improvement of those assets.

- Restricted Fund Balance - these funds have constraints placed on their use externally by creditors, grantors, contributors, or laws/regulations and are not addressed in this policy due to the nature of their restrictions.

  Unrestricted Fund Balance - these funds (which will include Operating Reserve described below), are available for the ongoing operation of MTC and are subject to limitations defined by this Policy.

MTC intends to establish and maintain an operating reserve as described below:

Operating Reserve:

Minimum: MTC will endeavor to maintain a minimum of six months of budgeted operating expenditures, or 50%, in the unrestricted fund balance. For the first fiscal year that the Operating Reserve is established, the amount will be based on the budgeted operating expenditures, as

defined in Exhibit A, for that year. The unrestricted fund balance shall remain unspent and shall serve as the Operating Reserve in order to accommodate normal fluctuations in the timing of revenues and unforeseen operational costs. The Government Finance Officers Association best practice recommends a minimum of two months or 16.67%, reserve for available working capital. To the extent that Operating Reserve balances are budgeted in a given fiscal year such that the Operating Reserve balance would fall below this level or used in order to meet the needs of funding budgeted expenditures, Finance Department staff will work with MTC's Executive Team to consider budgeting for the replenishment of the Operating Reserve in the following fiscal year. Any use of the Operating Reserve shall be reported to the Commission with the following Monthly Financial Report.

IV. PROCEDURES

1. Available resources (as determined annually through the closing of the financial records and development of the next year's budget) will be used as a basis for funding the Operating Reserve targets. These available resources or available fund balances are generally one-time in nature as they are derived from one-time revenues or one-time expenditure savings. The Operating Reserve targets will be set annually based upon financial elements of the Annual Budget.

The annual calculation of the maximum reserve amount in the Operating Reserve is illustrated in Exhibit A.

2. An amount equal to six months of operating expenses, or 50% of annual operating expenditures, are expected to remain in the unassigned fund balance for the Operating Reserve.

3. Available fund balances in excess of the Operating Reserve amounts shall not be used for ongoing operating expenditures, unless (a) budgeted by the Board or (b) in order to meet the needs of funding budgeted expenditures that are unable to be funded through current revenue. In the event that there is a need to use such funds consistent with (b) above, Finance Department staff will work with the MTC Executive team to consider plans to address future operating and capital budget shortfalls.

4. Any use of the Operating Reserve shall be reported to the Commission through the next Monthly Financial Report following the usage of the Operating Reserve.

Exhibit A

Illustration of Minimum Amount in Operating Reserve Fund

METROPOLITAN TRANSPORTATION COMMISSION

FY 2025-26 OPERATING BUDGET EXPENDITURES

SUMMARY

BUDGETED OPERATING EXPENDITURES SUMMARY

		FY 2025-26
I. Salaries and Benefits	$	40,995,224
II. Travel and Training	$	1,729,400
III. Printing, Reproduction, and Graphics	$	174,500
IV. Computer Services	$	8,992,816
V. Commissioner Expense	$	150,000
VI. Advisory Committees	$	30,000
VII. General Operations	$	6,328,773
Subtotal of Operating Expenses Before Contractual Service	$	58,400,713
VIII. Contractual Services	$	17,716,127
Total Operating Expense	**$**	**76,116,840**
Minimum:	***$***	***38,058,420***

Metropolitan Transportation Commission
Administration Committee

March 11, 2026 **Agenda Item 3a-26-0090**

MTC Resolution No. 4751 – Authorization of MTC Operating Reserve Policy

Subject:

Staff requests that the Committee authorize the referral of MTC Resolution No. 4751, to the Commission for the authorization of the MTC Operating Reserve Policy.

Background:

As part of prudent fiscal management, the Operating Reserve Policy ("Policy") is intended to provide guidelines to establish reserve targets and ensure that sufficient financial resources are maintained for unforeseen expenditures and revenue shortfalls of MTC.

The Policy defines the level of operating reserve to be maintained in the unrestricted fund balance, a minimum of six months or 50% of budgeted operating expenditures. If the operating reserve balance falls below the minimum amount, Finance Department staff will work with MTC's Executive Team to consider budgeting for the replenishment of the operating reserve in the following year.

Issues:

None identified.

Recommendation:

Refer MTC Resolution No. 4751, to the Commission for reauthorization.

Attachments:

- MTC Resolution No. 4751
  - Operating Reserve Policy

Andrew B. Fremier

Date: March 25, 2026
W.I.: N/A
Referred by: Commission

ABSTRACT

Resolution No. 4751

This resolution authorizes the establishment of an Operating Reserve Policy for the Metropolitan Transportation Commission (MTC).

The Operating Reserve Policy is intended to provide guidelines to establish reserve targets and ensure that sufficient financial resources are maintained for unforeseen expenditures and revenue shortfalls of MTC. The Policy defines the level of operating reserve, procedures for using and reporting of funds in the reserve, replenishment, and monitoring of the operating reserve.

Further discussion of this resolution is contained in the Executive Director's memoranda to the Administration Committee dated March 11, 2026.

Date: March 11, 2026
W.I.: N/A
Referred by: Commission

RE: Establishment of an Operating Reserve Policy.

METROPOLITAN TRANSPORTATION COMMISSION

RESOLUTION NO. 4751

WHEREAS, the Metropolitan Transportation Commission (MTC) is the Regional Transportation Planning Authority for the San Francisco Bay Area pursuant to Government Code§§ 66500 et seq.; and

WHEREAS, the MTC has the responsibility to ensure that sufficient financial resources are maintained for unanticipated expenditures or revenue shortfalls of MTC; now therefore, be it

RESOLVED, that MTC hereby adopts the Reserve Policy as set forth in Attachment A to this Resolution, attached hereto and incorporated herein as though set forth at length; and, be it further

RESOLVED, Attachment A shall be applicable to all funds delegated to MTC; and, be it further

RESOLVED, that MTC's Executive Director, Chief Financial Officer or designee, are directed to establish and maintain an operating reserve in conformance with said policy; and, be it further

RESOLVED, that this policy shall remain in effect unless modified by MTC; and, be it further

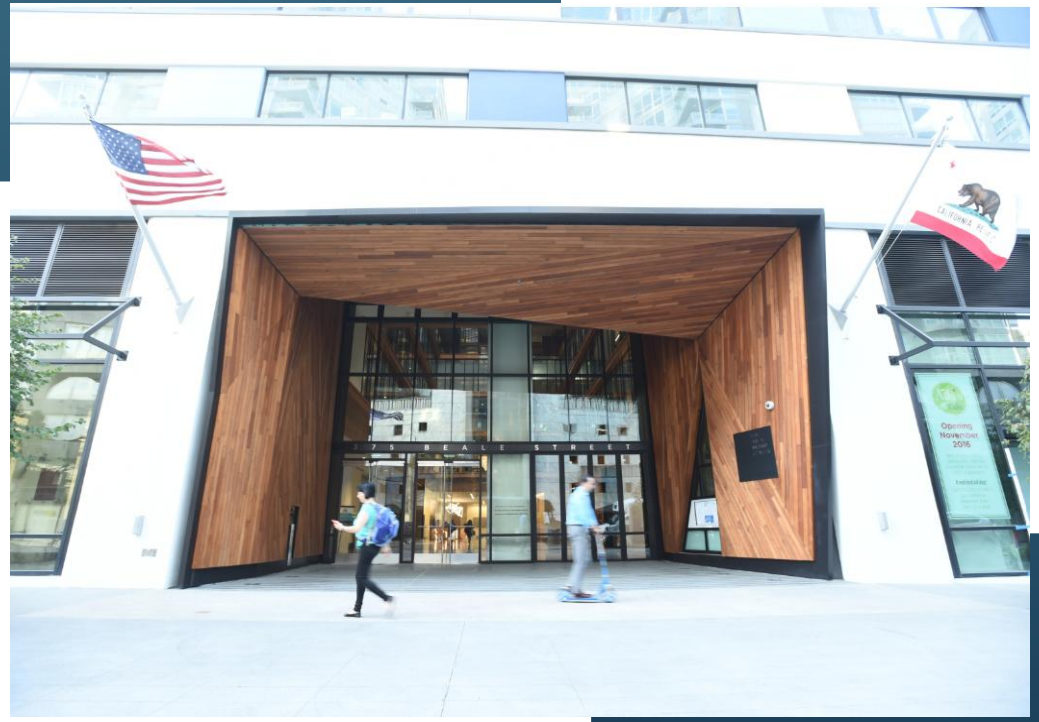
RESOLVED, that this Resolution shall take precedent over any prior MTC Resolutions to the extent that they may conflict herewith or with Attachment A.

METROPOLITAN TRANSPORTATION COMMISSION

Sue Noack Chair

The above resolution was entered into by the Metropolitan Transportation Commission at a duly called and noticed meeting held in San Francisco, California and at other remote locations, on March 25, 2026.

See updated MTC Resolution No. 4781 (Attachment A) attached to March 25, 2026 Summary Sheet update to Commission.

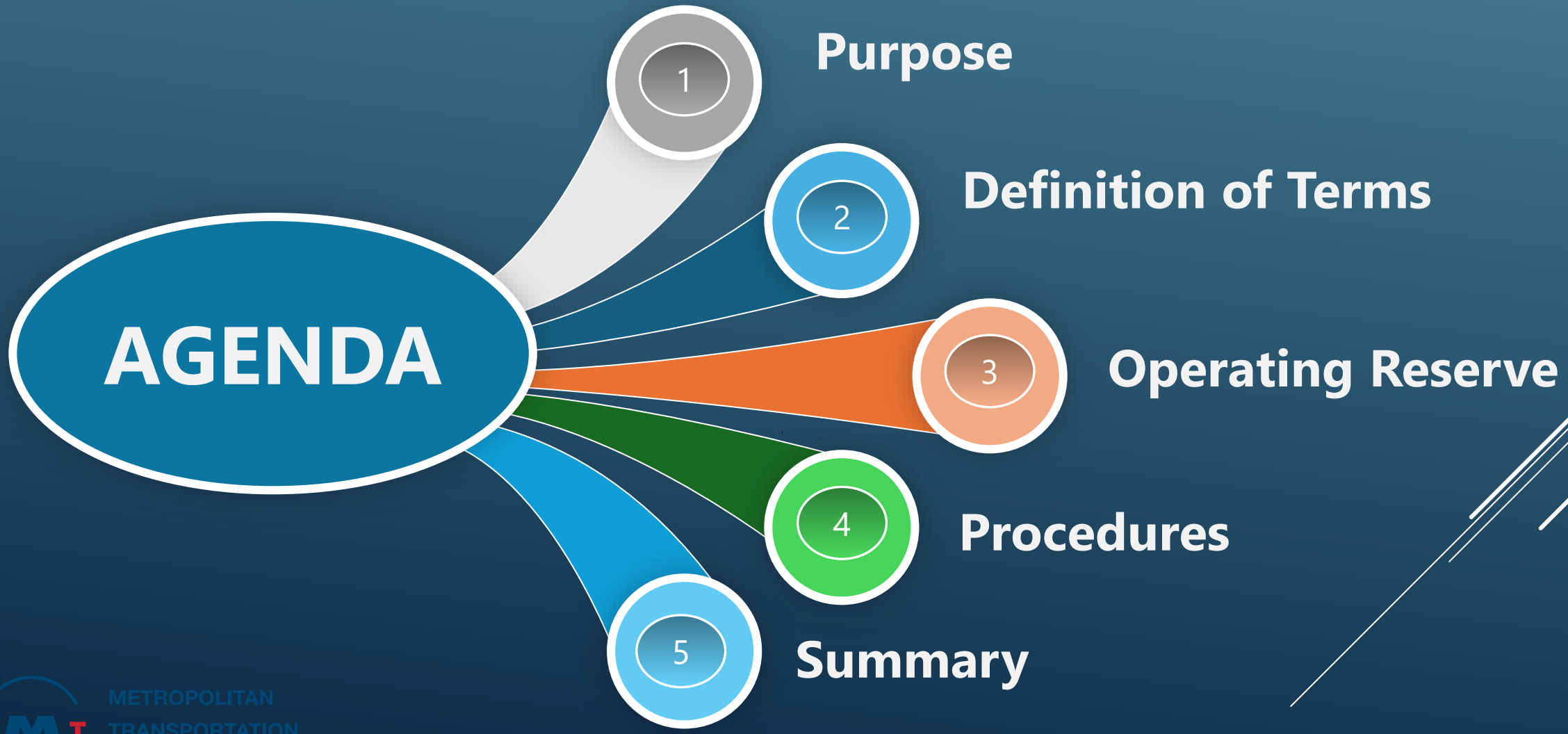


METROPOLITAN TRANSPORTATION COMMISSION

METROPOLITAN TRANSPORTATION COMMISSION OPERATING RESERVE POLICY

By: Grace Martinez, CPA
Director of Accounting

AGENDA



METROPOLITAN TRANSPORTATION COMMISSION

METROPOLITAN TRANSPORTATION COMMISSION

PURPOSE & OBJECTIVE

To provide guidelines to establish reserve targets.

Financial stability by mitigating current or future financial risks.

DEFINITION OF TERMS

Fund Balance Components:

-Net Investment in Capital Assets
-Restricted Fund Balance
-Unrestricted Fund Balance

Net Investment in Capital Assets

- Reflects the value of capital assets after depreciation.

Restricted

-Use have constraints place by external parties

(creditors, grantors, or laws/regulations)

Unrestricted

-Available for ongoing operations of MTC

METROPOLITAN TRANSPORTATION COMMISSION

RESERVE POLICY DETAILS

Minimum

MTC ensures financial stability by keeping at least six months of budgeted operating expenditures in reserve for emergencies.

Replenishment Procedures

Any use of the Operating Reserve requires immediate reporting and must be replenished in subsequent fiscal years for sustainability.

METROPOLITAN TRANSPORTATION COMMISSION

PROCEDURES & DATA

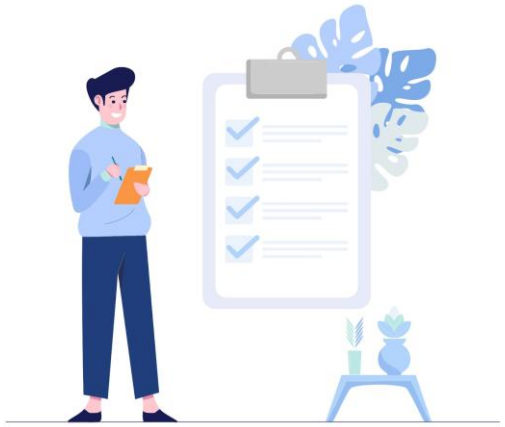
METROPOLITAN TRANSPORTATION COMMISSION
FY 2025-26 OPERATING BUDGET EXPENDITURES
CALCULATION OF MINIMUM RESERVE AMOUNT

	FY 2025-26
I. Salaries and Benefits	$ 40,995,224
II. Travel and Training	$ 1,729,400
III. Printing, Reproduction, and Graphics	$ 174,500
IV. Computer Services	$ 8,992,816
V. Commissioner Expense	$ 150,000
VI. Advisory Committees	$ 30,000
VII. General Operations	$ 6,328,773
Subtotal of Operating Expenses Before Contractual Service	$ 58,400,713
VIII. Contractual Services	$ 17,716,127
Total Operating Expense	**$ 76,116,840**

Minimum Reserve Amount at 50% of Annual Operating Expenditures:

$ 38,058,420

METROPOLITAN TRANSPORTATION COMMISSION



SUMMARY & KEYS TAKEAWAYS

- The Reserve Policy ensures financial stability for MTC during policy and economic fluctuations.
- Procedures in place guide the effective management of reserve funds.
- Annual calculations are crucial for aligning reserves with operating expenditures.

METROPOLITAN TRANSPORTATION COMMISSION

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0379, **Version:** 1

Subject:
MTC Resolution No. 4743. Adoption of the Fiscal Year 2025-26 Productivity Improvement Program (PIP).

Final update on operator progress toward Senate Bill 125 Regional Accountability Measures

Presenter:
Shruti Hari

Recommended Action:
Commission Approval

Metropolitan Transportation Commission
Programming and Allocations Committee

March 11, 2026 **Agenda Item 3a-26-0089**

MTC Resolution No. 4743

Subject:

Adoption of the Fiscal Year 2025-26 Productivity Improvement Program (PIP) and final update on operator progress toward Senate Bill 125 Regional Accountability Measures.

Senate Bill (SB) 125 Background

Amendments to the California State Budget Act of 2023 provided immediate transit operating assistance to help avert the near-term transit operating fiscal cliff that has resulted from the COVID-19 pandemic and associated changes in travel patterns. Based on adopted formulas, the Bay Area is expected to receive an estimated $400 million from the newly created Zero-Emission Transit Capital Program (ZETCP) and an additional $770 million from the Transit and Intercity Rail Capital Program (TIRCP) between FY 2023-24 and FY 2027-28. State action allows these funds to be used flexibly for capital or operating purposes, pursuant to Regional Transportation Planning Agency (RTPA) discretion. Consistent with prior MTC advocacy and supported by the possibility of leveraging between $6 and $8 billion in federal funds, a combined $665 million in TIRCP funds will support capital expenses related to BART to Silicon Valley Phase II and BART Core Capacity, resulting in $105 million in TIRCP and $400 million in ZETCP available for operating purposes.

Update on Funding for Fiscal Cliff Support

In December 2023, MTC submitted to the California State Transportation Agency (CalSTA) its SB 125 Short-Term Financial Plan, which demonstrated the plan to use SB 125 funds to address operating shortfalls and meet capital commitments. This plan included the use of $300 million in currently unassigned regional funds that can be made available as a one-time contribution to transit operations expenses.

In November 2024, the Commission approved the regional funding framework through the adoption of MTC Resolution No. 4619, Revised, assigning regional fund sources to operators. Regional revenues include those from the Surface Transportation Program/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ); Federal Transit Administration

Section 5307/5337 (Transit Capital Program); State Transit Assistance Population-Based Program (STA Regional Program); and Regional Measure 3 Operating Program funds for express bus service.

To date, MTC has received $728 million in SB 125 funds and has allocated all $535 million in SB 125 funds and $75 million in regional funds for FY 2024-25 and FY 2025-26 operating assistance and MTC planning and administration. These dollars support transit agencies' continued service provision, funding critical needs including operator salaries, fuel/energy, public safety/police services, and maintenance activities. SB 125 operating dollars do not fund operator capital commitments.

Near-term milestones related to SB 125 include MTC's receipt of the third tranche of SB 125 funds in spring 2026, coordinating with the recipients of SB 125 capital funds to establish an allocation timeline in summer 2026, and the completion of federal grants (TCP, STP/CMAQ) that are part of the regional funding contribution.

Regional Accountability Measures

MTC Resolution No. 4619, Revised, also establishes a set of Regional Accountability Measures including customer experience and efficiency enhancements that operators must advance to be eligible for SB 125 funding. For all operators receiving SB 125 funds, these requirements include participation in ongoing Transit Transformation Action Plan initiatives, and implementation of schedule coordination and real-time transit data improvements. Other accountability requirements are specific to individual operators and center around safety and security, fare evasion reduction, and comprehensive service improvements.

Summary of Final Progress for Operators Receiving SB 125 Funds

This item summarizes the final status of progress toward the SB 125 Regional Accountability Measures for Alameda-Contra Costa Transit District (AC Transit), San Francisco Bay Area Rapid Transit Authority (BART), Peninsula Corridor Joint Powers Board (Caltrain), Tri-Delta Transit (ECCTA), Golden Gate Bridge, Highway and Transportation District (Golden Gate Transit), Livermore Amador Valley Transit Authority (LAVTA), Napa Valley Transportation Authority (NVTA), San Joaquin Regional Rail Commission (SJRRC), San Francisco Municipal Transportation Agency (SFMTA), Solano County Transit (SolTrans), and Western Contra Costa

Transit Authority (WestCAT).

Summarized in greater detail in Attachment A, all operators have fulfilled the SB 125 Regional Accountability Measures. Notably, participation in regional initiatives remains strong, with all operators fulfilling the requirements identified by MTC. All applicable operators have shifted to the common operator sign-up schedule (January and August). All operators have completed the General Transit Feed Specification (GTFS) audit, with most operators meeting all basic best practices and all operators demonstrating planned implementation for the remaining best practices where feasible. Operators have also fulfilled the accountability measures for longer-term initiatives focused on fare collection, service optimization, ambassador programs, and crisis prevention.

Productivity Improvement Program

In accordance with Transportation Development Act (TDA) legislation, MTC annually adopts a Productivity Improvement Program (PIP), which is a set of projects to be undertaken by transit operators in the region in the near-term to improve productivity and lower operating costs. Before MTC can allocate TDA or State Transit Assistance (STA) funds to transit operators for Fiscal Year (FY) 2026-27, MTC must approve the FY 2025-26 PIP and affirm that operators have made a reasonable effort to implement their PIP project(s).

The PIP for the prior two fiscal years adopted the SB 125 Regional Accountability Measures as projects for operators receiving SB 125 funds. With the conclusion of the SB 125 operating program, the proposed PIP for FY 2025-26 returns to establishing PIP projects based on the recommendations from the most recent Triennial TDA Performance Audits conducted for each transit operator, as outlined in Public Utilities Code section 99244. This year's PIP includes productivity-related recommendations from the triennial audits conducted in FY 2023-24 and FY 2024-25. In addition, this year's PIP continues the "Participation in Regional Initiatives" project from the FY 2024-25 PIP, as detailed in Appendix 1 of the resolution attachment. This project will apply to all operators in the region, including those that did not have any recommendations in their most recent TDA audit.

In spring 2026, MTC is conducting a separate accountability effort for AC Transit, BART, Caltrain, and SFMTA, as required by Senate Bill (SB) 63. This first phase of the SB 63 Financial

Efficiency Review will summarize past cost-saving measures deployed by these four operators and identify early action strategies that would assist operators in improving rider outcomes and cost effectiveness moving forward. In order to streamline MTC's process for tracking progress and ensuring accountability, MTC plans to incorporate any productivity-related findings into the FY 2025-26 PIP for these four operators, in addition to the triennial audit PIP projects. MTC Resolution No. 4743 will be revised to include applicable recommendations from the Financial Efficiency Review after it has completed in summer 2026.

Next Steps

Operators will report on PIP progress in their submitted FY 2026-27 TDA/STA Transit Funding Application materials. MTC will assess operator compliance with PIP projects prior to allocating FY 2026-27 operating funds.

Issues:

None.

Recommendations:

Refer MTC Resolution No. 4743 to the Commission for approval.

Attachments:

- Attachment A – Senate Bill 125 Regional Accountability Progress Summary
- MTC Resolution No. 4743
    - Attachment A
        - Appendix 1
- Presentation

Andrew B. Fremier

Attachment A – Senate Bill 125 Regional Accountability Measure Progress Update for Claimant(s)

MTC Resolution No. 4619 identifies Regional Accountability Measures for operators receiving Senate Bill (SB) 125 funds. These measures have been identified as projects in MTC Resolution No. 4689, the Fiscal Year 2024-25 Productivity Improvement Program (PIP). In accordance with MTC's standard procedures, operators report on progress toward PIP projects when submitting their claims of transit operating funds on a rolling annual basis.

This document summarizes the progress made toward PIP projects for large operators that are due to receive SB 125 funds in either Fiscal Year 2024-25 or Fiscal Year 2025-26. Cells are color coded using the following schema:

Shading	Significance
Green	SB 125 Regional Accountability Measure has been fulfilled. Operator should maintain current performance moving forward
Yellow	SB 125 Regional Accountability Measure is in-progress and satisfactory progress has been made. Operator should continue to advance the initiative moving forward
Red	SB 125 Regional Accountability Measure is in-progress but satisfactory progress has not been made. Operator should act to significantly advance the initiative moving forward

AC Transit

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• AC Transit is currently participating in all applicable initiatives identified by MTC • Notably, AC Transit staff serve as co-project managers alongside MTC staff for several initiatives, including Transit 2050+ and Transit Priority work	• AC Transit has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• AC Transit is the project manager for the Bay Area Transit Reliability and Accessibility Network Scheduling Framework and Equitable Regional (TRANSFER) Plan, an effort to improve schedule coordination regionwide • The region implemented two rounds of schedule coordination changes including the "Big Sync" in August 2025, which reduced transfer wait times between bus and rail operators • As a result of negotiations with labor union partners that concluded in August 2025, AC Transit now has operator sign-ups in January, March, June, and August, which is consistent with the majority of operators in the region	• AC Transit has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• AC Transit is in compliance with all basic GTFS best practices and GTFS-Real Time best practices • AC Transit is in compliance with some but not all best practices that go beyond basic standards • AC Transit will implement the remaining best practices in 2026	• AC Transit has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that AC Transit continue toward implementation of the following technical revisions: o Revise stops.txt file to add tts_stop_name values o Revise pathways.txt file to provide

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
		complete wayfinding data
Report on Realign Service Planning Initiative	• The AC Transit Board of Directors voted to approve the Realign Final Network Plan in October 2024 • Realign service changes launched on August 10, 2025 • Staff will conduct performance updates through our existing Key Performance Indicators and regularly report on those	• AC Transit has fulfilled this SB 125 Regional Accountability Measure

BART

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• BART is currently participating in all applicable initiatives identified by MTC • Notably, BART staff and executives play a leadership role in several initiatives, including the Regional Network Management Council and Clipper BayPass	• BART has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• BART participates in the TRANSFER Plan working group • BART has shifted to January and August operator sign-ups, aligning with the regional standard • BART coordinates with connecting transit agencies roughly four months prior to every schedule change to promote efficient transfers • As part of the "Big Sync" effort in August 2025 to align schedules and improve transfers throughout the Bay Area, BART participated in regional schedule coordination meetings, made schedule changes, and worked with Caltrain to update the BART and Caltrain transfer timetables for Millbrae Station	• BART has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that BART continue to coordinate with connecting operators to more efficiently align schedules
General Transit Feed Specification (GTFS) Audit	• BART is in compliance with all basic GTFS best practices and all but one GTFS-Real Time best practice • BART is in compliance with some but not all best practices that go beyond basic standards • BART is assessing the implementation timeline for remaining best practices in FY 2026-27	• BART has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that BART continue toward implementation of the following technical revisions: ○ Provide Vehicle Positions in GTFS-RT feed

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
		○ Revise stops.txt file to provide accurate tts_stop_name values ○ Include Pathways data in GTFS feed ○ Perform real-time prediction accuracy monitoring
Implement New Fare Gates Systemwide	• In June 2025, the San Mateo County Transportation Authority awarded BART a $10.3 million Measure W Regional Transit Connections grant, completing the $90 million funding plan for the installation of next generation fare gates • As of August 27, BART has completed next generation fare gate installations at all 50 stations	• BART has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that BART continue to provide updates on incidence of fare evasion
Report on Ambassador Program	• Currently, BART employs 24 Crisis Intervention Specialists and 10 Ambassadors that circulate on trains and platforms • Key performance indicators (e.g., share of passengers that report having seen BART Police Department staff, BART Police Department response time to critical emergency calls) have improved in recent quarters • BART seeks to deploy additional resources and staffing so that there is optimal coverage on all lines or fixed areas of responsibility	• BART has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that BART continue to monitor the effectiveness of the ambassador program and implement improvements as necessary

Caltrain

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• Caltrain is currently participating in all applicable initiatives identified by MTC	• Caltrain has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• Caltrain has implemented coordinated schedule changes with the region starting in 2025 after the implementation of electrified service • As part of the "Big Sync" effort in August 2025, Caltrain participated in regional schedule coordination meetings (including Bay Area TRANSFER Plan efforts for the Palo Alto Caltrain station transfer hub) and worked with BART to update the BART and Caltrain transfer timetables for Millbrae Station • Caltrain is actively participating in the Bay Area TRANSFER Plan	• Caltrain has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that Caltrain continue to coordinate with connecting operators to more efficiently align schedules
General Transit Feed Specification (GTFS) Audit	• Caltrain is in compliance with all basic GTFS best practices • Caltrain does not currently provide a GTFS-RT feed, but it does provide real-time data to MTC. Caltrain is working with MTC staff to provide data in the GTFS-RT format • Caltrain is in compliance with some but not all best practices that go beyond basic standards • Caltrain has identified funds for an incremental Predictive Train Arrival/Departure System (PADS) Modernization Capital Improvement Project with a goal to provide a GTFS-RT directly out of the existing PADS system. The implementation date is to be determined.	• Caltrain has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that Caltrain continue toward implementation of the following technical revisions: o Provide real-time data in GTFS-RT as soon as possible o Include Pathways data in GTFS feed o Update GTFS-RT feed to represent canceled trips

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
		○ Implement Trip Updates and Vehicle Positions feeds to update every 20 seconds ○ Include unplanned or short-notice service changes in GTFS-RT feed unless an updated GTFS feed is disseminated in time for most trip planners
Report on Crisis Prevention Program	• Caltrain has deployed a safety, security, and crisis prevention program that leverages engineering, enforcement, and education • Caltrain contracts with the San Mateo County Sheriff's Department for a Transit Police Bureau with specialized training including crisis prevention • Caltrain deploys multiple suicide prevention tactics including barriers, signage, and crisis response drills with relevant partner agencies • Caltrain has replaced signage with 988 crisis hotline information along the entire corridor. • Caltrain hosts monthly meetings with regional suicide prevention groups and meetings with transit industry peers for crisis prevention best practices. • Caltrain actively works with MTC on regional emergency/crisis response plans. • Caltrain is exploring technologies in 2025, including AI, that may assist in early detection/prevention.	• Caltrain has fulfilled this SB 125 Regional Accountability Measure

Tri-Delta Transit (ECCTA)

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• ECCTA is currently participating in all applicable initiatives identified by MTC	• ECCTA has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• ECCTA has transitioned to operator sign-ups occurring in January and August • ECCTA works closely with BART on schedule coordination	• ECCTA has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• ECCTA is in compliance with all basic GTFS and GTFS-Real Time best practices • ECCTA is in compliance with some but not all best practices that go beyond basic standards	• ECCTA has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that ECCTA continue toward implementation of the following technical revisions: o Revise stops.txt file to provide accurate tts_stop_name and wheelchair_boarding values o Include Pathways data in GTFS feed o Provide complete GTFS-Flex data for all demand responsive routes

Golden Gate Transit

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• Golden Gate Transit is currently participating in all applicable initiatives identified by MTC • Two pilot locations for the Mapping and Wayfinding initiative are served by Golden Gate Transit, requiring close collaboration	• Golden Gate Transit has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• Golden Gate Transit has implemented coordinated operator sign-ups in January and August • Golden Gate Transit is actively participating in the Bay Area TRANSFER Plan and the MASCOTS Plan • Under MASCOTS, Golden Gate Transit will increase Route 101 service between San Rafael and San Francisco to every 15 minutes during the peak and every 30 minutes off-peak. This will improve transfer times compared to current connections between SMART and GGT • Golden Gate Transit's Board of Directors officially approved the MASCOTS service plan in September 2025	• Golden Gate Transit has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that Golden Gate Transit continue toward implementation of schedule improvements under the MASCOTS plan
General Transit Feed Specification (GTFS) Audit	• Golden Gate Transit is in compliance with basic GTFS and GTFS-Real Time best practices • Golden Gate Transit is in compliance with most but not all best practices that go beyond basic standards • Golden Gate Transit is currently assessing the technical requirements and cost to implement the remaining "beyond basic" GTFS standards	• Golden Gate Transit has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that Golden Gate Transit continue toward implementation of the following technical revisions: o Provide GTFS-RT Alerts feed for bus service

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
		○ Provide GTFS-RT data for ferry service ○ Revise stops.txt file to provide accurate wheelchair_boarding and tts_stop_name values ○ Revise trips.txt file to provide accurate information for wheelchair_accessible and bikes_allowed values
North Bay Transit Optimization Collaboration	• General Managers and Executive Directors from the Marin-Sonoma transit agencies and MTC executive staff have continued monthly convenings in 2025 • The MASCOTS finance group adopted a new Sonoma County performance-based fund allocation formula that mirrors that used in Marin County • The MASCOTS planning group has proposed significant regional service changes including discontinuation of Golden Gate Transit commuter service to Sonoma County • Golden Gate Transit completed public outreach efforts in summer 2025 • The GGBHTD Board of Directors adopted the MASCOTS service plan in November 2025	• Golden Gate Transit has fulfilled this SB 125 Regional Accountability Measure • MTC recommends Golden Gate Transit monitor outcomes of the MASCOTS plan and adjust service as necessary following implementation

LAVTA

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• LAVTA is currently participating in all applicable initiatives identified by MTC • Notably, LAVTA staff participate in the Transit Priority working group	• LAVTA has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• LAVTA has transitioned to operator sign-ups occurring in January and August	• LAVTA has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• LAVTA is in compliance with all basic GTFS and GTFS-Real Time best practices • LAVTA is in compliance with some but not all best practices that go beyond basic standards • LAVTA is evaluating the feasibility of implementing all remaining best practices by the end of 2027	• LAVTA has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that LAVTA continue toward implementation of the following technical revisions: o Revise stops.txt file to provide accurate wheelchair_boarding and tts_stop_name values o Perform real-time prediction accuracy monitoring for GTFS-Real Time data

NVTA

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• NVTA is currently participating in all applicable initiatives identified by MTC • Additionally, NVTA and Clipper BayPass staff have coordinated around NVTA and Napa Valley College joining the Clipper BayPass pilot	• NVTA has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• NVTA has implemented coordinated operator sign-ups in January and August • NVTA is actively participating in the Bay Area TRANSFER Plan	• NVTA has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• NVTA is in compliance with all basic GTFS and GTFS-Real Time best practices • NVTA is in compliance with some but not all best practices that go beyond basic standards	• NVTA has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that NVTA continue toward implementation of the following technical revisions: o Revise stops.txt file to provide accurate wheelchair_boarding and tts_stop_name values o Revise trips.txt file to provide accurate wheelchair_accessible values o Ensure Vehicle Positions feed fully represents Trip Updates feed in GTFS-Real Time data

		○ Provide pathways.txt file with accurate wayfinding information ○ Provide complete GTFS-Flex data for all demand responsive routes

San Joaquin Regional Rail Commission (SJRRC/ACE)

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• SJRRC is currently participating in all applicable initiatives identified by MTC	• SJRRC has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• Although private ownership of the railroad corridors limits SJRRC's ability align with the region's common operator sign-ups in January and August, SJRRC meets with Capitol Corridor (CCJPA) and Caltrain on a semi-annual basis to discuss upcoming schedule or service planning changes, as well as coordinating various transit needs at Diridon and Santa Clara ACE Stations. SJRRC also coordinates Thruway Bus and Gold Runner schedules with CCJPA and SJRRC.SJRRC will assume operations of the Great America Shuttle program beginning in FY 2026-27. SJRRC operations and planning were notified of the schedule changes starting in FY 2024-25 and will coordinate to align schedule changes with MTC and VTA.	• SJRRC has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• SJRRC is in compliance with all basic GTFS and GTFS-Realtime best practices • SJRRC is in compliance with some but not all best practices that go beyond basic standards	• SJRRC has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that SJRRC continue toward implementation of the following technical revisions:

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
		○ Revise stops.txt file to provide accurate tts_stop_name values ○ Provide pathways.txt file with accurate wayfinding information ○ Provide GTFS+ files including directions.txt, route_attributes.txt, and calendar_attributes.txt ○ Include unplanned or short-notice service changes in GTFS-Real Time feed ○ Perform real-time prediction accuracy monitoring of GTFS-Real Time data

SFMTA

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• SFMTA is currently participating in all applicable initiatives identified by MTC • In coordination with BART and MTC, SFMTA launched a mini-prototype of mapping and wayfinding at Powell Street Station in May and June 2025	• SFMTA has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• SFMTA conducts sign-ups three times per year, aligning with BART (who is on the common operator sign-up schedule) • SFMTA is actively participating in the Bay Area TRANSFER Plan • SFMTA reviews schedules to ensure bus service is available for the last BART trains at certain stations • Muni service scheduling is headway based. Even spacing between vehicles allows for seamless connections to regional services without gaps	• SFMTA has fulfilled his SB 125 Regional Accountability Measure • MTC recommends that SFMTA continue to coordinate with connecting operators to more efficiently align schedules
General Transit Feed Specification (GTFS) Audit	• SFMTA is in compliance with basic GTFS best practices • SFMTA does not provide a publicly accessible GTFS-RT feed; instead, this information is provided to MTC • SFMTA is in compliance with some but not all best practices that go beyond basic standards • SFMTA is collaborating with its CAD/AVL provider to significantly update the GTFS and GTFS-RT data that is being generated and sent to various systems • To monitor the accuracy of their GTFS-RT data, SFMTA created a dashboard that monitors arrival predictions by route, stop, etc. SFMTA also receives reporting from	• SFMTA has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that SFMTA continue toward implementation of the following technical revisions: o Revise stops.txt file to provide accurate wheelchair_boarding and tts_stop_name values o Revise trips.txt file to provide accurate information for wheelchair_accessible

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
	their prediction vendor on the performance of the predictions	and bikes_allowed values
Report on Fare Collection	• Starting in FY 2024-25, SFMTA increased the number of transit fare inspector positions in the budget by 36, bringing the total to 90. As of December 2025, there were 58 filled positions, an increase of 21 inspectors since January 2024 • Since July 2024, the number of fare inspections has doubled and SFMTA has observed a nearly 30% decline in the fare evasion rate • In late 2024, SFMTA conducted a fare enforcement study to evaluate national best practices and identify technological and deployment policies to better address both unintentional and deliberate fare evasion. Based on the findings, the SFMTA worked to design a more traditional marketing effort that resulted in the "Don't be a Dodger" campaign to reinforce the social norm of paying your fare • The "Don't be a Dodger" campaign included posting car cards throughout the fleet, A-frame boards in stations, and a social media/digital presence. As of December 2025, the campaign has performed at a level 4-times the industry average of similar campaigns • The previous educational campaign (Ways to Pay Your Fare) is still posted in the system and the Fare Inspector team can point to them as a reference point while conducting inspections	• SFMTA has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that SFMTA continue to monitor fare evasion trends while completing hiring of transit fare inspectors
Report on Ambassador Program	• In 2023, SFMTA conducted its first dedicated Rider Safety survey and developed Safety Equity Initiative Action Plans for FY 2025-26 and FY 2026-27. Recommendations included capital	• SFMTA has fulfilled this SB 125 Regional Accountability Measure

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
	improvements, service changes, staffing, communications, and community-centered announcements • SFMTA completed analysis of the 2024/2025 Rider Safety Survey and focus groups in June 2025. Three-quarters of respondents said they felt safe on Muni "always or almost always," and fewer respondents said they did not think reporting an incident would make a difference, compared to the same 2023 survey. Although most respondents did not know there was a way to report incidents, fewer respondents said they did not report an incident. • In 2025, SFMTA also established a cross-divisional working group of customer-facing staff to advise on rider safety issues and potential actions for improvement. Staff have also engaged with multilingual media to build broader awareness of the Safety Equity Initiative and the importance of reporting harassment on Muni • From FY 2017-18 to FY 2024-25, SFMTA observed a 62% decrease in incidents of crime. As of April 2025, the FY 2024-25 average was 2.14 incidents per 100,000 miles, which meets SFMTA's goal of less than 2.7 incidents per 100,000 miles	

Solano County Transit (SolTrans)

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• SolTrans is currently participating in all applicable initiatives identified by MTC	• SolTrans has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• SolTrans has transitioned to operator sign-ups occurring in January and August	• SolTrans has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• SolTrans is in compliance with all basic GTFS and GTFS-Real Time best practices • SolTrans is in compliance with all best practices that go beyond basic standards	• SolTrans has fulfilled this SB 125 Regional Accountability Measure

Western Contra Costa Transit Authority (WCCTA/WestCAT)

SB 125 Regional Accountability Measure	Progress Summary	MTC Assessment and Recommendations
Active Participation in Advancement of Regional Initiatives	• WestCAT is currently participating in all applicable initiatives identified by MTC	• WestCAT has fulfilled this SB 125 Regional Accountability Measure
Schedule Coordination	• WestCAT has transitioned to operator sign-ups occurring in January and August • WestCAT has always coordinated schedules with BART (El Cerrito del Norte), and is also working to coordinate schedules at other major transfer points	• WestCAT has fulfilled this SB 125 Regional Accountability Measure
General Transit Feed Specification (GTFS) Audit	• WestCAT is in compliance with all basic GTFS and GTFS-Real Time best practice • WestCAT is in compliance with most but not all best practices that go beyond basic standards	• WestCAT has fulfilled this SB 125 Regional Accountability Measure • MTC recommends that WestCAT continue toward implementation of the following technical revisions: o Provide pathways.txt file with accurate wayfinding information

Date: March 25, 2026
W.I.: 1514
Referred By: PAC

ABSTRACT

Resolution No. 4743

This resolution adopts MTC's FY2025-26 Productivity Improvement Program (PIP).

This resolution includes the following attachment:

- Attachment A: Productivity Improvement Program for Large and Small Transit Operators

Further discussion of this action is contained in the Programming and Allocations Committee Summary Sheet for March 11, 2026.

Date: March 25, 2026
W.I.: 1514
Referred By: PAC

Re: MTC Productivity Improvement Program

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4743

WHEREAS, Public Utilities Code (PUC) section 99244 provides that each transportation planning agency shall annually identify, analyze, and recommend potential productivity improvements which could lower the operating costs of transit operators within the area under its jurisdiction; and

WHEREAS, as provided for in Government Code sections 66500 et seq., the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area; and

WHEREAS, PUC section 99244 provides that recommendations for improvements and productivity shall include, but not be limited to, those recommendations related to productivity made in the triennial performance audits of transit operators conducted pursuant to PUC section 99246; and

WHEREAS, in accordance with PUC section 99244, MTC is required each fiscal year, to make a finding that a transit operator has made a reasonable effort in implementing productivity improvement recommendations prior to approving the allocation of Transportation Development Act (TDA) funds in an amount greater than was allocated to the operator in the preceding fiscal year; and

WHEREAS, in accordance with PUC section 99314.7, MTC is required each fiscal year, to make a finding that a transit operator has made reasonable effort in implementing productivity improvements pursuant to PUC section 99244, prior to approving the allocation of State Transit Assistance (STA) funds to the operator for operating purposes; and

WHEREAS, in accordance with PUC section 99233.2, MTC may support the regional transportation planning process by providing technical assistance funding to transit operators or other entities to implement transit productivity improvements; now, therefore, be it

RESOLVED, that MTC adopts the productivity improvement projects set forth in Attachment A to this resolution, and incorporated herein by reference; and

RESOLVED, that MTC finds that all transit operators identified in Attachment A have made reasonable effort in implementing productivity improvements and are eligible for allocations of TDA and STA funds next fiscal year in accordance with PUC sections 99244 and 99314.7.

METROPOLITAN TRANSPORTATION COMMISSION

_____
Sue Noack, Chair

The above resolution was approved by the
Metropolitan Transportation Commission
at a regular meeting of the Commission held
in San Francisco, California, and at other
remote locations, on March 25, 2026.

Fiscal Year 2025-26 Productivity Improvement Program

All Operators

Transit Operator: All Bay Area Transit Operators

Project Title: Active Participation in Advancement of Regional Initiatives

Project Goal: Improve passenger experience and enhance transit efficiency

Project Description: The Blue Ribbion Transit Recovery Task Force was convened by MTC to guide the future of the Bay Area's public transportation network as the region adjusted to new conditions created by the COVID-19 pandemic. In 2021, the Commission adopted the Transit Transformation Action Plan, leveraging this group's recommendations to document a series of near-term actions needed to begin transforming the region's transit network into a more connected, efficient, and user-focused system. In 2023, the Regional Network Management framework, including the RNM Council, was established to guide regional transit network management activities. All Bay Area transit operators will support the implementation of efforts identified in the Transit Transformation Action Plan and in the RNM Council's Work Plan, across the themes of Fares and Payment (including transit fare policy and integration pilots); Customer Information (including regional mapping and wayfinding initiatives); Transit Network Efficiency; Accessibility (including paratransit streamlining and county-based mobility management efforts); and Funding.

Appendix 1, Regional Initiative Participation Checklist, enumerates expectations for satisfactory implementation of this project.

Estimated Completion Date: Ongoing

Large Operators

Transit Operator: Alameda-Contra Costa Transit District (AC Transit)

Project Title: Trunk Line Incentive Program

Project Goal: Increase the amount of service operated on AC Transit trunk lines

Project Description: AC Transit bus operators will receive $2 per hour incentive pay on operator runs on trunk lines. These are the 13 routes in AC Transit' service network that have the highest frequency and carry the most riders at each operating division. This incentive will help ensure that there is less missed service on these routes by encouraging operators to have less absenteeism.

Estimated Completion Date: August 2026

Transit Operator: Alameda-Contra Costa Transit District (AC Transit)

Project Title: Realign Service Adjustment

Project Goal: Design the new fixed-route bus network to improve frequency, equity and reliability

Project Description: Realign created some routes and schedules that were more reliable for the operators to operate. AC Transit implemented an adjustment to Realign in February 2026 that further improves schedules and runtimes for both the operator and the customer. The early results from the February adjustment show an uptick in service reliability as measured by on-time performance. Improved reliability and more realistic schedules should translate to less operator absenteeism and a commensurate increase in service operated.

Estimated Completion Date: February 2026

Transit Operator: San Francisco Municipal Transportation Agency (SFMTA)

Project Title: SFMTA Operator Training Plan

Project Goal: The goal of the enhanced training plan is to strengthen the operator's training program by addressing identified gaps, focusing on key improvement areas, and ensuring that training outcomes aligned with the department's expectations. The purpose of the training plan is to ensure that all Transit Operators receive the ongoing training, certification, and requalification necessary to safely perform their duties. Training is

continuous and adaptive, and the program needs to evolve based on changes in laws, operational policies, technology, equipment, incident trends, and industry standards.

Project Description: To strengthen operator safety and reduce preventable accidents, the program enhanced defensive-driving training with a targeted focus on the following areas:

- Managing blind spots and wide-turn hazards to ensure operators maintain full awareness of surrounding traffic and vulnerable road users.
- Anticipating pedestrian and cyclist behavior, particularly in dense urban environments and high-activity corridors.
- Speed control in mixed-traffic and congested areas, emphasizing safe operating speeds, situational awareness, and adherence to posted limits.
- Refresher training following incidents or near-miss events, not limited to collisions, to reinforce safe practices and address identified risk patterns.
- Fatigue awareness and management, including reinforcement of rest policies and strategies to recognize and mitigate fatigue-related risks.

The training plan included two specific topics that tackle the reduction of preventable incidents:

1. *Remedial Training for Incidents/Collisions*: Targeted interventions following preventable incidents, unsafe behaviors, or rule violations. Includes skills assessments, corrective coaching, and competency-based retraining
2. *Preventable Accident Reporting Training*: Instruction in agency procedures for reporting, documenting, and reviewing preventable accidents to support a culture of accountability and continuous learning.

Estimated Completion Date: Ongoing

Transit Operator: San Francisco Municipal Transportation Agency (SFMTA)

Project Title: Bus Midlife Overhaul

Project Goal: Improve vehicle reliability by replacing and overhauling key systems

Project Description: This project involves the replacement and overhauling of major components, such as engines, traction motors, and ESS units. The project is broken into phases, each including several hundred vehicles.

Estimated Completion Date: Phase 1 is scheduled to be completed in March 2026. Phase 2 will conclude in December 2028.

Transit Operator: San Francisco Municipal Transportation Agency (SFMTA)

Project Title: Light Rail Vehicle (LRV) Replacement

Project Goal: Replace Breda light rail vehicles with new Siemens vehicles

Project Description: This project involves the replacement of SFMTA's Breda LRV fleet with new Siemens vehicles. Siemens vehicles are three to four times more reliable than Breda vehicles. All Breda vehicles have now been retired from revenue service, and 209 of the 219 ordered Siemens vehicles have been delivered.

Estimated Completion Date: October 2026

Transit Operator: San Francisco Municipal Transportation Agency (SFMTA)

Project Title: LRV4 Brake Overhaul

Project Goal: Improve vehicle reliability for Siemens LRVs

Project Description: Some of the new Siemens light rail vehicles are now six years old and are having their brakes overhauled. The first phase of the project will overhaul the brakes on 68 of the new Siemens vehicles that were delivered seven years ago at the beginning of the contract.

Estimated Completion Date: June 2027

Transit Operator: Santa Clara Valley Transportation Authority (VTA)

Project Title: Bus Revenue Fleet Replacement

Project Goal: Procure 204 diesel hybrid and battery electric transit buses

Project Description: In alignment with VTA's goal in providing safe and reliable revenue service, this project will procure 204 transit buses in three phases to replace vehicles in the agency's existing bus revenue fleet that have exceeded the end of their useful life. The new buses will be ADA compliant and equipped with ADA compliant ramps to safely board and deboard riders during revenue service.

- Phase 1: 40' Diesel Hybrid (96 Buses) to replace aging fleet procured in 2000, 2001, and 2002
- Phase 2: 40' Battery Electric (35 Buses) and 40' Diesel Hybrid (35 Buses) to replace aging fleet procured in 2002 and 2010
- Phase 3: 40' Battery Electric (22 Buses) and 40' Diesel Hybrid (16 Buses) to replace aging fleet procured in 2010 and 2011

The new buses are modern fully electric and diesel hybrid buses with start/stop technology and well as geo-fencing capabilities, which will improve service reliability, reduce maintenance downtime, and lower operating and fuel costs, as well as have the added benefit of lowering emissions, which supports VTA's sustainability goals.

This project is designed to enhance the Microgrid Electrification project at VTA's Cerone Division.

Estimated Completion Date: December 2025 (Phase 1)
December 2026 (Phase 2)
June 2029 (Phase 3)

Transit Operator: Santa Clara Valley Transportation Authority (VTA)

Project Title: ACCESS Paratransit Revenue Fleet Replacement

Project Goal: Procure up to 76 wheelchair accessible paratransit vehicles

Project Description: In alignment with VTA's goal in providing safe and reliable revenue service for VTA's Paratransit ridership, this project will procure up to 76 wheelchair accessible vehicles in three phases to replace vehicles in the agency's existing paratransit fleet that have reached or are nearing the end of their useful life. The new vehicles will be ADA compliant and equipped

with ADA compliant ramps or lifts to safely board and deboard riders during revenue service. The ramps and lifts will have a max load capacity of 1,000 pounds.

- Phase 1: 30 wheelchair accessible hybrid minivans
- Phase 2: 24 wheelchair accessible ProMaster 3500 vans
- Phase 3: 22 wheelchair accessible cutaways

The new ProMaster 3500 vans will have a floor plan that supports up to one (1) wheelchair slot and up to four (4) ambulatory seating capacity. The new cutaways will be designed to allow for up to ten (10) occupants, including the vehicle operator. The cutaway floor plan will allow for up to three (3) to four (4) wheelchair slots and up to five (5) to (6) ambulatory seating for passengers. These new cutaways will be nearly identical to the existing aging cutaways within the current paratransit fleet, except for an improved suspension system and modern technology such as a rearview camera.

The new vehicles will improve service reliability, reduce service disruptions, and lower operating, fuel, and maintenance costs, as well as have the added benefit of lowering emissions, which supports VTA's sustainability goals.

Estimated Completion Date: December 2025 (Phase 1)
April 2026 (Phase 2)
August 2027 (Phase 3)

Transit Operator: Santa Clara Valley Transportation Authority (VTA)

Project Title: Workers' Compensation Claims Performance

Project Goal: Track the number of lost workdays (TTD days) due to industrial injuries.

Project Description: Accurate tracking of number of lost workdays (TTD days) due to industrial injuries will provide valuable information to Claims Supervisor and Managers to proactively resolve claims through evaluation of cost, benefit, and risk.

Estimated Completion Date: December 2027

Transit Operator: Santa Clara Valley Transportation Authority (VTA)

Project Title: Transitional Work Program (TWP) Coordination and Monitoring

Project Goal: Proactively track and monitor Transitional Work Program (TWP) efforts per claimant to reduce the number of lost workdays.

Project Description: Track TWP days per injured worker per calendar year. Record start & end date for each TWP assignment.

Estimated Completion Date: December 2027

Small Operators

Alameda County

Transit Operator: Livermore Amador Valley Transportation Authority (LAVTA)

Project Title: Improve Schedule Adherence

Project Goal: Increase on-time performance for bus service

Project Description: Although LAVTA's on-time performance remains above its established 85 percent target, there was a steady decline in schedule adherence. As recommended in LAVTA's 2025 TDA Performance Audit, LAVTA should develop and implement further strategies to reverse the trend and improve schedule adherence on the bus service.

Estimated Completion Date: Ongoing

Transit Operator: Livermore Amador Valley Transportation Authority (LAVTA)

Project Title: Improve Mechanical Reliability

Project Goal: Reduce the mean distance between failures

Project Description: As recommended in LAVTA's 2025 TDA Performance Audit, LAVTA should continue examining maintenance activities and developing targeted strategies to address increasing mechanical failure rates.

Estimated Completion Date: Ongoing

Transit Operator: Livermore Amador Valley Transportation Authority (LAVTA)

Project Title: Reduce Preventable Bus Accidents

Project Goal: Reduce the rates of preventable accidents

Project Description: As recommended in LAVTA's 2025 TDA Performance Audit, LAVTA and its operating contractor should include additional strategies to improve operator training, identify external environmental hazards and enhance monitoring activities to ensure that safety issues are identified and corrected.

Estimated Completion Date: Ongoing

Transit Operator: City of Union City

Project Title: Battery Electric Bus Procurement

Project Goal: Procurement of new electric transit vehicles to replace aging vehicles in the existing revenue fleet

Project Description: The City of Union City is procuring eight (8) heavy-duty 35-foot battery electric buses (BEBs) to replace eight (8) of its aging compressed natural gas (CNG) buses that have met or exceeded their useful lives. The new buses will reduce service interruptions, lower maintenance costs, reduce emissions, and improve customer experience. This procurement represents a major milestone in Union City Transit's transition to a fully electric revenue fleet by 2040.

Estimated Completion Date: April 2026

Transit Operator: City of Union City

Project Title: Compressed Natural Gas (CNG) Bus Procurement

Project Goal: Procurement of new CNG transit vehicles to replace aging vehicles in the existing revenue fleet

Project Description: The City of Union City is procuring seven (7) heavy-duty 35-foot CNG buses to replace seven (7) of its aging CNG buses that have met or exceeded their useful lives. The new buses will reduce service interruptions, lower maintenance costs, reduce emissions, and improve customer experience.

Estimated Completion Date: June 2028

Contra Costa County

Transit Operator: Western Contra Costa Transit Authority (WestCAT)

Project Title: Improve Reliability of On-Time Performance Tracking

Project Goal: Prevent future issues with collecting and reporting on-time performance data

Project Description: In WestCAT's 2024 TDA Performance Audit, it was unable to provide on-time performance data for motor bus and commuter bus services. Since the audit, WestCAT has resolved the issue with its Automatic Vehicle Location (AVL) vendor. As recommended in the audit, WestCAT should continue efforts to develop and implement strategies to ensure that similar issues do not recur and that a system is in place to maintain vehicle location and schedule adherence tracking capability in the future.

Estimated Completion Date: Ongoing

Transit Operator: Western Contra Costa Transit Authority (WestCAT)

Project Title: Improve Mechanical Reliability

Project Goal: Reduce the mean distance between major failures and all failures

Project Description: As recommended in WestCAT's 2024 TDA Performance Audit, WestCAT should examine the causes of the decline in miles between mechanical failures on the bus services and take appropriate steps to improve performance and/or data collection accuracy.

Estimated Completion Date: December 2026

Napa County

Transit Operator: Napa Valley Transportation Authority (NVTA)

Project Title: Improve Schedule Adherence

Project Goal: Increase on-time performance for bus service

Project Description: Despite various post-pandemic technology and schedule improvements, on-time performance decreased during the audit period of NVTA's 2024 TDA Performance Audit. As recommended in the audit, NVTA should

continue to monitor schedule adherence on the bus service and develop strategies for improvement. NVTA will work closely with their new CAD/AVL provider who should be active starting in August 2026 to improve schedule adherence.

Estimated Completion Date: June 2027

Transit Operator: Napa Valley Transportation Authority (NVTA)

Project Title: Improve Mechanical Reliability

Project Goal: Reduce the mean distance between major failures and all failures

Project Description: NVTA has experienced significant increases in mechanical failures in its aging bus and paratransit fleets. As recommended in NVTA's 2024 TDA Performance Audit, NVTA should take steps to improve mechanical reliability on NVTA's bus and paratransit services. While delays in purchasing new vehicles are beyond NVTA's control, efforts should be made such as strategies to improve mechanic training, increased staffing as necessary, and enhanced monitoring activities to ensure that mechanical issues are identified and corrected. NVTA received four new paratransit vehicles in 2025 and expects to receive four additional vehicles in 2026 which will improve reliability.

Estimated Completion Date: December 2026

Solano County

Transit Operator: City of Fairfield (FAST)

Project Title: Improve Cost Efficiency

Project Goal: Reduce or limit increase in cost per vehicle service hour and cost per passenger

Project Description: As recommended in FAST's 2025 TDA Performance Audit, this project will develop, evaluate, and implement options to improve cost efficiency and effectiveness of the motor bus service.

Estimated Completion Date: Ongoing

Transit Operator: City of Rio Vista

Project Title: Improve Service Productivity

Project Goal: Increase passengers per hour and passengers per mile

Project Description: As recommended in Rio Vista's 2024 TDA Performance Audit, Rio Vista should continue to evaluate service delivery strategies to address the falling performance in passenger productivity and service efficiency observed during the prior and current audit periods.

Estimated Completion Date: Ongoing

Transit Operator: City of Rio Vista

Project Title: Improve Farebox Recovery

Project Goal: Increase farebox recovery ratio (i.e., passenger fares/operating costs)

Project Description: Rio Vista's farebox recovery remains far below its pre-pandemic levels. As recommended in Rio Vista's 2024 TDA Performance Audit, Rio Vista should continue to examine strategies to address the declining performance in the farebox recovery ratio by increasing passenger fare revenue, through an increase in fares and/or passenger trips.

Estimated Completion Date: Ongoing

Sonoma County

Transit Operator: City of Santa Rosa (CityBus)

Project Title: Develop & Implement Steps to Reduce Mechanical Failures on Bus Service

Project Goal: Attempt to reduce the increasing mechanical failures in the bus fleet

Project Description: As identified in Santa Rosa's 2024 TDA Performance Audit, mean distance between major failures and all failures declined during the audit period. They were previously higher and should be brought back up to a higher standard. Newer vehicles and retention of qualified maintenance staff at the contractor will be enacted to assist in bringing these distances to a higher level.

Estimated Completion Date: December 2026

Appendix 1: Regional Initiative Participation Checklist

Instructions: To assess satisfaction of the FY 2025-26 Productivity Improvement Program project related to support for regional initiatives, agency should note their advancement of each activity in the checklist below during FY 2025-26.

Mark Yes, No, or N/A for each row, and provide context in the Comments field. For Question 12, elaborate on any other initiatives that the agency undertook in FY 2025-26 to support Regional Network Management or implementation of the Transit Transformation Action Plan.

Activity	Yes	No	N/A	Comments
RNM Council				
1. Active participation in RNM Council meetings				
Fare Coordination and Integration				
2. Participation in Clipper BayPass pilot program				
3. Participation in Clipper START pilot program				
4. Active participation in staff working groups to advance regional transit fare coordination and integration				
Customer Information				
5. Active participation in staff working group(s) to develop Regional Mapping & Wayfinding Standards				
6. Active participation in efforts to improve real-time transit information				
7. Active participation in efforts to improve public communications				
8. Active participation in efforts to coordinate on customer satisfaction surveys				
Transit Network				
9. Active participation in staff working group(s) to coordinate on transit priority initiatives				
10. Active participation in subregional integration efforts				
Accessibility				
11. Active participation in staff working group(s) to coordinate on the Access & Mobility work plan				

Other Regional Network Management Involvement
12. Please describe other activities related to Regional Network Management or Transit Transformation Action Plan initiatives that the agency actively participated in during Fiscal Year 2025-26.
MTC Comments
For MTC staff to fill out. Please leave blank.

Credit: Karl Nielsen

FY 2025-26 Productivity Improvement Program and SB 125 Regional Accountability Measure Final Update

METROPOLITAN TRANSPORTATION COMMISSION

Shruti Hari

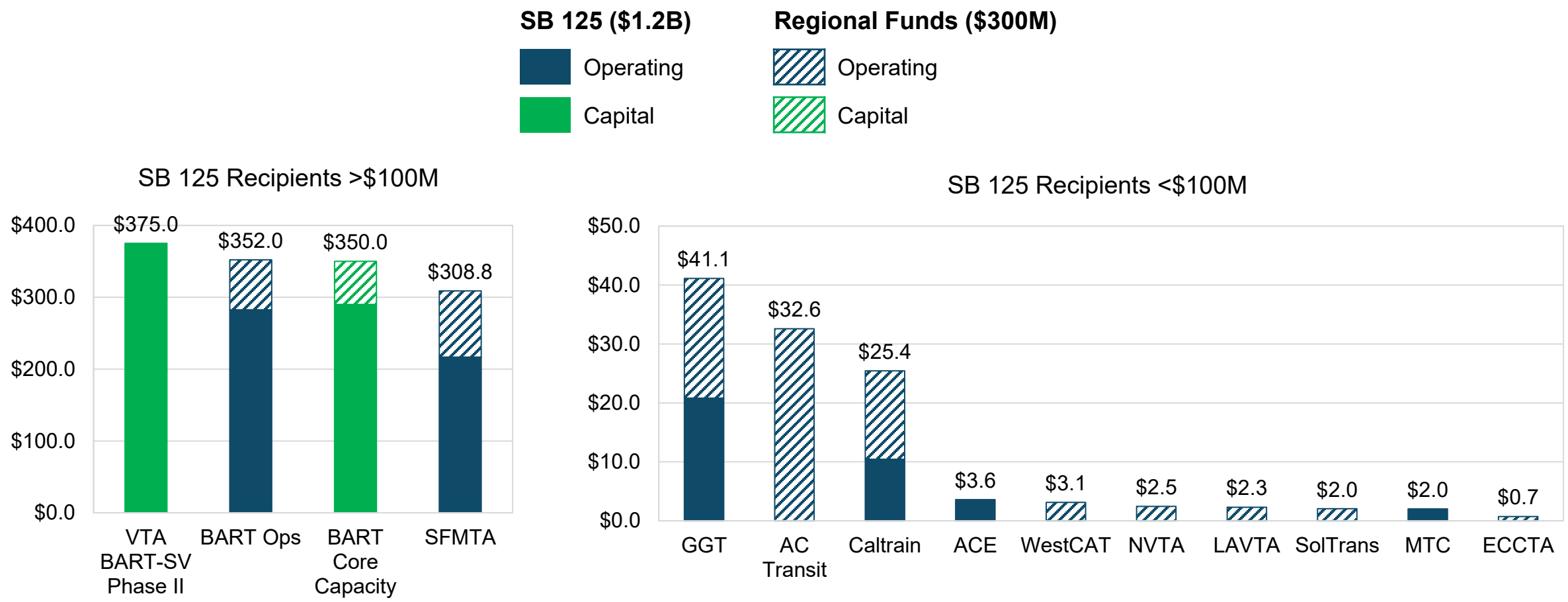
MTC Programming and Allocations Committee

March 11, 2025

SB 125 Recap

- SB 125 provides $1.2B in state support for Bay Area transit operations and/or capital projects over 5 years
  - $665M for capital projects
  - $535M for operating support
- Complemented by $300M regional contribution
- SB 125 operating funds support continued service provision
- SB 125 operating funds do not fund operator capital commitments

SB 125 State and Regional Funding Summary



SB 125 State and Regional Funding Summary

Current Status

- $728M in SB 125 funds received from state
  - All $535M in operating funds allocated and disbursed
- $300M regional funding framework fully programmed
  - All $75M in regional funds (RM3, STA) allocated
  - All $225M in federal funds (TCP, STP/CMAQ) are progressing through grants process

Near-Term Milestones

- MTC to submit the region's SB 125 Long-Term Financial Plan to the state in June 2026
- MTC to receive third tranche of SB 125 funds in Spring 2026
- MTC will advocate to secure remaining ZETCP funding through state budget process

Future Decisions

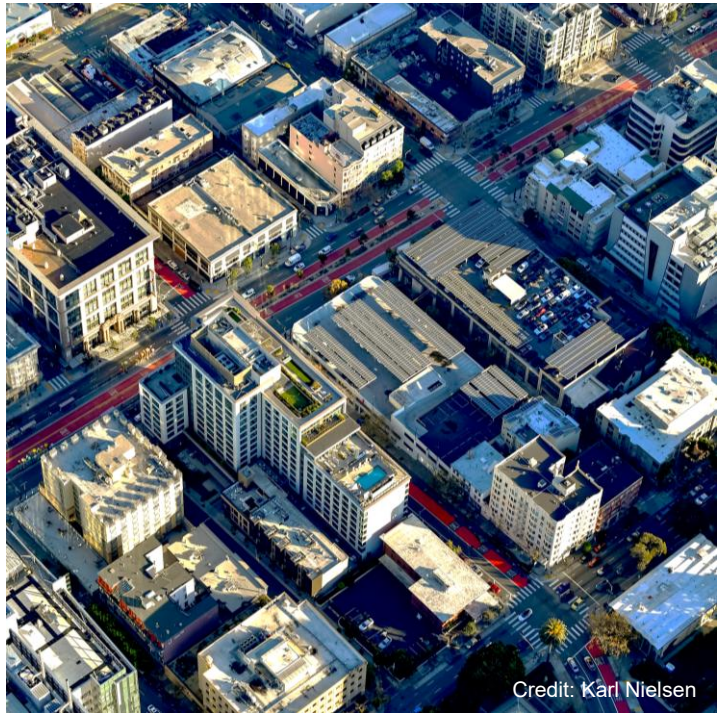
- MTC to continue working with capital funding recipients (BART, VTA) to determine cash flow needs in advance of allocation

Regional Accountability Measures

MTC Resolution No. 4619, Revised, adopted the following accountability measures that operators must advance in exchange for SB 125 operating funds. With all operating funds now disbursed, all measures have been fulfilled.

Regional Accountability Measure Type	Assigned Operator(s)
Participation in Regional Initiatives ✓	All
Schedule Coordination ✓	All
GTFS Best Practices ✓	All
Ambassador Programs ✓	BART, SFMTA
Crisis Prevention Program ✓	Caltrain
Efforts to Curtail Fare Evasion ✓	BART, SFMTA
Service Optimization ✓	AC Transit, Golden Gate Transit

Participation in Regional Initiatives


Credit: Karl Nielsen

▲ Regional Network Management Council and staff working groups for transit priority, subregional integration, access and mobility

Credit: MTC

▲ Transit fare integration efforts including Clipper START and Clipper BayPass pilot programs

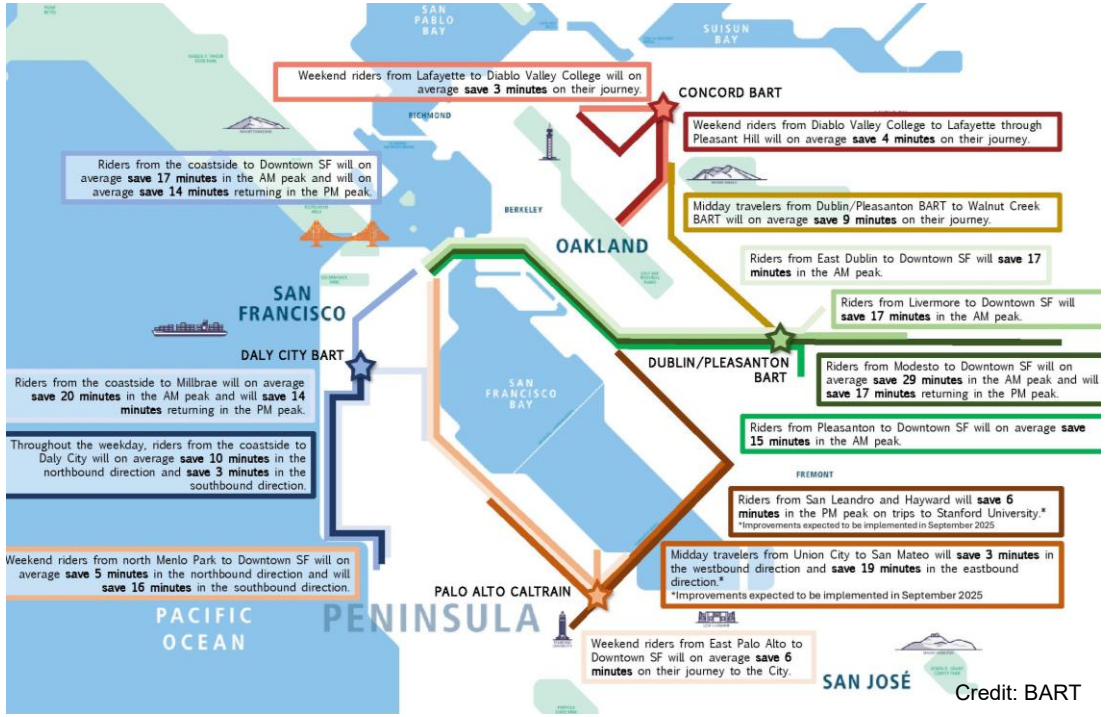
Credit: Noah Berger

▲ Regional Mapping and Wayfinding pilot projects at transit centers throughout the Bay Area

Schedule Coordination

Credit: MTC

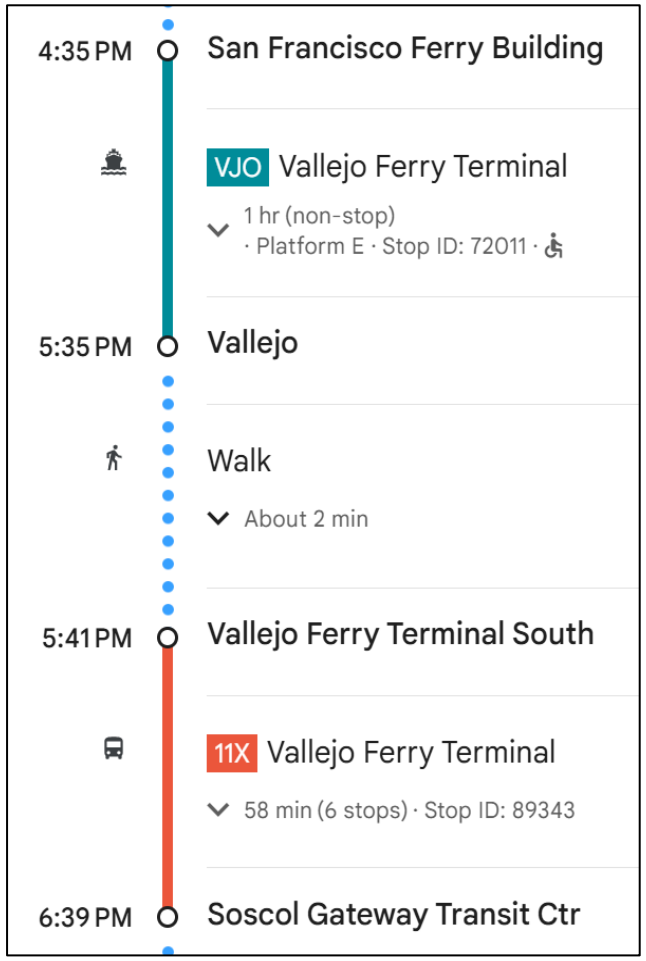
▲ All agencies shifted to a common operator sign-up schedule where possible, enabling alignment of service changes



Credit: BART

▲ The Bay Area TRANSFER Plan coordinated the region's third "Big Sync" in August 2025 across 11 operators

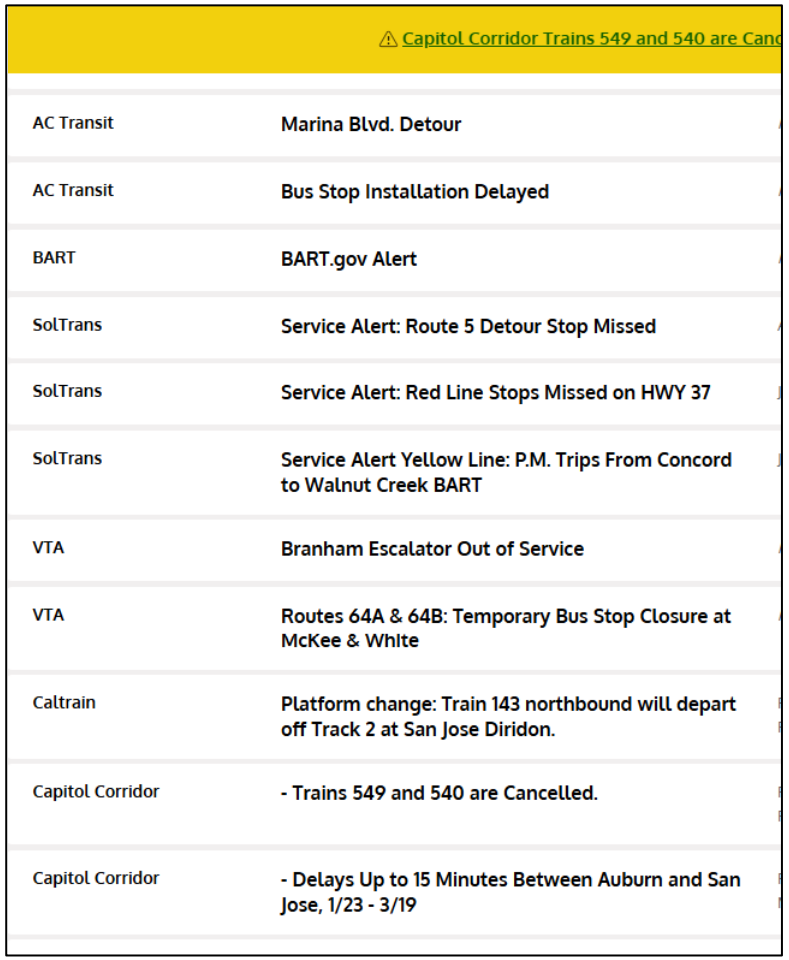
GTFS Best Practices



Credit: Google

- All operators completed an audit of General Transit Feed Specification (GTFS) public-facing schedule data and are in compliance with most best practices. Operators have developed plans for implementing remaining best practices, where feasible

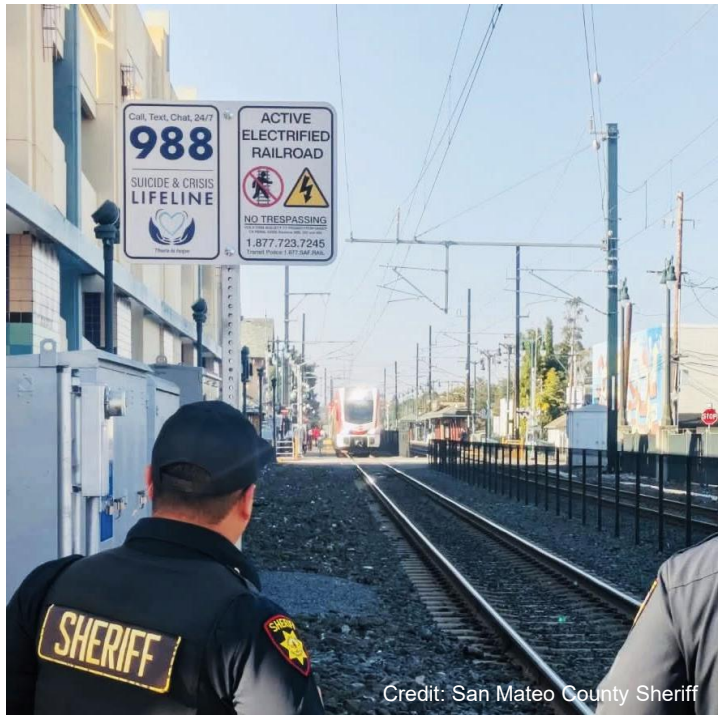
- All operators continue to participate in GTFS data sharing and real-time alerts with MTC's 511 program



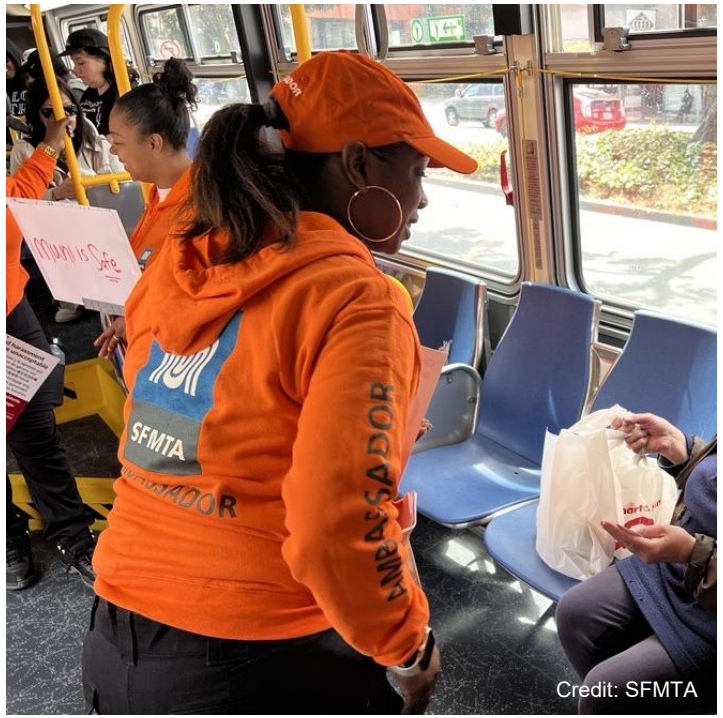
Credit: 511.org

Ambassador and Crisis Prevention Programs

▲ **BART** currently employs ~34 safety ambassadors and crisis intervention specialists and has reported improved safety metrics



▲ **Caltrain** replaced all signage with 988 crisis hotline as part of ongoing trespasser prevention and safety education efforts



▲ **SFMTA** completed its 2024/2025 Rider Safety Survey and focus groups to measure effectiveness and identify safety improvements

Efforts to Curtail Fare Evasion

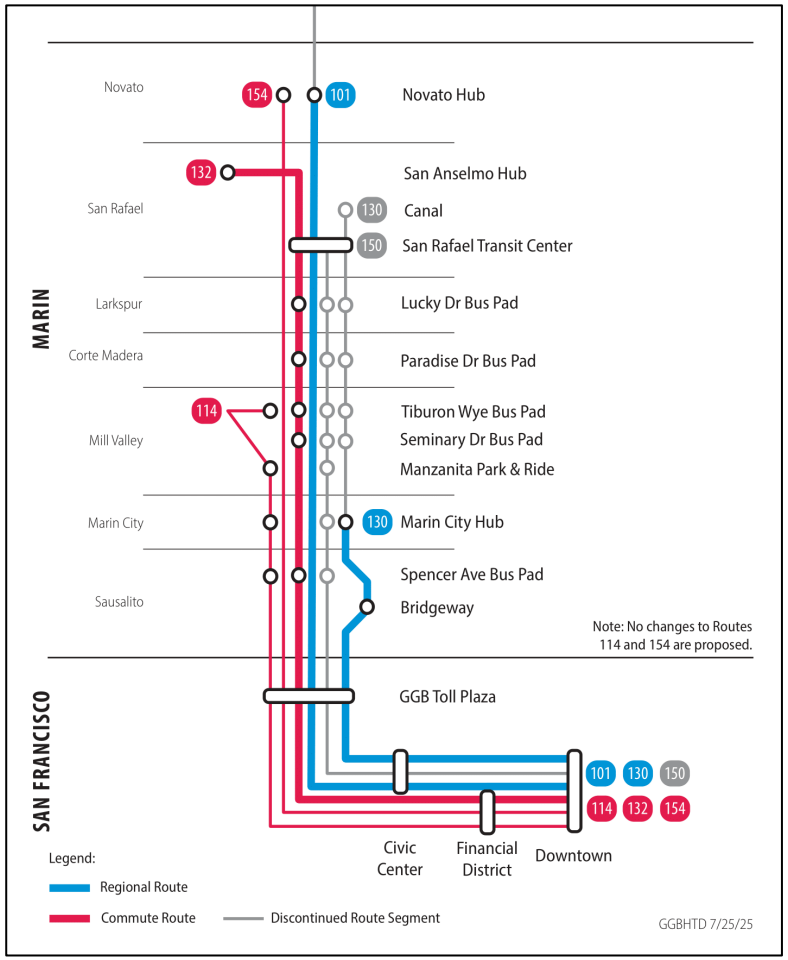
▲ **BART** completed Next Generation Fare Gate installation at all 50 stations in fall 2025

▲ **SFMTA** conducted two public education campaigns, hired more fare inspectors, and doubled fare inspections since 2024

Service Optimization

◄ **AC Transit** implemented the Realign bus network redesign in August 2025

► In fall 2025, **Golden Gate Transit** completed public outreach and adopted the MASCOTS plan to optimize service in coordination with other Marin and Sonoma operators



What's Next: Future Operating Assistance

SB 125

- Operating support from SB 125 and the Regional Funding Framework concludes with FY 2025-26
- In FY 2026-27 and beyond, some operators are projecting significant budgetary shortfalls

FY27 State Loan

- MTC and transit agency partners worked with the state to identify bridge funding for FY 2026-27 to sustain operations until SB 63 would take effect in 2027

SB 63

- Authorized a November 2026 ballot measure to provide operating funds for 14 years
- MTC is conducting Phase 1 of the SB 63 Financial Efficiency Review this spring to:
  - Summarize past cost-saving measures for AC Transit, BART, Caltrain, SFMTA
  - Identify early-action strategies for each operator to improve rider outcomes and cost effectiveness

Productivity Improvement Program (PIP)

- Each fiscal year, MTC adopts the PIP to ensure accountability for recipients of operating funds
  - The PIP provides specific projects for each operator to improve financial and operational efficiency
  - Operators must advance PIP projects to receive operating funds
- Typically, PIP projects are derived from the findings of each operator's Triennial TDA Performance Audit
- For FY24 and FY25, the PIP incorporated the SB 125 Regional Accountability Measures in place of the triennial audit

FY 2025-26 PIP

MTC Resolution No. 4743 details the proposed FY 2025-26 PIP projects for each operator

Operators	FY 2025-26 PIP Projects
All Operators	• Productivity-related findings from their most recent Triennial TDA Performance Audit (conducted in FY 2023-24 or FY 2024-25) • Active participation in advancement of regional initiatives
AC Transit, BART, Caltrain, SFMTA	• The PIP will be revised to incorporate the operator-adopted recommendations from Phase 1 of the SB 63 Financial Efficiency Review • SB 63 requires operators to take action in response to the findings • The FY 2025-26 PIP will provide a streamlined framework for MTC to track progress and ensure accountability

Recommended Action and Next Steps

Recommended Action

- Staff request referral of MTC Resolution No. 4743, FY 2025-26 Productivity Improvement Program (PIP), to the Commission for adoption

Next Steps

- In August, the Commission will revise the PIP to include the operator-adopted recommendations from Phase 1 of the SB 63 Financial Efficiency Review
- Operators will report on the status of PIP projects in their TDA/STA Claims throughout FY 2026-27

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0409, **Version:** 1

Subject:
Final Plan Bay Area 2050+ (Consolidated Slide Deck for items 10b through 10e)

Overview of the regional plan for transportation, housing, economic development, and environmental resilience under development since mid-2023, including revisions made based on feedback during the final round of public engagement.

Presenter:
Dave Vautin

Recommended Action:
Information

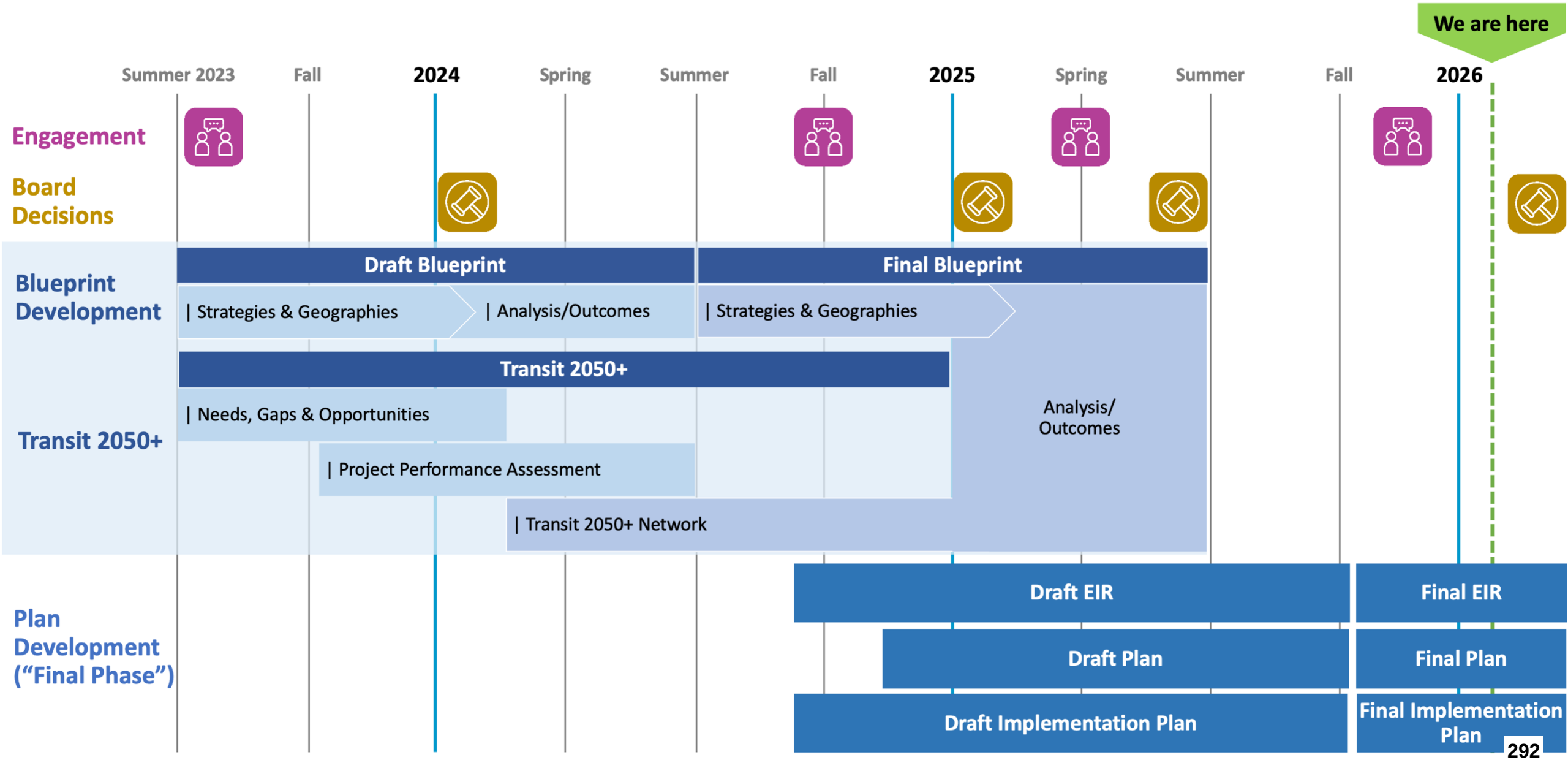
Final Plan Bay Area 2050+

Metropolitan Transportation Commission

Wednesday, March 25, 2026

Photo: Karl Nielsen

Plan Bay Area 2050+: From Summer 2023 to Today



** Dates are tentative and subject to change*

Plan Bay Area 2050+: Vision, Elements, and Themes

Vision and Guiding Principles

*Ensure by the year 2050 that the Bay Area is **affordable**, **connected**, **diverse**, **healthy** and **vibrant** **for all**.*

Four Elements

11 Themes, 35 Strategies

- Maintain and Optimize the Existing System
- Create Healthy and Safe Streets
- Build a Next-Generation Transit Network
- Protect and Preserve Affordable Housing
- Spur Housing Production at All Income Levels
- Create Inclusive Communities
- Improve Economic Mobility
- Shift the Location of Jobs
- Reduce Risks from Hazards
- Expand Access to Parks and Open Space
- Reduce Climate Emissions

*Note: **Plan Bay Area does not** allocate money to projects or strategies, override local land use authority, impose mandates, or propose specific legislation.*

Plan Bay Area 2050+: Growth Geographies

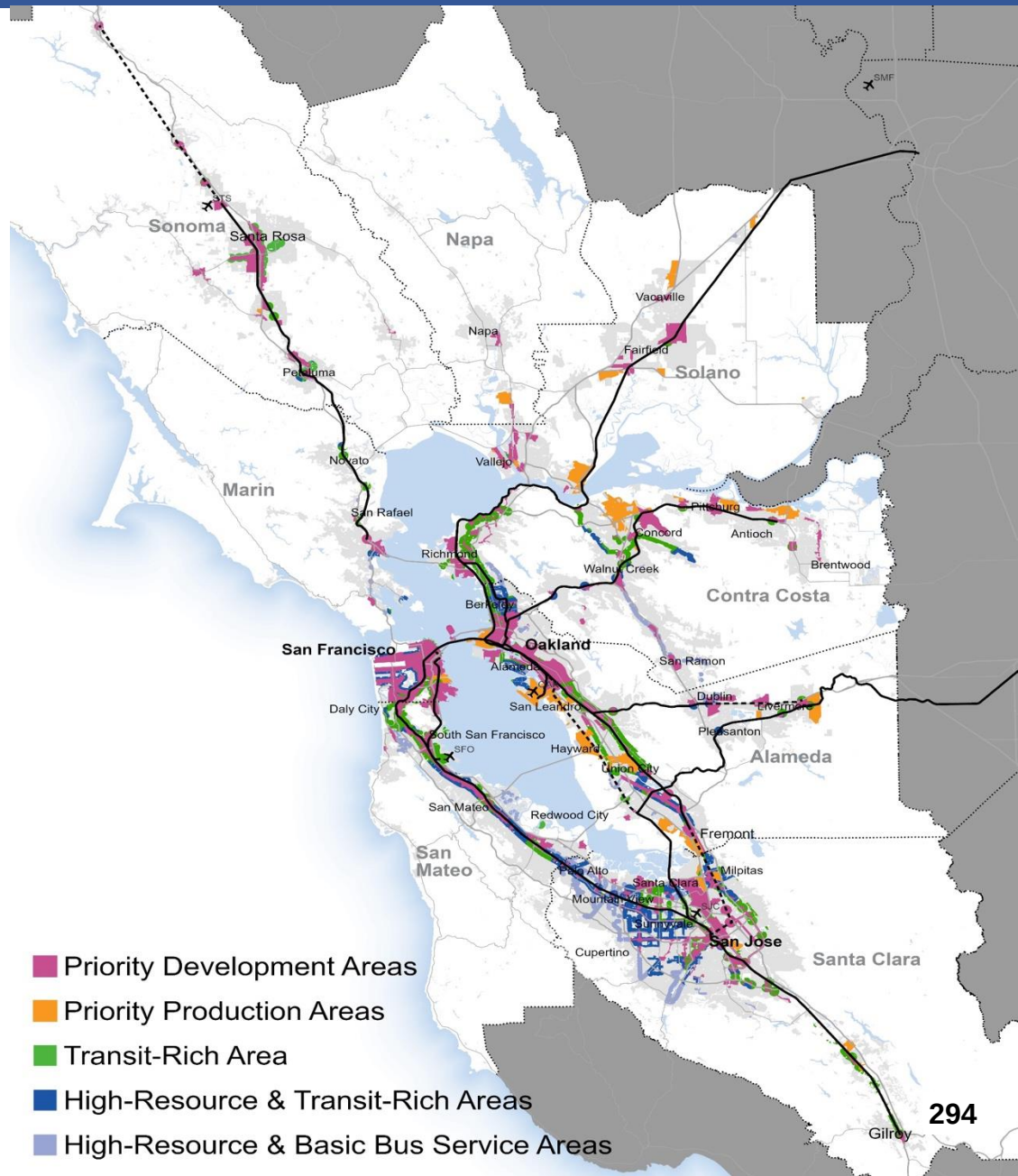
A Focused Growth Pattern

96% of new households are within Growth Geographies

72% of new jobs are within Growth Geographies

<1% of new development is outside local urban boundaries

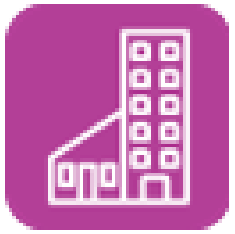
Reminder: Growth geographies include locally nominated PDAs and Priority Production Areas (PPAs), as well as regionally identified High-Resource Areas and Transit-Rich Areas.



Plan Bay Area 2050+: Key Outcomes by 2050

-25% housing and transportation cost burden for all households and **-50% for low-income households**

+45% share of households **near frequent transit** and **+40% jobs accessible via transit, biking or walking**



+30% homeownership rate for low-income households

+110% share of people **commuting** via **transit, biking or walking**

+25% publicly **accessible open space** acres per capita

+60% per-capita **gross regional product**

Plan Bay Area 2050+: Implementation Highlights

Photo Credit: bart.gov

Photo Credit: Noah Berger

Photo Credit: ThisisEngineering RAEng/Unsplash

FUND & ADVOCATE

- ❑ Prepare for a new regional transit revenue measure
- ❑ Coordinate with partners on potential near-term ballot measure(s) to expand affordable housing funding
- ❑ Support reforms to SB 375 and related state planning guidelines

PLAN & COORDINATE

- ❑ Update how MTC prioritizes and sequences large transportation capital projects following Plan Bay Area 2050+ adoption
- ❑ Analyze post-COVID shifts in travel, remote work, and land-use patterns
- ❑ Increase engagement with the disability community to collaboratively and comprehensively meet needs

DELIVER & ASSIST

- ❑ Implement and monitor Transit-Oriented Communities (TOC) policy to foster transit-supportive development and quality design
- ❑ Expand Clipper BayPass, advance regional wayfinding programs and transit priority initiatives
- ❑ Expand planning, funding and project delivery technical assistance for sea level rise adaptation

Plan Bay Area 2050+: Engagement Highlights

Draft Plan Bay Area 2050+ was **guided by input from 17,500+ Bay Area residents** from all nine Bay Area counties who shared their priorities for the future.

41 Pop-Up Workshops

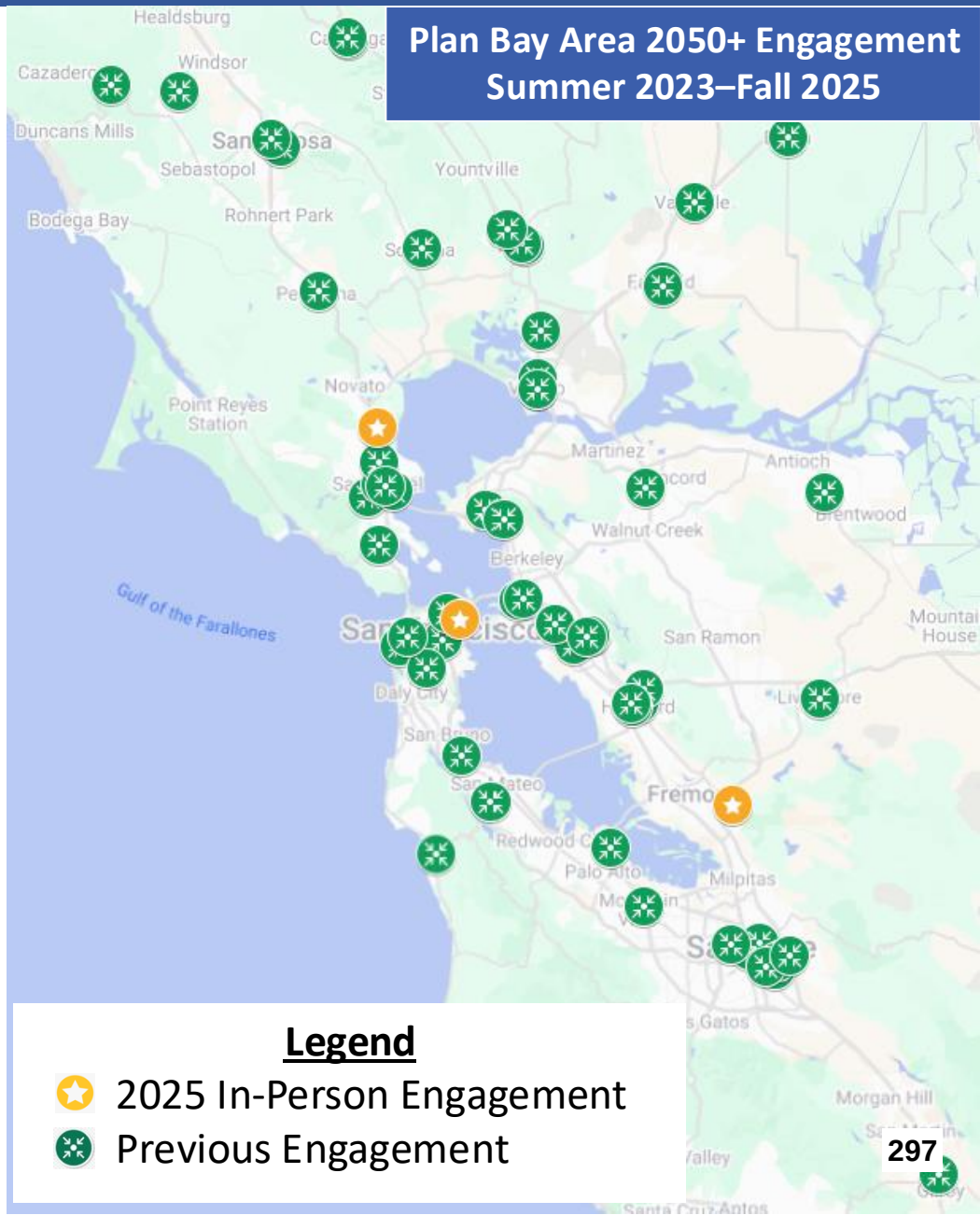
3 Online Surveys

22 Community-Based Organization Partnerships

10 Webinars and Technical Workshops

3 Hybrid Public Hearings +
9 CTA Board Presentations *(Fall 2025)*

Widespread Digital Promotion

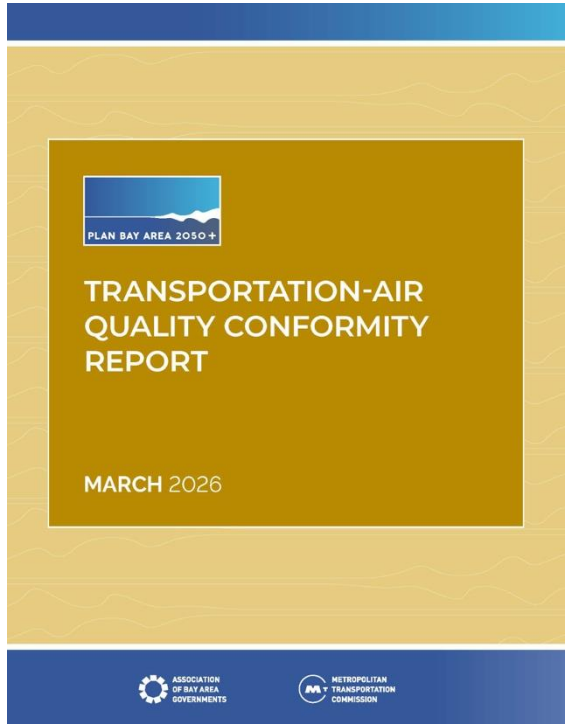


Proposed Final Plan Bay Area 2050+: Highlighting Revisions between Draft & Final

Photo: Noah Berger

Proposed Items to Advance to Commission & Board

10b



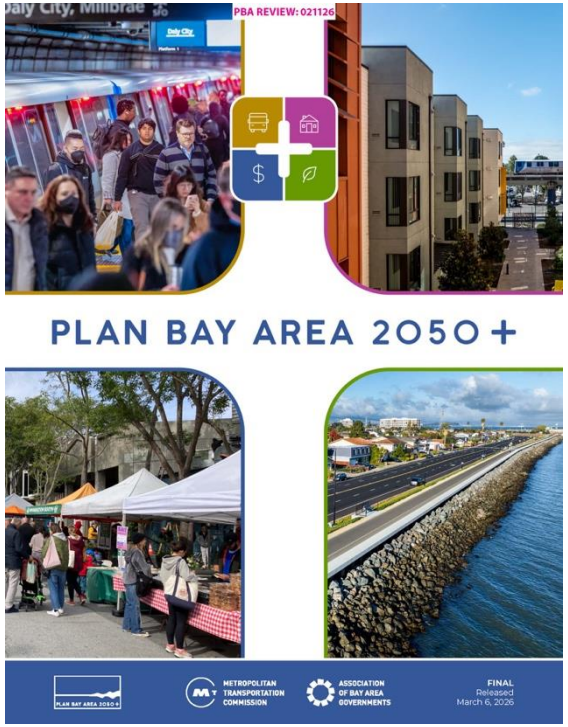
METROPOLITAN TRANSPORTATION COMMISSION

10c

METROPOLITAN TRANSPORTATION COMMISSION

ASSOCIATION OF BAY AREA GOVERNMENTS

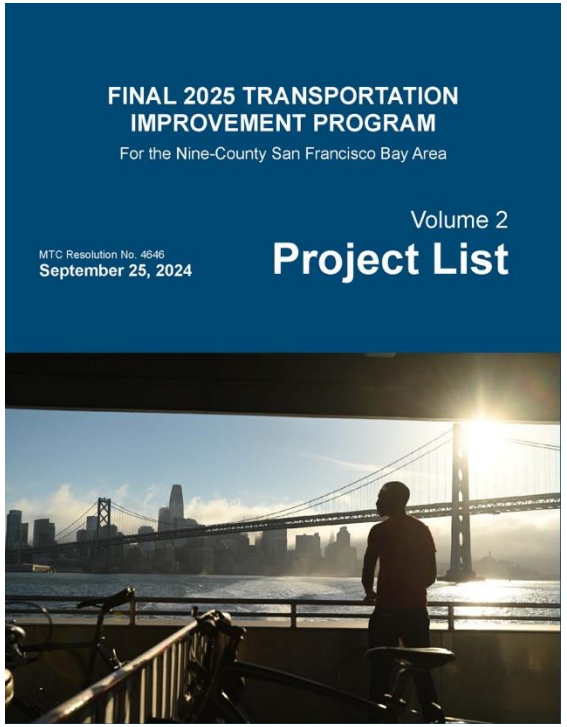
10d



METROPOLITAN TRANSPORTATION COMMISSION

ASSOCIATION OF BAY AREA GOVERNMENTS

10e



METROPOLITAN TRANSPORTATION COMMISSION

Refresher: February 2026 Summary of Comments

Last month, staff provided an overview of public and stakeholder feedback from the final round of engagement to the MTC Planning and ABAG Administrative Committees.

In addition to responding to all comment letters, an FAQ on the Regional Growth Forecast, finalized in January 2025, was posted on ***planbayarea.org****.*

Implementation

"The Plan lays out an ambitious and comprehensive vision. What will build public confidence is clarity around how strategies will be phased, funded, and tracked over time."

Affordability

"I'm glad to see affordable housing in this vision. The question for many of us is how housing and transportation together will actually become more affordable for working families and seniors."

Local Capacity

"Many cities support the goals of the Plan but will need clearer alignment between regional expectations and local fiscal capacity to implement infrastructure, services and housing without placing disproportionate strain on local governments."

Regional Growth

"I'm curious how the Plan Bay Area population growth forecast aligns with what the Department of Finance shows."

Transit Service

"If you want us to use public transportation, it has to run when people actually need it — late at night, early in the morning, and for people who can't drive."

Equity

"Equity is clearly a priority in the Plan. I encourage MTC and ABAG to continue refining how equity is measured so that communities with fewer fiscal resources can realistically implement the strategies being proposed."

What's Changed: Final Plan & Supplemental Reports

The proposed Final Plan documents reflect **targeted refinements** informed by public comments; however, the underlying strategies, geographies, and structure remain consistent with Commission and Board actions in 2025.

Summary of Edits:

- **Plan Document:** Refinements include an added Executive Letter, refreshed engagement metrics, minor map and data updates, new references to the Resilience Project List, and clarifications throughout.

- **Supplemental Reports:** Finalized with modest clarifications, improved documentation, and formatting updates.

  Select reports were refined to improve transparency and responsiveness to public comments. One new report — the **Resilience Project List Report** — was added to consolidate previously released information without introducing new policy or analysis.

Image Source: Noah Berger

What's Changed: Final Implementation Plan

Targeted edits were made to the proposed final Implementation Plan, which identifies **65 actions** for MTC and ABAG to take over the **next five years**.

Summary of Edits:

- Added **Action 63** to respond to growth forecast feedback, **recommending convening a technical advisory committee to review and update the Regional Growth Forecast Methodology.**
- Nine actions had refinements that resulted in minor scope changes or significant re-wording based on feedback received during the public comment period, most notably the **merger of two related action items associated with Active Transportation and Vision Zero** into a single cohesive action.
- The remaining actions required only minor or no edits, with minor edits focused on improving clarity, adding examples, and ensuring consistency across the document.

Image Source: Noah Berger

What's Changed: Final EIR

The Final EIR includes **responses to public comments**, as well as minor **revisions to the Draft EIR**. This document will be complemented by the **Mitigation Monitoring and Reporting Plan** (MMRP) and **Findings of Fact**, which will be presented prior to final adoption.

Summary of Final EIR:

- **Responses to Public Comments.**
  Comments and responses address environmental issues raised during the public review process.

- **Master Responses Address Key Issues.**
  Because many comments raised similar topics, master responses were developed to provide comprehensive, consistent, and thorough responses.

- **Revisions to the Draft EIR.**
  Public comments informed targeted refinements to the Draft EIR, including clarifications, improved documentation, and minor updates where appropriate.

Image Source: Ben Botkin

Key Takeaways: Final EIR

No significant new information was added to the Draft EIR in the Final EIR that would warrant recirculation.

Revisions, refinements, and responses to comments serve to clarify and amplify past analysis in the Draft EIR.

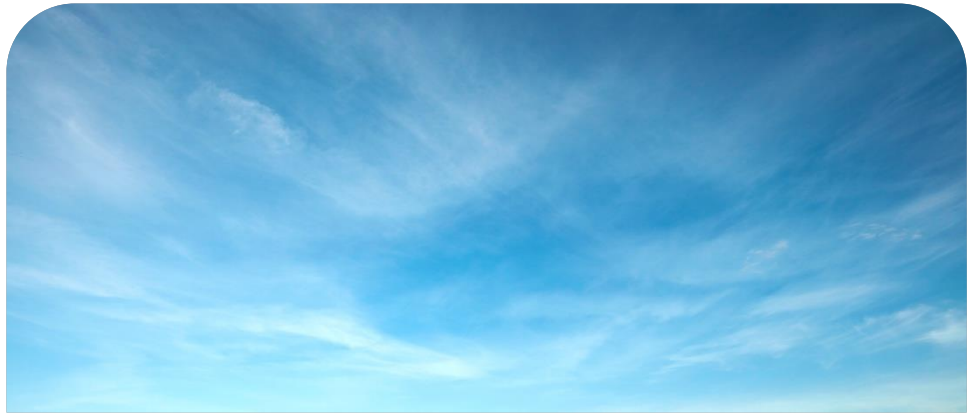
The Final EIR did not identify any new significant environmental impacts relative to the Draft EIR.

Furthermore, the Final EIR did not identify any substantial increases in the severity of any significant impact.

The Final EIR does not make a recommendation on which alternative to advance.

Direction from the joint Committee will shape the CEQA Findings.

Key Findings: Air Quality Conformity & TIP Consistency



TRANSPORTATION-AIR QUALITY CONFORMITY

- Federally required process to evaluate whether Plan Bay Area 2050+ and the Amended 2025 TIP comply with federal air quality requirements.
- The Draft Conformity Analysis was released for a 30-day public review period ending January 21, 2026, and demonstrates regional emissions are well within allowable limits for ozone and PM2.5.
- **Staff finds that Plan Bay Area 2050+ and the Amended 2025 TIP meet federal conformity requirements for ozone and PM2.5.**

2025 TRANSPORTATION IMPROVEMENT PROGRAM

- The TIP is the region's programming document for implementing Plan Bay Area 2050+ transportation projects and programs.
- This amendment serves to conform the 2025 TIP to Plan Bay Area 2050+ along with other project changes.
- **Staff finds that the 2025 TIP, as amended, is consistent with Plan Bay Area 2050+.**

Notable Considerations Prior to Adoption

RISKS OF NOT ADOPTING

- **Conformity Lapse Constraints:** The Bay Area is currently in a conformity lapse grace period, which may limit federal approvals and delay actions needed to advance regionally significant transportation projects.
- **Funding & Delivery Impacts:** Continued delays in plan adoption may jeopardize state funding eligibility (e.g., SB 1 programs) and further slow the delivery of transportation projects and programs.

PLAN BAY AREA 2050+ IMPLEMENTATION

- **Implementation Focus:** Following adoption of Plan Bay Area 2050+, staff will focus on implementing the plan's adopted actions, working with regional, state, and local partners to advance near-term priorities.
- **Annual Updates:** Staff will report annually to the joint committees on overall implementation progress, including progress on key performance metrics monitored through Vital Signs.

What's Coming Later This Year: Plan Bay Area 2060

Major Plan Update

- In mid-2026, MTC and ABAG will initiate Plan Bay Area 2060, using **blue-sky thinking and scenario planning** to help the region navigate increasing uncertainty.
- The update will evaluate **alternative policy and funding futures while examining transformative forces** shaping the Bay Area.

Urgent Questions

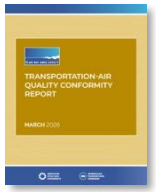
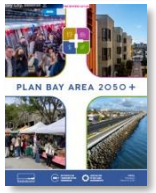
- *How will **technology** reshape travel and economic activity?*
- *How will **automated vehicles** affect mobility and infrastructure needs?*
- *How will **demographic shifts** influence housing, workforce, and mobility needs?*
- *How will **funding uncertainty** affect fiscal sustainability*?

An Uncertain Future

- Plan Bay Area 2060 will reassess these assumptions to reflect emerging trends, uncertainty, and long-term regional realities.
- Staff will return later this spring with an early preview of Plan Bay Area 2060.

Referred Items for Commission Approval

Following a joint meeting with the ABAG Administrative Committee, the Planning Committee referred **four items** to the Commission for approval.

AGENDA ITEMS	METROPOLITAN TRANSPORTATION COMMISSION	ASSOCIATION OF BAY AREA GOVERNMENTS
 10b Transportation-Air Quality Conformity Analysis	MTC Resolution No. 4748	*no action requested*
10c Final Plan Bay Area 2050+ EIR	MTC Resolution No. 4749	ABAG Resolution No. 01-2026
 10d Final Plan Bay Area 2050+	MTC Resolution No. 4750	ABAG Resolution No. 02-2026
10e 2025 TIP Amendment	MTC Resolution No. 4646, Revised	*no action requested*

PLAN BAY AREA 2050+

ASSOCIATION OF BAY AREA GOVERNMENTS
METROPOLITAN TRANSPORTATION COMMISSION

Thank you!

The proposed final plan documents are available for review at planbayarea.org; in-person and by appointment at 375 Beale Street in San Francisco; or by emailing info@planbayarea.org or calling (415) 778-6757 to make alternative arrangements to access the document

Photo: Karl Nielsen

Attachment A: Plan Bay Area 2050+ Handout

Summarizing Comments Received in March 2026

The table below summarizes comments received following the release of the proposed final Plan Bay Area 2050+ and the Final Environmental Impact Report for Plan Bay Area 2050+ **between 6:30 p.m. on Friday, March 6, 2026, and 5:00 p.m. on Thursday, March 12, 2026.**

#	Commenter / Date	Topics	Summary of Comments
1	**Ken Kershner** 03/08/2026 (12:46 p.m.)	Active Transportation / Micromobility	The commenter supports elements of Plan Bay Area 2050+, including the Bay Skyway project and the plan's equity framing, but argues that the plan treats micromobility primarily as a complement to cars and transit rather than as a primary transportation mode. The commenter raises concerns about the lack of a cycling mode share target, inadequate and insecure funding for active transportation, reliance on painted bike lanes instead of separated facilities, and remaining gaps in the regional cycling network.
2	**Kevin Rennie** 03/08/2026 (8:25 p.m.)	Active Transportation / Micromobility	The commenter supports elements of Plan Bay Area 2050+, including the Bay Skyway project and the plan's equity framing, but argues that the plan treats micromobility primarily as a complement to cars and transit rather than as a primary transportation mode. The commenter raises concerns about the lack of a cycling mode share target, inadequate and insecure funding for active transportation, reliance on painted bike lanes instead of separated facilities, and remaining gaps in the regional cycling network.
3	**Bill Mayben** 03/09/2026 (12:56 p.m.)	Sea Level Rise Adaptation and Climate Resilience	The commenter emphasizes the importance of prioritizing sea level rise mitigation and climate resilience in implementing Plan Bay Area 2050+, noting that many proposed initiatives depend on effective shoreline and infrastructure adaptation. The commenter highlights the need to ensure emergency preparedness capacity—including shelter, food, water, medical care, and transportation—during

#	Commenter / Date	Topics	Summary of Comments
			severe climate events. The commenter also cautions that clear prioritization, budgeting, and sequencing of projects will be necessary to avoid implementation challenges and account for increasingly severe environmental conditions.
4	**Jim Stallman** 03/09/2026 (7:54 p.m.)	Rail Service Expansion	The commenter advocates for rail service expansion south into Monterey County.
5	**Ken Kershner** 03/10/2026 (9:02 p.m.)	Micromobility and Bicycle Infrastructure Standards	The commenter acknowledges the plan's investments in micromobility strategies but argues that the effectiveness of these investments depends on stronger definitions and standards. The commenter calls for requirements for physically separated bicycle infrastructure on higher-speed arterials, inclusion of micromobility facilities such as e-bike and e-scooter parking at transit hubs and linking transportation funding in Priority Development Areas (PDAs) to protected corridor infrastructure. The commenter also requests that the plan establish a specific mode share objective for micromobility trips.
6	**Brenda Dohmen** 03/11/2026 (5:05 p.m.)	Housing Density and Growth Assumptions Transportation Costs and Infrastructure Spending Governance and Representation	The commenter expresses opposition to the adoption of Plan Bay Area 2050+ and the Final Environmental Impact Report, arguing that the plan promotes unnecessary densification despite population trends and resident outmigration. The commenter raises concerns about the cost and effectiveness of transportation investments, the financial burden on taxpayers, and insufficient local representation in the regional planning process. The commenter urges MTC and ABAG to reject the plan and prioritize more cost-effective infrastructure maintenance.
7	**David Stahlberg** 03/12/2026 (8:08 a.m.)	Public Transit Service and Bus Operations	The commenter expresses concern about the planned discontinuation of Route 101 (Golden Gate Transit) bus service north of Novato into Sonoma County beginning in April 2026. The commenter states that the service change would place an additional burden

#	Commenter / Date	Topics	Summary of Comments
			on riders who rely on the route for transportation, particularly given rising gasoline prices.
8	**Bill Mayben** 03/12/2026 (1:28 p.m.)	Sea Level Rise Adaptation and Climate Resilience	The commenter emphasizes the importance of coordinated regional planning to prevent flooding around the bay. The commenter highlights the accelerating nature of climate change and questions whether current planning sufficiently accounts for timelines, sequencing, and potential delays caused by severe climate events. The commenter suggests clearer prioritization, scheduling, and centralized project management to coordinate mitigation and adaptation efforts.

Attachments:

- Comments received between 6:30 p.m. on March 6, 2026, and 5:00 p.m. on March 12, 2026

Outlook

Public Comment: Plan Bay Area 2050+ Falls Short on Micromobility

From Ken Kershner <[redacted]
Date Sun 2026-03-08 12:46 PM
To Plan BayArea Info <info@planbayarea.org>
Cc SVBC general <svbcbikes@bikesiliconvalley.org>; Nash, Betsy <bnash@menlopark.gov>

You don't often get email from ken@triomotors.co. Learn why this is important

External Email

To the MTC Planning Committee and ABAG Administrative Committee,

Thank you for the opportunity to comment on the proposed Final Plan Bay Area 2050+. I write as an advocate for micromobility and active transportation infrastructure.

The plan has genuine strengths. The Bay Skyway — particularly the West Span bicycle and pedestrian pathway projected to carry 7,500 bicycle trips per hour — is a world-class, visionary project. The equity framing around communities like West Oakland, where 26% of households lack vehicle access, is exactly the right lens.

However, overall, Plan Bay Area 2050+ treats micromobility as a complement to cars and transit rather than as a primary mode in its own right. I urge the Commission and Board to address the following gaps before adoption:

1. NO CYCLING MODAL SHARE TARGET. The plan sets a goal of reducing solo car commuting to 33% by 2050 — but it does not include a headline target for cycling's share of trips. The Netherlands, where 27% of all trips are made by bicycle, achieved that through explicit, enforceable targets. We need the same.

2. FUNDING IS INADEQUATE AND INSECURE. The Netherlands invests approximately $35 per resident per year in cycling infrastructure. The Bay Skyway itself has no identified funding source despite costs in the hundreds of millions. Active transportation deserves a guaranteed, ring-fenced allocation — not discretionary dollars competing against highway interchanges.

3. PAINT IS NOT INFRASTRUCTURE. The plan's "Complete Streets" approach largely retrofits roads with painted bike lanes. The Dutch standard — physically separated cycling infrastructure on every arterial — is what actually moves the needle on safety and ridership. The Bay Area should adopt that as the design baseline, not the exception.

4. CONNECTIVITY GAPS REMAIN. Isolated showcase projects do not make a network. Amsterdam and Utrecht saw cycling surge, specifically when they built continuous grids connecting homes to schools, shops, and train stations. Plan Bay Area 2050+ is still filling gaps in the Bay Trail rather than building a cohesive regional cycling grid.

Plan Bay Area 2050+ is ambitious by American standards — but American standards are not good enough. I urge MTC and ABAG to raise the bar: add a cycling modal share target, secure dedicated active transportation funding, adopt separated infrastructure as the default design standard, and prioritize network completeness over individual landmark projects.

Thank you for your consideration.

Ken Kershner
Menlo Park, San Mateo County
--
Ken Kershner | Co-Founder & CEO

[redacted]

After nearly three years of public discussion, technical analysis and refinement, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) released the proposed final Plan Bay Area 2050+ and the Final Environmental Impact Report (EIR) for Plan Bay Area 2050+. Read the proposed final Plan Bay Area 2050+ and its supplemental reports at planbayarea.org/finalplan.* The Final EIR for Plan Bay Area 2050+ also can be accessed online at planbayarea.org/2050/environmental-impact-report-eir.

This notice is provided pursuant to Public Resources Code section 21092.5, which requires that the lead agency provide a written proposed response to all public agencies that made comments on the EIR at least 10 days prior to certification of the EIR. The responses are now available at https://planbayarea.org/2050/environmental-impact-report-eir.

The plan and its related reports will be presented for review and consideration at a joint meeting of the MTC Planning Committee with the ABAG Administrative Committee on Friday, March 13 before referring them to their respective approving bodies.

The ABAG Executive Board will consider adoption of the final plan and certification of the Final EIR at their March 19 meeting. The Commission will consider certifying the Final EIR and adopting the final plan, Air Quality Conformity Analysis and 2025 TIP Amendment at their March 25 meeting.

This release follows a 59-day public comment period for the draft plan and the Draft EIR that closed on December 18, 2025. The proposed final plan and Final EIR have been updated to reflect feedback received during the public comment period. All comments received on the draft plan and related supplemental reports can be found on the Draft Plan Bay Area 2050+ page of the Plan Bay Area website. Comments received on the Draft EIR, along with responses, are available at https://planbayarea.org/2050/environmental-impact-report-eir.

Tune In to the Meetings!

- Joint MTC Planning Committee and ABAG Administrative Committee
  March 13, 2026 | 9:45 a.m.
  At this meeting, the committees will consider referring certification of the Final EIR and adoption of the proposed final plan to their respective approving bodies.

- ABAG Executive Board
  March 19, 2026 | 5 p.m.
  At this meeting, the Executive Board will consider certifying the Final EIR and adopting the proposed final plan.

- Metropolitan Transportation Commission
  March 25, 2026 | 9:35 a.m.
  At this meeting, the Commission will consider certifying the Final EIR and adopting the proposed final plan.

Please visit the ABAG & MTC Meetings page on the planbayarea.org website to view the agendas, and information for participating remotely and in person. Additional information on participating also is available on the MTC website.

Outlook

Public Comment: Plan Bay Area 2050+ Falls Short on Micromobility

From K Rennie [redacted]
Date Sun 2026-03-08 8:25 PM
To Plan BayArea Info <info@planbayarea.org>

[redacted]

External Email

To the MTC Planning Committee and ABAG Administrative Committee,

Thank you for the opportunity to comment on the proposed Final Plan Bay Area 2050+. I write as an advocate for micro-mobility and active transportation infrastructure.

The plan has genuine strengths. The Bay Skyway — particularly the West Span bicycle and pedestrian pathway projected to carry 7,500 bicycle trips per hour — is a world-class, visionary project. The equity framing around communities like West Oakland, where 26% of households lack vehicle access, is exactly the right lens.

However, overall, Plan Bay Area 2050+ treats micro-mobility as a complement to cars and transit rather than as a primary mode in its own right. I urge the Commission and Board to address the following gaps before adoption:

1. NO CYCLING MODAL SHARE TARGET. The plan sets a goal of reducing solo car commuting to 33% by 2050 — but it does not include a headline target for cycling's share of trips. The Netherlands, where 27% of all trips are made by bicycle, achieved that through explicit, enforceable targets. We need the same.

2. FUNDING IS INADEQUATE AND INSECURE. The Netherlands invests approximately $35 per resident per year in cycling infrastructure. The Bay Skyway itself has no identified funding source despite costs in the hundreds of millions. Active transportation deserves a guaranteed, ring-fenced allocation — not discretionary dollars competing against highway interchanges.

3. PAINT IS NOT INFRASTRUCTURE. The plan's "Complete Streets" approach largely retrofits roads with painted bike lanes. The Dutch standard —

physically separated cycling infrastructure on every arterial — is what actually moves the needle on safety and ridership. The Bay Area should adopt that as the design baseline, not the exception.

4. CONNECTIVITY GAPS REMAIN. Isolated showcase projects do not make a network. Amsterdam and Utrecht saw cycling surge, specifically when they built continuous grids connecting homes to schools, shops, and train stations. Plan Bay Area 2050+ is still filling gaps in the Bay Trail rather than building a cohesive regional cycling grid.

Plan Bay Area 2050+ is ambitious by American standards — but American standards are not good enough. I urge MTC and ABAG to raise the bar: add a cycling modal share target, secure dedicated active transportation funding, adopt separated infrastructure as the default design standard, and prioritize network completeness over individual landmark projects.

Thank you for your consideration.

Kevin Rennie
[redacted]
Private Citizen

Outlook

Fw: Final EIR for the PBA 2050+ plan

From MTC-ABAG Info <info@bayareametro.gov>
Date Mon 2026-03-09 12:56 PM
To EIR Comments <eircomments@bayareametro.gov>
Cc Plan BayArea Info <info@planbayarea.org>

Regards,

MTC/ABAG Public Information

From: Bill Mayben [redacted]
Sent: Monday, March 9, 2026 12:40:47 PM
To: MTC-ABAG Info <info@bayareametro.gov>
Subject: Final EIR for the PBA 2050+ plan

External Email

Dear Bay Area Metro Staff;

Thank you for your efforts in producing these documents.
Reading through them, I want to focus briefly on the overarching principle project perimeters.

If we are not planning to decentralize; within
the coming 25 years and beyond we intend to mitigate and adapt Bay Area shoreline and low-lying development and infrastructure to projected Sea Level Rise; in the midst of increasing Severe Climate Events and an increasing population.

We intend to do this while incorporating location and structural engineering principles in preparation for continued Sea Level Rise and Severe Climate Events far beyond 2050.

It appears that this work is driven by our budget, engineering, and schedule to revise all vulnerable existing infrastructure, essentially one time; setting the stage for what is to come. This is necessary to maximize the duration of expensive and time-consuming foundational improvements.

Literally everything proposed hinges on effective SLR mitigation work.

Backup for our population is also dependent on establishing our ability to provide emergency shelter, food, water, sanitation, safety, medical treatment, and transportation; to prevent chaos in Severe Climate Events. Community ability to coordinate and recover is wholly dependent on this.

Presently, many major, parallel societal initiatives are cited. Without effective priority-setting, budgeting, contracting and sequential development, PBA can become chaotic. Given the factors we face, under-promising and over-delivering may be an effective principle.

Lastly, all physical mitigation going forward will be pursued in a progressively deteriorating climate. Over time, development will become more frequently subjected to unprecedented environmental conditions, creating weather and repair setbacks.

Heat, flooding, cold, drought, high winds, high seas will drive some of the coming meteorological, logistical and financial delays.

The locations and access to future critical public services; police, fire, public works, hospitals, electricity and gas, sewage, water, shelter, communication, transportation should be carefully evaluated now, considering all factors.

Yours,
Bill Mayben

Outlook

Re: Response to your Draft Plan Bay Area 2050+ comments

From Jim Stallman [redacted]
Date Mon 2026-03-09 7:54 PM
To Plan BayArea Info <info@planbayarea.org>
Cc [redacted] District5@bos.sccgov.org <District5@bos.sccgov.org>; District1@bos.sccgov.org <District1@bos.sccgov.org>

External Email

Thank you for your reply.

Maybe in spite of MTC, new rail service to the Santa Clara County border with our southern neighbor will commence in 2 years (and someone will figure out that the $80M trainset can also serve Salinas, perhaps). It will cost 10 times what it should and provide economically pitiful levels of service but it is under contract to happen. The service will actually double what we have presently since there is only one trainset and it will have to return to the start to do the second commute trip. Of course, I wouldn't rule out the possibility of the train deadheading without allowing the public who paid for it to ride it. We'll see what happens.

In the meantime, my wife and I continue to submit scofflaw license plates we see to the CHP CHEATERS website to help bolster vehicle fee collections here in the Bay Area. MTC reporting $200M a year lost to uncollectable tolls is real money.

On Mon, Mar 9, 2026 at 1:53 PM Plan BayArea Info <info@planbayarea.org> wrote:

> Dear Mr. Stallman,
>
> Thank you for participating in the Plan Bay Area 2050+ development process. We appreciate your suggestions regarding the Regional Transit Investments map (Map 4-4) and the discussion of future rail connections to Salinas and Monterey County.
>
> Plan Bay Area 2050+ is fiscally constrained and focuses on projects anticipated to become operational within the nine-county San Francisco Bay Area over the 25-year planning horizon. Because the Monterey County Rail Extension Project lies outside the Bay Area's geographic and financial scope, it is not shown on Map 4-4 nor described in the plan at this time.
>
> Regional rail service between the Bay Area and Monterey County is identified in the California State Rail Plan as a long-term vision (generally beyond the plan's 25-year planning horizon). Planning for the Monterey County Rail Extension is currently being led by the Transportation Agency for Monterey County. As project development advances, elements of the project that connect to or operate within the Bay Area may be considered in future Plan Bay Area updates.
>
> Regarding your comment on Capitol Corridor, the South Bay Connect bypass is represented on Map 4-4 under regional rail as "New Service."

Outlook

Re: Response to your Draft Plan Bay Area 2050+ comments

From Ken Kershner [redacted]
Date Tue 2026-03-10 9:02 AM
To Plan BayArea Info <info@planbayarea.org>
Cc SVBC Palo Alto Team <paloalto@bikesiliconvalley.org>; Nash, Betsy <bnash@menlopark.gov>

[redacted] Learn why this is important

External Email

Subject: Re: Plan Bay Area 2050+ – Requesting Specific Language Commitments

Dear Ms. Lara-Enríquez,

Thank you for your thoughtful response. I appreciate MTC-ABAG's acknowledgment of the micromobility sector and the significant investments outlined in Strategies T9 and T10.

However, I want to be direct: the plan's impact will be defined not by its dollar figures, but by its definitions.

$9.4 billion spent on sharrows and painted bike lanes will not move the needle on mode shift. The Netherlands didn't achieve 27% bicycle modal share through encouragement — they mandated physical separation. I urge the final plan to include three specific, enforceable commitments:

1. Define eligibility. T9 funding on arterials over 25 MPH must require Class IV separated infrastructure — not paint.
2. Name micromobility. Include e-bike and e-scooter parking and charging in transit hub funding criteria.
3. Link density to protection. PDAs along El Camino Real should require protected corridor infrastructure as a condition of transportation funding.
4. Set a mode share objective for micromobility trips explicitly.

These are not radical asks — they are the minimum standards needed to deliver on the plan's own stated goals of safety, climate resilience, and equity.

I look forward to engaging further as the final plan is adopted and the next update cycle begins.

Respectfully,
Ken Kershner
[redacted]

On Mon, Mar 9, 2026 at 2:24 PM Plan BayArea Info <info@planbayarea.org> wrote:

Outlook

Formal Opposition to the Adoption of Plan Bay Area 2050+ and the Final EIR

From Brenda Dohmen <[redacted]
Date Wed 2026-03-11 5:05 PM
To Plan BayArea Info <info@planbayarea.org>

You don't often get email from [redacted] Learn why this is important

External Email

Please ensure my email to everyone on these commissions and boards

To: The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG)

Attn: Planning and Administrative Committees

Date: March 11, 2026

Subject: Formal Opposition to the Adoption of Plan Bay Area 2050+ and the Final EIR

To the Members of the Commission and the Executive Board:

I am writing to formally express my strong opposition to the proposed final **Plan Bay Area 2050+** and its associated Environmental Impact Report (EIR). As a long-term resident who has helped build and sustain the Bay Area for decades, I view this plan not as progress, but as a significant misallocation of public funds and a threat to the quality of life of established residents.

My opposition is rooted in the following critical concerns:

- **Misalignment with Demographic Trends:** The push for extreme "densification" and overcrowding ignores current realities. With the ongoing exodus of residents from California and a broader decline in the U.S. population, the fundamental premise that we must radically densify our existing neighborhoods is flawed. There is no demonstrated need for this level of upheaval.
- **Inadequate Transportation Solutions:** While the plan is marketed as a transportation strategy, it fails to address the root cause of our transit woes: the exorbitant and rising costs of construction and operation. Doubling down on high-density projects only serves to enrich developers and the real estate industry while leaving taxpayers to shoulder the growing financial burden of inefficient systems.
- **Lack of Direct Representation:** It is important to note that the residents most impacted by these decisions did not vote for this Commission to represent our specific local interests. This "top-down" approach feels disconnected from the tax-paying citizens who actually live in these communities.
- **Economic Burden on Residents:** For those of us who have invested in this region for years, this plan represents a continuous financial drain. Between the costs of the EIR process itself and the projected long-term costs of implementation, this is an unnecessary burden on the people who have already given the most to this area.

This planning process has been a significant expenditure of time and resources that would have been better spent on practical, cost-effective infrastructure maintenance rather than radical social and architectural engineering.

I urge the MTC and ABAG to reject the certification of the Final EIR and the adoption of Plan Bay Area 2050+ in its current form. We need a plan that respects existing residents, acknowledges current population shifts, and prioritizes fiscal sanity over developer profits.

Sincerely,

Brenda Dohmen

Outlook

Re: Response to your Draft Plan Bay Area 2050+ comments

From David Stahlberg [redacted]
Date Thu 2026-03-12 8:08 AM
To Plan BayArea Info <info@planbayarea.org>

You don't often get email from desertrebbe@yahoo.com. Learn why this is important

External Email

I'm extremely upset to have heard from my union president that ,beginning April 12,2026, there will be no more # 101's running north of Novato into Sonoma County. This will place an extra burden on so many people especially, since gasoline prices are about to go through the roof. Shortsighted planning to put it mildly. Heartbreaking, to be honest.

On Mar 9, 2026, at 2:25 PM, Plan BayArea Info <info@planbayarea.org> wrote:

Dear Mr. Stahlberg,

Thank you for taking the time to provide comments on Draft Plan Bay Area 2050+. Your insights and concerns are greatly appreciated and were carefully considered by MTC-ABAG planning staff in determining refinements to the plan and accompanying reports.

The plan includes strategies to increase access to transit for residents and visitors across the region, including additional trips on Golden Gate Transit and operators in Sonoma County. The plan also includes the extension of SMART service to Healdsburg and Cloverdale to improve transit access in northern Sonoma County.

The need to expand transit services late at night and earlier in the morning is something we heard during public engagement for Transit 2050+ and Plan Bay Area 2050+. To comply with federal requirements, the projected costs of future investments cannot exceed our anticipated revenues over the course of the plan timeline. Because of this, it is not feasible to expand 24-hour service to the entire region, and it is not currently planned in Marin and Sonoma Counties. However, we continue to invest in 24-hour service in the more urbanized portions of the region, as well as expanding service hours throughout the region. Further increases to 24-hour service could be considered in a future plan.

Thank you again for your thoughtful comments. We hope you will stay involved in the regional planning process as we kick off the next plan update later this year.

Read the proposed final Plan Bay Area 2050+ and its supplemental reports at planbayarea.org/finalplan. The Final EIR for Plan Bay Area 2050+ also can be accessed online at planbayarea.org/2050/environmental-impact-report-eir.

Outlook

Re: Response to your Draft Plan Bay Area 2050+ comments

From Bill Mayben [redacted]
Date Thu 2026-03-12 1:28 PM
To Plan BayArea Info <info@planbayarea.org>

External Email

Dear Ms. Lara-Enriquez,

Thank you for your reply.

The 'Bins' you described are at the heart of my fear of dissolution of our core concerns; that the responsibility for physical sea level rise mitigation and adaptation construction can become lost in multi- jurisdictional agenda.

We want to permanently avoid flooding; all around the Bay.

The term "Exponential" in climate change is key. Humans think incrementally. Our global climate threat is increasing exponentially.

Most believe, based on their past experience, that we have much more time than we actually do.

We are, in fact, Bay Area wide; setting the stage for a sweeping, ongoing shift in our reality; while proposing to conduct business as usual in its midst.

While we have some preliminary studies; we apparently do not have a complete plan that allows us to confidently project even a rough start date for physical mitigation and adaptation work. Certain activities can proceed in parallel; others simply cannot.

If you were to reference preliminary flow charts of all the processes leading to the completion of entitlements; I will bet you find the main construction phase falling close to the shadow of Severe Climate Events.

That alone means delays and repairs. Costs.

The Final EIR cites a number of interdependent goals. A recitation of priorities and logistical sequence of events should help clear the air.

You may consider an empowered central, core construction project management; the success upon which each and every aspect depends.

There are preliminary accommodations; various stake-holder jurisdictions, permits, insurance, finance, multiple bidding and contract processes, laws and rules, access, traffic control, temporary facilities,

engineering, spoils removal, demolition, infrastructure relocation, new drainage systems, and more; on towards primary construction.

The tail end of 24 years from now will likely be progressively subject to climate related potential delays and repairs. We would prefer avoiding those.

I previously forwarded recent information from studies indicating that worldwide sea level calculations are off. Our 2050 effects could be 1-3' higher than we now project. There will be more surprises; so contingency planning is foremost.

Preliminary duration schedules from each "entity" could conceivably
sequence a preliminary calendar; identify issues, and allow for periodic updates.

I am confident this is being done.

Yours,
Bill Mayben

On Mar 9, 2026, at 2:27 PM, Plan BayArea Info <info@planbayarea.org> wrote:

Dear Mr. Mayben,

Thank you for sharing your thoughtful and detailed comments. We share many of your concerns about the significant fiscal, environmental and governance challenges the Bay Area faces.

We recognize that we are not operating within the same political or fiscal framework as the region's transportation strategies, which are constrained by specific funding allocations and regulatory frameworks. To begin addressing this, this plan categorizes estimated costs into broad "bins," which will help refine the scale of investment needed and highlight where new funding sources or mechanisms must be developed.

This plan is only the beginning of a longer, collaborative process with regional, local and state partners to refine the analysis and align on funding and implementation pathways to get projects built.

Plan Bay Area 2050+ aims to hold multiple concurrent risks in view, acknowledging that sea level rise is only one of several major regional challenges. Severe earthquakes, floods, wildfires, droughts, and periods of extreme heat or cold each pose unique risks to

Attachment B: Plan Bay Area 2050+ Handout Summarizing Comments Received in March 2026

The table below summarizes comments received following the release of the proposed Final Plan Bay Area 2050+ and the Final Environmental Impact Report for Plan Bay Area 2050+ **between 5:00 p.m. on Thursday, March 12, 2026, and 5:00 p.m. on Wednesday, March 18, 2026.**

#	Commenter / Date	Topics	Summary of Comments
1	**David Stahlberg** 03/13/2026 (7:53 a.m.)	Public Transit Service and Bus Operations	The commenter states that rising gasoline prices may increase demand for public transportation and emphasize the importance of maintaining reliable, affordable and frequent bus service.

Attachment:

- Comments received between 5:00 p.m. on March 12, 2026, and 5:00 p.m. on March 18, 2026

Outlook

Re: Response to your Draft Plan Bay Area 2050+ comments

From David Stahlberg [redacted]
Date Fri 2026-03-13 7:53 AM
To Plan BayArea Info <info@planbayarea.org>

You don't often get email from [redacted] Learn why this is important

External Email

A final thought on your plan; gasoline prices will continue to rise as the war goes on. This will most likely, cause people to rethink using public transportation. A reliable,affordable,clean and frequent bus system would only aid those in need to get around the county and into SF. Golden Gate Transit has been offering this service for decades. If possible let's keep these hard working men and women behind the wheel doing what they do best. The Bay Area deserves it's place in America's transportation infrastructure.

> On Mar 9, 2026, at 2:25 PM, Plan BayArea Info <info@planbayarea.org> wrote:
>
> Dear Mr. Stahlberg,
>
> Thank you for taking the time to provide comments on Draft Plan Bay Area 2050+. Your insights and concerns are greatly appreciated and were carefully considered by MTC-ABAG planning staff in determining refinements to the plan and accompanying reports.
>
> The plan includes strategies to increase access to transit for residents and visitors across the region, including additional trips on Golden Gate Transit and operators in Sonoma County. The plan also includes the extension of SMART service to Healdsburg and Cloverdale to improve transit access in northern Sonoma County.
>
> The need to expand transit services late at night and earlier in the morning is something we heard during public engagement for Transit 2050+ and Plan Bay Area 2050+. To comply with federal requirements, the projected costs of future investments cannot exceed our anticipated revenues over the course of the plan timeline. Because of this, it is not feasible to expand 24-hour service to the entire region, and it is not currently planned in Marin and Sonoma Counties. However, we continue to invest in 24-hour service in the more urbanized portions of the region, as well as expanding service hours throughout the region. Further increases to 24-hour service could be considered in a future plan.
>
> Thank you again for your thoughtful comments. We hope you will stay involved in the regional planning process as we kick off the next plan update later this year.

Attachment C: Plan Bay Area 2050+ Handout

Summarizing Comments Received in March 2026

The table below summarizes comments received following the release of the proposed final Plan Bay Area 2050+ and the Final Environmental Impact Report for Plan Bay Area 2050+ **between 5:00 p.m. on Wednesday, March 18, 2026, and 5:00 p.m. on Tuesday, March 26, 2026.**

#	Commenter / Date	Topics	Summary of Comments
1	**Jason Bezis c/o TRANSDEF** 03/24/2026 (12:58 p.m.)	Active Transportation / Micromobility	The commenter calls for the immediate removal of the Valley Link project (RTPID 25-T12-177) from the Final Plan Bay Area 2050+ Regional Transportation Plan (proposed MTC Resolution No. 4750) because the project fails to conform with MTC's Regional Transit Expansion policy (Resolution No. 3434).

Attachment:

- Comments received between 5 p.m. on March 18, 2026, and 5:00 p.m. on March 24, 2026

Outlook

Metropolitan Transportation Commission Meeting of March 25, 2026 - Agenda Item 10d - Approval of Final Plan Bay Area 2050+

From Jason Bezis [redacted]
Date Tue 2026-03-24 12:58 PM
To MTC-ABAG Info <info@bayareametro.gov>
Cc Plan BayArea Info <info@planbayarea.org>; Kimberly Ward <KWard@bayareametro.gov>; Kathleen Kane <kkane@bayareametro.gov>; Andrew Fremier <AFremier@bayareametro.gov>

1 attachment (293 KB)
TRANSDEF Request to Remove Valley Link Project from PBA2050+ RTP-March 24 2026.pdf;

External Email

Ms. Kimberly Ward
Clerk of MTC

Dear Ms. Ward and office of the Clerk of MTC:

This office represents the Transportation Solutions Defense and Education Fund (TRANSDEF). TRANSDEF submits the attached PDF document (one page) as public comment for the MTC meeting of March 25, 2026, Item 10d, approval of the Final Plan Bay Area 2050+. In accordance with the meeting agenda, TRANSDEF submits this public comment letter before 5:00 p.m. the business day before the March 25 meeting. Please circulate the attached letter to MTC commissioners. TRANSDEF requests a substantive response to the issues raised within the attached letter.

Please confirm receipt of the attached PDF document.

Respectfully submitted,
Jason Bezis
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Attorney for TRANSDEF
[redacted]

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[redacted]

March 24, 2026

VIA E-MAIL ONLY

Chair Sue Noack and Commissioners
METROPOLITAN TRANSPORTATION COMMISSION
info@bayareametro.gov

Re: Removal of Valley Link Project from Regional Transportation Plan (25-T12-177)
MTC Meeting, March 25, 2026, Agenda Item 10d
(Adoption of MTC Resolution No. 4750 approval the Final Plan Bay Area 2050+)

To Chair Noack and Commissioners:

This office represents the Transportation Solutions Defense and Education Fund (TRANSDEF). TRANSDEF calls for the immediate removal of the Valley Link project (RTPID 25-T12-177) from the Final Plan Bay Area 2050+ Regional Transportation Plan ("PBA2050+ RTP"), proposed MTC Resolution No. 4750, because it fails to conform with MTC's Regional Transit Expansion policy (Resolution No. 3434).

MTC Resolution No. 3434, Attachment D, "Terms and Conditions," states, "Operating Funding – In order for an extension of service to be included in the Regional Transportation Plan (RTP), the project sponsor must provide evidence of its ability to fund operation of the service for a minimum of 10 years, or the duration of operations within the 25-year RTP time horizon, whichever is longer."

The PBA2050+ RTP project list states for the Valley Link project: "Operating Cost (YOE, $millions) $679." The project sponsor, the Tri-Valley-San Joaquin Valley Regional Rail Authority, has not provided evidence of its ability to fund operation of the service for the requisite time period. The sponsor has no viable plan to cover that operating cost. The Bay Area cannot afford to operate existing public transit systems, let alone operate Valley Link, as evidenced by MTC's advocacy for SB 63 and the Connect Bay Area Transit tax increase. On this basis, you must remove the Valley Link project from the RTP.

TRANSDEF notes that MTC commissioners and administrators who approve inclusion of the Valley Link project in the PBA2050+ RTP could incur personal liability under Code of Civil Procedure section 526a for their approval of this project, which clearly cannot be included in the RTP under MTC Resolution No. 3434. A reasonable MTC commissioner or administrator, exercising due care, would investigate, analyze, and debate the Valley Link project's compliance with the "Operating Funding" "Terms and Conditions" in Resolution No. 3434 before approving Resolution No. 4750.

Respectfully submitted,

/s/ *Jason A. Bezis*
JASON A. BEZIS
Attorney for TRANSDEF

Attachment D: Plan Bay Area 2050+ Handout

Summarizing Comments Received in March 2026

The table below summarizes comments received following the release of the proposed final Plan Bay Area 2050+ and the Final Environmental Impact Report for Plan Bay Area 2050+ **between 5:00 p.m. on Tuesday, March 24, 2026, and meeting start time.**

#	Commenter / Date	Topics	Summary of Comments
1	**Bill Mayben** 03/24/2026 (7:31 p.m.)	State of the Global Climate 2025	The commenter sent a link to the World Meteorological Organization 2025 State of the Global Climate report.

Attachment:

- Comment received between 5 p.m. on March 24, 2026, and meeting start time.

Outlook

Fw: State of the Global Climate 2025

From Plan BayArea Info <info@planbayarea.org>
Date Wed 3/25/2026 9:04 AM
To Vanessa Smith <vsmith@bayareametro.gov>; Veronica Cummings <vcummings@bayareametro.gov>

Get Outlook for iOS

From: Bill Mayben <bmayben@comcast.net>
Sent: Tuesday, March 24, 2026 7:31:10 PM
To: Plan BayArea Info <info@planbayarea.org>
Subject: State of the Global Climate 2025

External Email

Dear PBA Staff,

This represents a nexus of current global climate facts. This is the primary report and there is a summary. Worth the read!

Bill Mayben

https://library.wmo.int/records/item/69807-state-of-the-global-climate-2025

375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0381, **Version:** 1

Subject:
MTC Resolution No. 4748. Transportation Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program

Adoption of MTC Resolution No. 4748 approving the Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program (TIP).

Presenter:
Dave Vautin

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

MTC Planning Committee

March 13, 2026 **Agenda Item 8b**

MTC Resolution No. 4748. Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program

Subject:

Request referral of MTC Resolution No. 4748. Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program to the Commission for approval.

Background:

Federal regulations under the Clean Air Act require Metropolitan Planning Organizations to demonstrate that their long-range transportation plans and short-range transportation funding programs will not worsen air quality or interfere with attainment or maintenance of the National Ambient Air Quality Standards (NAAQS). This requirement, known as transportation conformity, applies to Plan Bay Area 2050+ (the "plan") and the Amended 2025 Transportation Improvement Program (the "TIP").

In the Bay Area, transportation conformity applies to pollutants for which the region does not meet federal air quality standards—specifically ground-level ozone and fine particulate matter ($PM_{2.5}$). Conformity is demonstrated by showing that emissions from implementation of the plan and TIP are consistent with the region's federally approved air quality plan, known as the State Implementation Plan (SIP), prior to approval.

MTC conducted a transportation conformity analysis for the plan and TIP in accordance with U.S. Environmental Protection Agency (EPA) transportation conformity regulations and the EPA-approved Bay Area transportation conformity SIP, as implemented through the Bay Area Air Quality Conformity Protocol (MTC Resolution No. 3757). The analysis used the latest planning assumptions and EPA-approved models to estimate future travel activity and motor vehicle emissions.

Regional travel forecasts were developed in spring 2025 using MTC's Travel Model (Version 1.6.1), and emissions were estimated in fall 2025 using the California Air Resources Board's EMission FACtor model (EMFAC2021 version 1.0.2) with EPA-approved CARB adjustment factors. Ozone conformity was evaluated using the emissions budget test based on the 2001 Ozone Attainment Plan, and $PM_{2.5}$ conformity was evaluated using the baseline interim emissions test, which compares projected emissions to 2008 baseline levels.

Development of the conformity analysis was informed by ongoing interagency consultation with the Air Quality Conformity Task Force, which includes representatives from the U.S. EPA, Federal Highway Administration, Federal Transit Administration, Caltrans, and the Bay Area Air District. The Task Force reviewed the analysis methodology, assumptions, and draft findings during meetings held in October and December 2025.

The draft conformity analysis was released for a 30-day public review and comment period from December 22, 2025, through January 21, 2026, and was made available online. MTC received five comment letters during the public comment period. One comment addressed the scope and documentation of the conformity analysis, while the remaining comments raised broader policy or planning issues outside the scope of the federal transportation conformity process. The Task Force reviewed public comments in January 2026 and reviewed the final conformity analysis in February 2026. All Task Force meetings were conducted remotely and were open to the public.

Findings

Based on the transportation conformity analysis, interagency consultation, and public review process, MTC finds that implementation of Plan Bay Area 2050+ and the Amended 2025 TIP meets all applicable federal transportation conformity requirements. The analysis demonstrates that the plan and TIP will not cause new air quality violations, worsen existing violations, or delay attainment of the NAAQs.

Accordingly, the following transportation conformity findings are made for the plan and the Amended 2025 TIP:

(A) Conforms to the applicable provisions of the SIP and the applicable transportation conformity budgets in the SIP approved for the national 8-hour ozone standard and to the interim conformity emissions test for the national fine particulate matter standard; and

(B) Provides for the timely implementation of transportation control measures (TCMs) pursuant to the applicable SIP.

Recommendation:

Staff requests that the MTC Planning Committee find Plan Bay Area 2050+ and the Amended 2025 TIP to be in conformance with the applicable federal air quality plan for ground-level ozone and fine particulate matter (PM2.5) and refer MTC Resolution No. 4748 to the Commission for approval.

Issues:

None identified.

Attachments:

- MTC Resolution No. 4748
  - Attachment A

Andrew B. Fremier

Date: March 25, 2026
W.I.: 1412
Referred by: Planning

ABSTRACT

Resolution No. 4748

This resolution finds that the Final Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program are in conformance with the State Implementation Plan to achieve National Ambient Air Quality Standards.

Further discussion of this subject is contained in the Planning Committee Summary Sheet dated March 13, 2026.

Date: March 25, 2026
W.I.: 1412
Referred by: Planning

Re: Approval of the Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program (TIP) to demonstrate conformity for the 2015 Ozone and 2006 24-hour $PM_{2.5}$ National Ambient Air Quality Standards (NAAQS)

METROPOLITAN TRANSPORTATION COMMISSION

RESOLUTION NO. 4748

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to California Government Code Section 66500 et seq.; and

WHEREAS, MTC is the federally designated Metropolitan Planning Organization (MPO), pursuant to Section 134(d) of Title 23 of the United States Code (USC) for the nine-county San Francisco Bay Area region (the region); and

WHEREAS, Part 450 of Title 23 of the Code of Federal Regulations (CFR), requires MTC as the MPO to prepare and update a long-range Regional Transportation Plan (RTP) every four years; and

WHEREAS, California Government Code § 65080 *et seq*. (Senate Bill 375) requires MTC to prepare and update a long-range RTP, including a Sustainable Communities Strategy (SCS) prepared in conjunction with the Association of Bay Area Governments (ABAG), every four years; and

WHEREAS, MTC has prepared Plan Bay Area 2050+ ("Plan"), which is subject to the approval of MTC and ABAG under separate action (MTC Resolution No. 4750 and ABAG Resolution No. 02-2026); and

WHEREAS, 23 CFR §450 requires MTC to prepare and update a Transportation Improvement Program (TIP) consisting of a comprehensive listing of transportation projects that

receive federal funds, are subject to a federally required action, or are regionally significant, every four years; and

WHEREAS, the 2025 TIP, consistent with federal and state requirements, was adopted by MTC on September 25, 2024, (MTC Resolution No. 4646) and approved by the State on November 15, 2024, and jointly by the Federal Highway Administration and Federal Transit Administration on December 16, 2024; and

WHEREAS, subsequent revisions to the 2025 TIP ("Amended TIP") have been approved by MTC and incorporated in accordance with applicable State and Federal requirements; and

WHEREAS, the Plan and the Amended TIP must conform to the federal air quality plan, which is also referred to as the State Implementation Plan (SIP); in accordance with the federal Clean Air Act and U.S. Environmental Protection Agency (U.S. EPA) transportation conformity regulations; and

WHEREAS, the San Francisco Bay Area air basin is designated nonattainment by U.S. EPA for the 2015 Ozone National Ambient Air Quality Standards (NAAQS), and the applicable SIP includes approved motor vehicle emissions budgets for ozone precursors; and

WHEREAS, the San Francisco Bay Area air basin is designated nonattainment by U.S. EPA for the 2006 24-hour fine particulate matter (PM2.5) NAAQS, effective December 2009; and

WHEREAS, because a PM2.5 SIP with approved motor vehicle emissions budgets has not yet been approved by U.S. EPA, the region is required to demonstrate conformity for the PM2.5 NAAQS using an interim emissions test; and

WHEREAS, MTC prepared a transportation-air quality conformity analysis for the Plan and Amended TIP in accordance with U.S. EPA conformity regulations and the Bay Area Air Quality Conformity Protocol (MTC Resolution No. 3757), which is entitled "Plan Bay Area

2050+ Transportation-Air Quality Conformity Report" ("Conformity Analysis") (attached hereto as Attachment A and incorporated herein as though set forth at length); and

WHEREAS, the Conformity Analysis demonstrates conformity with the SIP for the 2015 Ozone NAAQS by satisfying all applicable U.S. EPA transportation-air quality conformity requirements and approved emissions budgets; and

WHEREAS, the Conformity Analysis demonstrates conformity with the 2006 24-hour PM2.5 NAAQS by satisfying all applicable U.S. EPA transportation-air quality conformity requirements and interim emissions test requirements; and

WHEREAS, the draft Conformity Analysis has been circulated for a required 30-day public review period from December 22, 2025, through January 21, 2026; now, therefore be it

RESOLVED, that MTC makes the following conformity findings for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program:

(A) Conforms to the applicable provisions of the State Implementation Plan and the applicable transportation conformity budgets in the State Implementation Plan approved for the national 8-hour ozone standard and to the interim conformity emissions test for the national fine particulate matter standard; and
(B) Provides for the timely implementation of transportation control measures (TCMs) pursuant to the applicable State Implementation Plan;

RESOLVED, that Executive Director shall forward a copy of this Resolution to the U.S. Department of Transportation for its approval of MTC's conformity findings, along with a copy of Plan Bay Area 2050+ and to such other agencies as appropriate.

METROPOLITAN TRANSPORTATION COMMISSION

Sue Noack, Chair

This resolution was entered into by the
Metropolitan Transportation Commission at a
meeting of the Commission held in
San Francisco, California and at other
remote locations on March 25, 2026.

Date: March 25, 2026
W.I.: 1412
Referred by: Planning

Attachment A
Resolution No. 4748
Page 1 of 1

Transportation-Air Quality Conformity Analysis for
Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program

The Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program is on file in the offices of the Metropolitan Transportation Commission, Bay Area Metro Center, 375 Beale Street, Suite 800, San Francisco, CA 94105.

The Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and the Amended 2025 Transportation Improvement Program can also be viewed online at https://planbayarea.org/finalplan.

PLAN BAY AREA 2050+

TRANSPORTATION-AIR QUALITY CONFORMITY REPORT

MARCH 2026

ASSOCIATION OF BAY AREA GOVERNMENTS

METROPOLITAN TRANSPORTATION COMMISSION

Metropolitan Transportation Commission

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Plan Bay Area 2050+:
Transportation-Air Quality Conformity Report

If you require this document in a different format, please contact the MTC-ABAG Public Information Office at info@bayareametro.gov or call (415) 778-6757 for assistance.

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Executive Summary

This report presents the initial transportation conformity determination for the San Francisco Bay Area's long-range regional plan — Plan Bay Area 2050+ — and the Transportation Improvement Program (Amended 2025 TIP), prepared by the Metropolitan Transportation Commission (MTC). The analysis shows that the long-range regional plan and TIP meet all applicable air quality requirements under the federal Clean Air Act and U.S. Environmental Protection Agency (EPA) regulations.

Transportation conformity ensures that regional transportation activities do not interfere with efforts to meet or maintain the National Ambient Air Quality Standards. For MTC, transportation conformity applies to pollutants for which the Bay Area Air Basin is designated nonattainment — specifically, ground-level ozone and fine particulate matter (PM2.5). This analysis evaluates emissions from implementation of the long-range regional plan and TIP, including implementation of all regionally significant and non-exempt transportation projects.

The analysis follows procedures established in the EPA-approved Bay Area transportation conformity State Implementation Plan (SIP) and was carried out in consultation with the Bay Area Air District, California Air Resources Board, Caltrans, EPA, Federal Highway Administration and Federal Transit Administration.

MTC developed the initial framework for this analysis in July 2023, using the latest planning assumptions and EPA-approved models to estimate future travel activity and vehicle emissions. Travel activity forecasts were generated in spring 2025 using MTC's Travel Model 1.6, and emissions were estimated in EMFAC2021 with EPA-approved adjustment factors in November 2025. For ozone, transportation conformity was tested using the emissions budget test based on the 2001 Ozone Attainment Plan. For PM2.5, transportation conformity was tested using the baseline interim emissions test, comparing projected emissions to 2008 baseline levels.

Key Findings:

- **Ground-Level Ozone** — Modeled regional emissions of volatile organic compounds (VOC) and nitrogen oxides (NOx), under summertime conditions, are below the SIP budgets for all analysis years (2030, 2040 and 2050).
- **PM2.5** — Modeled regional emissions of direct PM2.5 and NOx, under wintertime conditions, are below the 2008 baseline levels for all analysis years (2030, 2040 and 2050).

All Transportation Control Measure commitments in the 2001 Ozone Attainment Plan have been fully implemented, and this analysis reflects the most up-to-date data, models, and assumptions reviewed through interagency consultation.

Conclusion: Based on this analysis, Plan Bay Area 2050+ and the Amended 2025 TIP conform to the SIP. The Bay Area meets federal transportation conformity requirements for ozone and PM2.5, confirming that regional transportation activities support both mobility and clean air goals.

Introduction

This report documents the transportation-air quality conformity analysis for the San Francisco Bay Area's long-range regional plan — Plan Bay Area 2050+ — and Transportation Improvement Program (Amended 2025 TIP). The analysis demonstrates that the Metropolitan Transportation Commission (MTC) meets all federal requirements under the Clean Air Act (CAA) and the U.S. Environmental Protection Agency's (EPA) Transportation Conformity Rule. Conformity ensures that implementing transportation strategies, projects and programs within a long-range regional plan and TIP will not cause new air quality violations, worsen existing violations, or delay timely attainment of the National Ambient Air Quality Standards (NAAQS).

MTC prepared this transportation conformity determination in conjunction with the adoption of Plan Bay Area 2050+ and reaffirms conformity for the Amended 2025 TIP, which programs federally funded and regionally significant transportation projects, including those needing National Environmental Policy Act (NEPA) approvals.

MTC prepares and adopts the initial conformity determination in consultation with the Bay Area Air District, California Air Resources Board (CARB), California Department of Transportation (Caltrans), and federal partners including the Federal Highway Administration (FHWA), Federal Transit Administration (FTA) and EPA. Following MTC action, FHWA and FTA — acting on behalf of the U.S. Department of Transportation (U.S. DOT) — review and issue the final federal transportation conformity determination. Only after this federal determination is issued may U.S. DOT fund, authorize or approve regionally significant or non-exempt transportation projects included in the long-range regional plan or TIP.

The most recent regional transportation conformity determination was issued jointly by FHWA and FTA on March 27, 2025, for the amended Plan Bay Area 2050 and 2025 TIP. Prior to this federal action, MTC approved the associated regional transportation conformity analysis, made an initial conformity determination (MTC Resolution No. 4665), and adopted the amended Plan Bay Area 2050 (MTC Resolution No. 4667).

Regulatory Framework

Transportation conformity is implemented through a coordinated federal, state and regional regulatory structure. This section outlines the key legal and procedural requirements governing transportation conformity in the Bay Area, including federal CAA provisions, EPA regulations, and state and regional conformity procedures adopted by MTC and its partner agencies.

Transportation Conformity

Transportation conformity is a federal CAA requirement that links transportation and air quality planning. It ensures that federal transportation plans, programs, and projects conform to the State Implementation Plan (SIP) for achieving and maintaining the NAAQS.

Conformity applies in areas designated by EPA as nonattainment, where air quality does not meet the NAAQS, or as maintenance areas, where air quality has improved but must continue to meet the standards. Within these areas, federally funded or approved transportation plans, programs and projects must be consistent with applicable SIP elements for the relevant pollutants.

A conformity determination is required at least once every four years, or whenever a Metropolitan Planning Organization (MPO), such as MTC, adopts a new long-range regional plan or TIP, or amends either in a way that adds or revises a regionally significant or non-exempt transportation project.

This conformity determination demonstrates that the implementation of the transportation strategies, projects and programs included in the long-range regional plan and TIP will not:

- Cause or contribute to new violations of air quality standards;
- Increase the frequency or severity of existing violations; or
- Delay timely attainment of the NAAQS.

This conformity determination follows the procedures and criteria established in:

- The Clean Air Act (as amended in 1990);
- The EPA Transportation Conformity Rule (40 CFR Part 93, Subpart A);
- The EPA-approved San Francisco Bay Area 2001 Ozone Attainment Plan (2001 Plan);
- The EPA-approved San Francisco Bay Area Transportation Air Quality Conformity Protocol (adopted under MTC Resolution No. 3757); and,
- Guidance from Caltrans, CARB, FHWA and FTA.

Bay Area Procedures and Governance

The San Francisco Bay Area Transportation Air Quality Conformity Protocol (“Conformity SIP”) establishes the procedures for implementing federal transportation conformity requirements under the CAA. First adopted in 1994 to comply with the 1990 CAA Amendments, the Conformity SIP defined the interagency consultation and conformity procedures to demonstrate conformance with the SIP.

The Conformity SIP has been periodically updated to reflect changes in federal and state requirements and to strengthen regional coordination. The most recent version — adopted jointly by MTC, Association of Bay Area Governments (ABAG), and the Bay Area Air District — was approved by EPA on December 28, 2023 (EPA–R09–OAR–2023–0203) and became effective on January 29, 2024.

Under the Conformity SIP, MTC must adhere to specific interagency consultation and conformity procedures to conduct regional emissions analyses and coordinate reviews with the Bay Area Air District, CARB, and federal partners (EPA, FHWA, and FTA). The Conformity SIP specifies agency roles and responsibilities, consultation and conflict-resolution processes, and requirements for timely implementation of Transportation Control Measures (TCMs). It also requires that conformity analyses use the latest planning assumptions and EPA-approved emissions models.

MTC may not adopt or approve any transportation plan, program or project that does not conform to the SIP:

- A plan refers to the long-range regional plan (Plan Bay Area 2050+).
- A program refers to the TIP (2025 TIP).
- A project includes all regionally significant projects, as well as any non-exempt highway or transit improvement requiring FHWA or FTA approval or funding.

National Ambient Air Quality Standards

One of the original goals of the CAA was to establish and achieve the NAAQS nationwide to protect public health from the effects of air pollution. EPA sets these standards for six principal ("criteria") pollutants[1] that pose risks to human health and the environment:

- Ground-Level Ozone (O3);
- Particulate Matter (PM2.5 and PM10);
- Carbon Monoxide (CO);
- Nitrogen Oxides (NOx);
- Lead (Pb); and
- Sulfur Oxides (SOx).

EPA establishes exposure limits for each pollutant based on extensive, peer-reviewed scientific research, and periodically reviews and updates these standards. When new or revised standards are issued, EPA evaluates regional air quality monitoring data and designates whether each region meets, does not meet, or has previously violated and now meets the standard. Regions may be classified as:

- **Attainment or unclassifiable**, meaning they meet the standard;
- **Nonattainment**, meaning they do not meet the standard; or

[1] For information on each pollutant, see https://www.epa.gov/criteria-air-pollutants/information-pollutant

- **Maintenance**, meaning they previously violated a standard but now meet it and must ensure continued compliance.

Federal law requires areas designated nonattainment by EPA to prepare comprehensive plans describing how they will attain and maintain compliance with the applicable standard. These plans are known as SIPs. A SIP is not a single document, but rather a collection of regional and pollutant-specific plans that together form a comprehensive, statewide framework for air quality management.

Each SIP is tailored to address specific pollutants and air quality needs within a given region. While all SIPs rely on a combination of federal, state and local measures, the specific components — such as district rules, enforceable control measures, motor vehicle emissions budgets, or TCMs — are included only when necessary to demonstrate attainment or maintenance of a standard.

In California, CARB serves as the lead agency for the SIP. In the Bay Area, the Bay Area Air District, in coordination with MTC and ABAG, develops the regional SIP elements, which CARB then reviews, adopts and submits to EPA for approval.

Bay Area Air Pollutant Designations

Transportation conformity in the Bay Area applies to the geographic area designated by EPA as nonattainment or maintenance for one or more pollutants. This Bay Area Air District jurisdiction — referred to as the Bay Area Air Basin — includes all of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo and Santa Clara Counties, as well as portions of Solano and Sonoma Counties, as shown in Figure 1. This conformity area differs slightly from the MTC regional planning area covered in the long-range regional plan and TIP, which includes the same nine counties in their entirety.

Within the Bay Area Air Basin, the EPA has made the following nonattainment designations for transportation-related pollutants, summarized in Table 1:

- **Ground-level Ozone**, Nonattainment under the 2008 and 2015 8-hour standards
- **Particulate Matter (PM2.5)**, Nonattainment under the 24-hour standard

Transportation conformity for carbon monoxide (CO) is no longer required in the Bay Area. The Bay Area Air Basin was redesignated to CO attainment effective April 9, 1998 (63 FR 16205), with an EPA-approved maintenance plan covering a 20-year period through June 1, 2018. The Bay Area maintained compliance with the 8-hour standard during that time, ending transportation conformity requirements.

Ozone (2008 and 2015, 8-Hour Standard)

EPA first established the 8-hour ground-level ozone standard in 1997 at 0.08 parts per million (ppm), replacing the previous 1-hour ozone standard. The Bay Area was designated nonattainment for the 1997 standard effective June 15, 2004 (69 FR 23858). EPA later strengthened the 8-hour standard to 0.075 ppm in 2008 and to 0.070 ppm in 2015 to provide greater public health protection. Based on recommendations from CARB, EPA finalized area designations for the 2015 standard on June 4, 2018, classifying the Bay Area Air Basin as marginal nonattainment, effective

August 3, 2018 (83 FR 25776). The Bay Area Air Basin remains **designated marginal nonattainment** for both the 2008 and 2015 8-hour ground-level ozone standards.

PM2.5 (2006, 24-Hour Standard)

EPA first established the standard for fine particulate matter (PM2.5) in 1997, setting a 24-hour standard of 65 micrograms per cubic meter (μg/m^3) and an annual standard of 15 μg/m^3. The 24-hour standard was strengthened to 35 μg/m^3 in 2006 to provide additional public health protection. Based on monitoring data from 2007–2009, EPA designated the Bay Area Air Basin as nonattainment for the 2006 24-hour PM2.5 standard, effective December 14, 2009 (74 FR 58688).

On January 9, 2013, EPA determined that the Bay Area attains the 24-hour PM2.5 standard (78 FR 1760). This clean data determination suspended additional SIP planning requirements, such as the need for an attainment demonstration or new on-road motor vehicle emissions budgets, while the region continues to meet the standard. The Bay Area Air Basin remains formally designated **moderate nonattainment** for the 2006 24-hour PM2.5 standard until a redesignation request and maintenance plan are approved by EPA.

EPA revised the annual PM2.5 standard to 12.0 μg/m^3 in 2012, for which the Bay Area Air Basin was designated unclassifiable/attainment, effective April 15, 2015 (80 FR 2206). In February 2024, EPA further strengthened the annual PM2.5 standard to 9.0 μg/m^3 to enhance protection of public health; this progress was challenged in November 2025 when EPA filed a motion with the U.S. Court of Appeals to vacate the 2024 annual PM2.5 standard and revert to the 2012 annual standard of 12.0 μg/m^3. If the 2024 rule stays in effect, area designations under the revised standard are expected in early 2026.

Figure 1: Map of Bay Area Transportation Conformity Area

Regional Plans, Programs, and TCMs

Transportation conformity applies to the long-range regional plan, TIP, and applicable TCMs in the SIP. The long-range regional plan, TIP and TCMs provide the basis for the emissions analysis and conformity determination.

Plan Bay Area 2050+

Plan Bay Area 2050+ is the Bay Area's long-range regional plan, serving as the Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), as required under federal and state law. It is anticipated to be adopted jointly by MTC and ABAG in early 2026. The plan presents an integrated strategy across four elements — transportation, housing, the economy, and the environment — outlining 35 coordinated strategies that provide a blueprint for accommodating future growth and making the Bay Area more equitable and resilient through 2050.

The Plan Bay Area 2050+ Transportation Element is organized around three themes and twelve strategies, through which transportation projects and programs are prioritized for implementation, consistent with the revenues identified in the plan's transportation revenue forecast. The forecast includes both existing and new reasonably expected revenues from federal, state, regional and local sources through 2050.

The Plan Bay Area 2050+ Transportation Project List translates this long-range vision into a specific set of prioritized transportation investments expected to open by 2050. Project costs are shown in year-of-expenditure dollars and do not exceed the transportation revenue forecast. The list identifies projects and programs eligible to advance through funding and regulatory processes, including all regionally significant and non-exempt projects subject to transportation conformity.

As required by federal and state regulations, Plan Bay Area 2050+ covers a minimum 20-year planning horizon, is updated every four years, and demonstrates fiscal constraint. The plan also fulfills the requirements of California Senate Bill 375 (Steinberg, 2008) by integrating transportation and land use strategies to reduce greenhouse gas (GHG) emissions from cars and light-duty trucks, consistent with reduction targets established by CARB.

Transportation Improvement Program

The TIP is a four-year, fiscally constrained programming document that identifies near-term surface transportation investments in the San Franciso Bay Area. It includes projects that receive federal funds, require federal approvals, or are classified as regionally significant. The Amended 2025 TIP covers fiscal years 2024–25 through 2027–28 and primarily consists of projects carried forward from the Amended 2023 TIP. MTC approved the 2025 TIP and the Transportation–Air Quality Conformity Analysis for the 2025 TIP on September 25, 2024. The TIP has since been revised through subsequent amendments and administrative modifications in accordance with the relevant procedures (Amended 2025 TIP).

MTC prepares and adopts the TIP at least every four years, in coordination with Caltrans, local jurisdictions and transit operators. The TIP must demonstrate year-by-year financial constraint. It

must also be consistent with the adopted long-range regional plan and must conform to applicable air quality requirements.

Regionally Significant Projects

Under federal transportation conformity regulations, regionally significant and other non-exempt projects form the foundation of the regional emissions analysis. The Conformity SIP defines regionally significant projects as transportation projects — other than exempt projects — on facilities that serve regional transportation needs and would normally be represented in the regional travel demand model. This includes all principal arterial highways and fixed-guideway transit facilities that provide an alternative to regional highway travel. All regionally significant projects in the long-range regional plan and TIP are explicitly represented in Travel Model 1.6 (TM1.6) network assumptions used for this regional emissions analysis.

Projects are otherwise classified as exempt or non-exempt under 40 CFR §§93.126–93.128, depending on their potential to affect emissions or travel behavior. Fully exempt projects (§93.126) include maintenance, safety and operational improvements that do not increase transportation system capacity or alter traffic patterns. These projects are excluded from the regional emissions analysis and are not subject to interagency consultation or project-level conformity review, except for verification of their exemption status.

Projects listed under §93.127 are not fully exempt from transportation conformity requirements. These projects are exempt from the regional emissions analysis but still require project-level conformity review. As a result of the Bay Area's PM2.5 nonattainment designation, these projects are evaluated through interagency consultation to determine whether they are a Project of Air Quality Concern (POAQC). Projects identified as POAQCs are required to undergo a project-level PM2.5 hot-spot analysis, consistent with EPA and FHWA guidance, to assess localized air quality impacts. See Appendix C and Appendix D for a list of regionally significant and non-exempt projects included in this analysis.

Transportation Control Measures

TCMs are strategies designed to reduce on-road motor vehicle emissions, playing a key role in helping regions meet and maintain federal air quality standards under the CAA. Once approved into the SIP, TCMs become enforceable commitments.

Regulatory Framework and MTC Responsibilities

Under federal transportation conformity regulations, MPOs like MTC are responsible for ensuring timely implementation of all TCM commitments in the SIP.

MTC's transportation conformity determination must demonstrate that:

- All applicable TCMs are being implemented on schedule or have been completed;
- No TCM commitments have been delayed or withdrawn without appropriate substitution through the SIP process; and

- Progress on TCM implementation is tracked and documented as part of regional transportation conformity analyses and air quality reporting.

History of Bay Area TCMs

The Bay Area's TCM commitments have evolved through successive SIP revisions, reflecting long-standing efforts to reduce transportation-related emissions:

- 1982 Bay Area Air Quality Plan: Introduced 12 ozone-related TCMs.
- 1990 Federal Court Order: In response to a court order, MTC adopted 16 additional contingency TCMs to ensure reasonable further progress toward attainment.
- 1994 Ozone Maintenance Plan: Incorporated the contingency TCMs into the SIP.
- Carbon Monoxide Measures: Two additional TCMs addressed localized carbon monoxide concerns in downtown San José.
- 2001 Ozone Attainment Plan: Added five new measures (TCMs A–E), which were fully funded in the 2001 Regional Transportation Plan and TIP.
- EPA 2004 Finding of Attainment: Approved TCMs A–E into the SIP and confirmed that all 33 TCMs (1–28 and A–E) had been fully implemented.

Status of Bay Area TCMs

All TCMs included in the approved SIP have been implemented and remain enforceable under the federal CAA (69 FR 54006, September 7, 2004). MTC monitors and maintains these commitments through ongoing regional transportation planning and funding programs. MTC fulfills these responsibilities in coordination with the Bay Area Air District, ABAG and CARB.

See Appendix E for additional information on TCMs.

Modeling & Assumptions

This transportation conformity analysis is based on the latest available planning assumptions, using an integrated set of regional models to estimate future travel activity and mobile-source emissions. These methods reflect current forecasts for land use and population, updated transportation network assumptions, and the most recent emissions modeling tools approved for use in California. Model results have been analyzed for reasonableness and compared to historical trends.

Consistent with MTC's established interagency consultation procedures, modeling assumptions, data inputs and methods were shared with the Air Quality Conformity Task Force for review and concurrence prior to finalizing this analysis.

Socioeconomic and Land Use Forecasts

The socioeconomic and land use assumptions used in this analysis are based on the regional growth forecast for Plan Bay Area 2050+, developed by MTC and ABAG.[2] These forecasts — summarized in Table 1 — provide projections of population, employment, households and housing units through 2050, serving as core inputs to the regional land use and travel models.

Table 1. Plan Bay Area 2050+ Regional Growth Forecast (1000s)

Forecast	2020	2025	2030	2035	2040	2045	2050	% Change 2020 to 2050
Population	7,749	7,723	8,048	8,476	8,903	9,266	9,586	24%
Employment	4,025	4,154	4,661	4,855	5,079	5,255	5,436	35%
Households	2,798	2,902	3,027	3,312	3,511	3,662	3,796	36%
Housing Units	2,875	3,018	3,187	3,486	3,696	3,855	3,996	39%

Land Use and Travel Demand Modeling

This analysis uses an integrated modeling framework composed of the regional land use model, Bay Area UrbanSim 2 (BAUS2), and regional activity-based travel model TM1.6. Together, these tools simulate how land development and travel activity would evolve over the plan horizon in

[2] ABAG approved the Regional Growth Forecast Methodology in September 2019, which guided the development of the Plan Bay Area 2050 Regional Growth Forecast and which is carried forward into Plan Bay Area 2050+. The Plan Bay Area 2050+ Regional Growth Forecast was shared in draft form in November 2023 to the MTC and ABAG committees and was proposed to be carried forward into the Final Blueprint phase as the Final Regional Growth Forecast for Plan Bay Area 2050+. The final Regional Growth Forecast was approved as part of the Final Blueprint in 2025.

response to changes guided by the regional growth forecast and strategies adopted in Plan Bay Area 2050+.[3]

Bay Area UrbanSim 2: Land Use Model

BAUS2 is a parcel-based land use model that simulates how development and redevelopment occur across the Bay Area. Built on a detailed base-year dataset of existing buildings, households, jobs and local land use policies, the model projects growth in five-year increments by adhering to the regional growth forecast of Plan Bay Area 2050+.

New households and jobs are allocated across the Bay Area through sub-models that account for market conditions and neighborhood characteristics. BAUS2 also integrates strategies from Plan Bay Area 2050+ — such as density and intensity changes — that shape the location and pattern of future development.

Every five years, model results are summarized at the level of Traffic Analysis Zones (TAZs), producing household and employment estimates that serve as essential inputs to the regional travel model.

Travel Model 1.6: Travel Model

TM1.6 is a regional, activity-based travel demand model used to simulate daily travel across the Bay Area. It forecasts how, when and where people travel by accounting for trip purpose, time of day, travel mode and destination. The model captures how travelers respond to regionally significant and other non-exempt transportation projects and policies, quantifying the collective impact of individual decisions on the Bay Area's transportation networks.

The modeling framework includes two primary tools: a population synthesizer and the travel model itself. The population synthesizer creates a synthetic population of individuals and households, assigning detailed characteristics to ensure realistic simulation of daily activities. These characteristics are calibrated at the TAZ level to align with Census data and land use forecasts. TM1.6 then uses this synthetic population to simulate weekday travel behavior under typical conditions: school in session, favorable weather and no major disruptions. The model represents aggregated behavior of vehicles and transit riders.

TM1.6 operates across 1,454 TAZs and uses household and job projections from BAUS2 to define trip origins and destinations. Zone-to-zone travel impedances — represented by travel time, distance and cost — influence travelers' mode and route choices.[4] As a result, the model is reasonably sensitive to changes in travel time, cost and other factors that affect travel behavior.[5]

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[3] See Draft Plan Bay Area 2050+ Modeling and Forecasting Report for more information.
[4] See Travel Model One documentation on skims for the measurements of time, distance and cost. See documentation on model iterations and iteration steps for more information on how skims affect mode choice, trip generation and trip assignment.
[5] See Travel Mode One documentation on the Utility Expression Calculator and detailed Utility Sheet for definitions of the choice models. MTC staff also conducted travel model sensitivity tests as part of the Sustainable Communities Strategies during Plan Bay Area 2050 and Plan Bay Area 2050+.

The model's transportation networks incorporate regionally significant and other non-exempt projects in Plan Bay Area 2050+, along with other planned investments and policy strategies. Outputs include key travel activity metrics such as vehicle miles traveled (VMT) by speed bin, time of day and county. Results are input directly into EMFAC, California's emissions modeling tool, to estimate on-road motor vehicle emissions through the plan horizon year.

The travel model is regularly updated. The current analysis uses Travel Model 1.6 (version 1.6.1), released in May 2025, which is a minor update to Travel Model 1.5. While Travel Model 1.5 used 2015 as its base year and was calibrated and validated to 2015 conditions, Travel Model 1.6 updates the base year to 2023 to reflect post-COVID conditions and travel patterns.

Specifically, Travel Model 1.6 incorporates 2023 assumptions for land use, roadway networks (links and tolls), and transit networks (routes, frequencies and fares). It also introduced new model features to represent post-COVID work-from-home patterns and changes in mode preference and was calibrated and validated to 2023 conditions based on observed data from the Caltrans Performance Measurement System (PeMS) and the National Transit Database (NTD). These updates ensure that the travel model used in the conformity analysis is no more than 10 years old as of this conformity analysis and determination date. Additional details on data sources supporting the base-year model update are provided in Table 9, Planning Assumptions table in Appendix B.

Integrated Land Use and Travel Modeling

BAUS2 and TM1.6 are designed to work in tandem, exchanging information in an iterative feedback loop that links land use and transportation outcomes. TM1.6 provides BAUS2 with accessibility measures for future years, capturing how planned infrastructure investments and policy strategies affect the ease of travel for different locations in the Bay Area. These accessibility measures indirectly influence where new housing units are more likely to locate.

In turn, BAUS2 supplies TM1.6 with projected land use patterns, including the spatial distribution of households, jobs and other activities that define trip origins and destinations. This information, provided at the TAZ level, reflects how growth and redevelopment unfold over the plan horizon year.

By exchanging these inputs, the two models allow land use patterns to respond to changes in the transportation system, while travel forecasts account for evolving development patterns. This feedback loop captures the dynamic interplay between land use and transportation, ensuring that forecasts reflect both the potential for induced travel demand and the long-term impacts of policy decisions.

Figure 2. Integrated Modeling Framework

Modeled Network Capacity by Analysis Year

Regionally significant and other non-exempt projects from Plan Bay Area 2050+ and the Amended 2025 TIP are represented in Travel Model 1.6's transportation networks to reflect changes in system capacity over the plan horizon. These projects include capacity-enhancing investments such as new roadways, additional freeway lanes, express lanes or major transit expansions.

Projects are represented in the model networks based on their anticipated implementation, or open year. This phasing allows the model to represent the evolving transportation network at each analysis year and ensures that emissions estimates are based on facilities and services reasonably expected to be open at that time. The resulting network changes, in combination with changes in land use, directly influence travel forecasts and associated vehicle activity used in the regional emissions analysis.

Table 2 summarizes the changes in network capacity by analysis year.

Table 2. Modeled Network Capacity

Facility Type	2023	2030	2040	2050
Freeway Lane-Miles	5,057	5,173	5,187	5,190
Priced Freeway Lane-Miles	14%	20%	100%	100%
Freeway Ramp Lane-Miles	665	671	677	677
Expressway Lane-Miles	1,096	1,116	1,145	1,144
Arterial Lane-Miles	8,657	8,614	8,638	8,580
Collector Lane-Miles	5,508	5,507	5,519	5,519
Total Roadway Lane-Miles	**20,983**	**21,082**	**21,165**	**21,110**
Local Bus Seat-Miles	9,176,800	10,593,900	11,924,700	12,786,000
Express Bus Seat-Miles	1,456,700	1,872,200	2,624,700	2,890,600
Light Rail Seat-Miles	1,921,600	2,209,500	2,964,600	3,172,800
Heavy Rail Seat-Miles	12,522,900	20,214,300	21,113,900	21,199,200

Facility Type	2023	2030	2040	2050
Commuter Rail Seat-Miles	5,494,900	6,170,000	7,322,300	7,322,300
Ferry Seat-Miles	852,100	1,460,700	1,990,700	2,148,800
Total Transit Seat-Miles	**31,425,000**	**42,520,500**	**47,940,900**	**49,519,800**

Emissions Modeling

This transportation conformity analysis uses CARB's EMission FACtors model (EMFAC2021 v1.0.2), approved by EPA on November 23, 2022 (87 FR 71576) for use in SIP development and transportation conformity analyses. Recent state and federal regulatory actions affect some of the assumptions embedded in EMFAC2021; therefore, this analysis incorporates CARB-developed and EPA-approved off-model adjustment factors to ensure emissions estimates reflect the most current federally approved methods.

EMFAC2021

EMFAC2021 is California's official mobile-source emissions model, developed by CARB and approved by EPA for use in SIPs and transportation conformity analyses. It reflects California-specific vehicle fleet characteristics, emissions control programs and environmental conditions, and generates emissions for key pollutants and precursors. These include volatile organic compounds (VOC), reactive organic gases (ROG), nitrogen oxides (NOx), carbon monoxide (CO), and fine particulate matter (PM2.5). This transportation conformity analysis focuses on VOC, NOx and PM2.5.

EMFAC2021 estimates emissions for all on-road vehicle classes — including light-and medium-duty passenger vehicles, medium- and heavy-duty trucks, buses, and motorcycles — operating under a range of speeds, roadway types and environmental conditions. The model incorporates the latest data on vehicle population, age distribution, travel activity, fuel properties, and inspection and maintenance programs, as well as the effects of adopted statewide emissions standards and control measures.

County-level vehicle activity estimates were developed using outputs from TM1.6. These daily VMT estimates, stratified by EMFAC-defined speed bin, serve as the primary input to EMFAC2021. Using these inputs, the model applies pollutant-specific emission rates by vehicle class, speed, fuel type, and seasonal condition to estimate total on-road emissions. In addition to VMT inputs, EMFAC2021 incorporates vehicle fleet mix and age distribution data from both Department of Motor Vehicles (DMV) registrations and EMFAC defaults, seasonal adjustment factors based on county-level meteorological profiles, and regulatory control programs finalized prior to 2020.

Off-Model Adjustment Factors

In June 2025, federal action under the Congressional Review Act (CRA) revoked several of CARB's waivers under the CAA that allowed California to enforce stricter vehicle-emissions standards, including Advanced Clean Cars II, Advanced Clean Trucks (ACT), and heavy-duty "Omnibus"

regulations. Because some of these standards were embedded in EMFAC2021 assumptions, CARB developed off-model adjustment factors to remove the emission benefits attributed to ACT, Zero Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Omnibus regulations from EMFAC2021.

On November 24, 2025, EPA approved these off-model adjustment factors for use in SIP development and transportation conformity analyses. The November 2025 adjustment factors supersede interim off-model adjustment factors for EMFAC2021 approved by EPA in 2023, which accounted for the emission benefits of California's heavy-duty Vehicle Inspection & Maintenance Program (the "HD I/M Program").

The off-model adjustment factors are multipliers applied to emissions modeled by EMFAC2021. They affect emissions estimates for NOx (exhaust), PM2.5 (exhaust, brake wear, tire wear), PM10 (exhaust, brake wear, tire wear), and ROG (exhaust and evaporative), depending on the pollutant and source category.

For this analysis, EMFAC2021 outputs were adjusted using the EPA-approved November 2025 adjustment factors to reflect updated regulatory assumptions and ensure consistency with current federally approved methods. Model inputs included VMT by speed bin, time of day and county as generated by TM1.6. EMFAC2021 default values were used for fleet composition, vehicle age distribution and seasonal adjustments.

Travel Activity Inputs

Table 3, Summary of Modeled Travel Activity, summarizes select travel activity inputs supporting EMFAC2021 emissions modeling. Figure 3, Summary of Modeled Mode Share, illustrates mode share estimates by year for all trips regionwide.

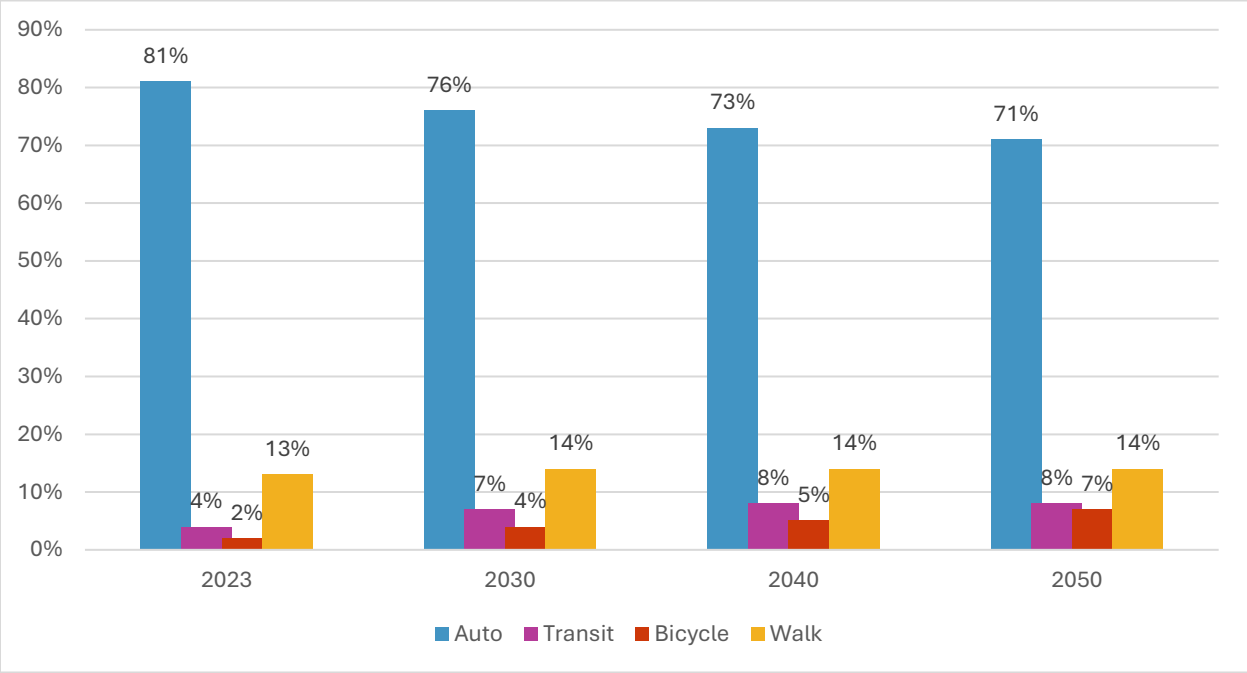
MTC staff determined that the results, summarized in Table 3 and Figure 3, are reasonable when compared with historical trends. The increase in daily VMT is associated primarily with population and employment growth. The relatively low transit mode share in 2023 is largely attributable to post-COVID work-from-home patterns and changes in travel behavior. Compared with pre-COVID conditions, more Bay Area workers are working remotely, and workers are less likely to use transit when commuting to work. In future years, transit and bicycle trips are expected to increase modestly, while auto trip share is expected to decline. Implementing Plan Bay Area 2050 transportation and land use strategies, including all regionally significant projects and other non-exempt projects from the Amended 2025 TIP, would account for the change.

Table 3. Summary of Modeled Travel Activity – Bay Area Air Basin

Travel Activity	2023	2030	2040	2050
Vehicles in Use	4,112,000	4,550,000	4,848,000	5,350,000
Daily Engine Starts	20,811,000	23,050,000	24,635,000	27,315,000
Daily VMT*	150,959,000	163,275,000	170,226,000	183,801,000

Note: includes VMT assigned to the travel model network and intrazonal VMT.

Figure 3. Summary of Modeled Mode Share – All Trips



Conformity Demonstration

This section outlines the conformity test procedures and analysis years used to demonstrate compliance with EPA's Transportation Conformity Rule.

Conformity Tests and Budgets

Under EPA's Transportation Conformity Rule, specific test procedures are used to demonstrate that long-range regional plans and TIPs meet applicable air quality requirements. The type of test applied depends on whether the SIP includes an EPA-approved motor vehicle emissions budget for the pollutant in question.

Two transportation conformity test types are used:

- **Budget Test:** Applied when an approved SIP establishes a motor vehicle emissions budget for a specific pollutant. Regional emissions from the long-range regional plan and the TIP must be less than or equal to the SIP budget for each analysis year.
- **Interim Emissions Test (Baseline):** Used when no approved emissions budget is available. Regional emissions from the "build" scenario (long-range regional plan and TIP) must not exceed emissions from a designated baseline.

For this transportation conformity analysis, the appropriate test for each pollutant was determined based on the availability of approved SIP on-road motor vehicle emissions budgets and applicable SIP provisions.

- **Ground-Level Ozone** was evaluated using the emissions budget test, based on the EPA-approved VOC and NOx budgets from the 2001 Ozone Attainment Plan.
- **PM2.5** was evaluated using the interim emissions test, specifically the baseline year test, as no budgets have been approved. PM2.5 and NOx emissions were compared against 2008 baseline year emissions, as established through interagency consultation.

Ozone Budget Test

This conformity analysis uses the motor vehicle emissions budgets for volatile organic compounds (VOC) and nitrogen oxides (NOx)—the primary precursors to ground-level ozone—established in the San Francisco Bay Area 2001 Ozone Attainment Plan. The budgets, summarized in Table 4, remain in effect for transportation conformity under the 2008 and 2015 8-hour standards until superseded by EPA action. EPA found the budgets adequate on February 14, 2002, and formally approved them on April 22, 2004. They incorporate emission reductions from mobile-source control measures and the five TCMs committed by the 2001 Ozone Attainment Plan. The VOC and NOx budgets apply to all analysis years in this conformity determination.

Because the Bay Area is classified as a marginal nonattainment area, it is not required to prepare a new attainment demonstration or update its motor vehicle emissions budgets. As a result, ground-level ozone conformity continues to be demonstrated using the VOC and NOx budgets from the 2001 Ozone Attainment Plan (69 FR 54006, September 7, 2004).

For this analysis, transportation conformity is demonstrated if forecasted emissions of VOC and NOx from implementation of the long-range regional plan and TIP are less than or equal to the approved motor vehicle emissions budgets in each analysis year.

Table 4. VOC and NOx Emissions Budgets from 2001 Ozone Attainment Plan (tons/day)

Pollutant	2006 On-Road Motor Vehicle Emissions	2006 Mobile Source Control Measure Benefits	2006 TCM Benefits	On-Road Motor Vehicle Emissions Budget
VOC	168.5	(4.0)	(0.5)	**164.0**
NOx	271.0	n/a	(0.7)	**270.3**

A summary of the five 2001 Ozone Attainment Plan-committed TCMs and their contribution to ozone precursor emission reductions is provided in Table 5.

Table 5. Emission Reductions for TCMs A – E from 2001 Ozone Attainment Plan (tons/day)

TCM	VOC Emission Reductions through December 2006	NOx Emission Reductions through December 2006
TCM A: Regional Express Bus Program	0.20	0.20
TCM B: Bicycle/Pedestrian Program	0.04	0.03
TCM C: Transportation for Livable Communities	0.08	0.12
TCM D: Expansion of Freeway Service Patrol	0.10	0.25
TCM E: Transit Access to Airports	0.09	0.13
Total Reductions	**0.5**	**0.7**

PM2.5 Interim Emissions Test (Baseline Year Test)

Because no EPA-approved on-road motor vehicle emissions budget has been established for PM2.5, this conformity analysis applies the interim emissions test, using the baseline year test to demonstrate that regional on-road motor vehicle emissions remain at or below baseline-year levels.

Under this test, projected regional emissions from the long-range regional plan and TIP must be less than or equal to those from a designated baseline year. Through interagency consultation at the Air Quality Conformity Task Force on May 28, 2015, MTC, in coordination with partner agencies, selected 2008 as the baseline year, consistent with EPA guidance and the Bay Area's SIP development timeline for PM2.5.

For this analysis, transportation conformity is demonstrated if forecasted emissions of direct PM2.5 (from exhaust, brake wear, tire wear, and re-entrained road dust) and NOx (as a PM2.5 precursor) from implementation of the long-range regional plan and TIP are less than or equal to 2008 baseline levels in each analysis year.

Analysis Years Modeled

This transportation conformity analysis evaluates emissions for a set of analysis years selected in accordance with federal transportation conformity requirements. For this analysis, emissions were modeled for **2030**, **2040** and **2050**.

The analysis includes all existing regionally significant highway and transit facilities and services, as well as other non-exempt projects, from the long-range regional plan and TIP. Projects expected to open between 2025 and 2030 are included in the 2030 analysis network; those anticipated between 2025 and 2040 are included in the 2040 network; and those expected between 2025 and 2050 are incorporated into the 2050 network.

Regional Emissions Analysis

This section presents modeled regional emissions for each pollutant subject to transportation conformity in the Bay Area. Results show that regional emissions for all analysis years (2030, 2040 and 2050) meet the applicable transportation conformity tests, demonstrating that Plan Bay Area 2050+ and the Amended 2025 TIP satisfy all federal transportation conformity requirements.

Ozone Precursors: VOC and NOx

Table 6 summarizes modeled on-road motor vehicle emissions of volatile organic compounds (VOC) and nitrogen oxides (NOx) for 2030, 2040 and 2050, compared against applicable motor vehicle emissions budgets established in the 2001 Ozone Attainment Plan. Emissions were modeled under summertime conditions, consistent with the SIP, which established summertime budgets for ozone precursors.

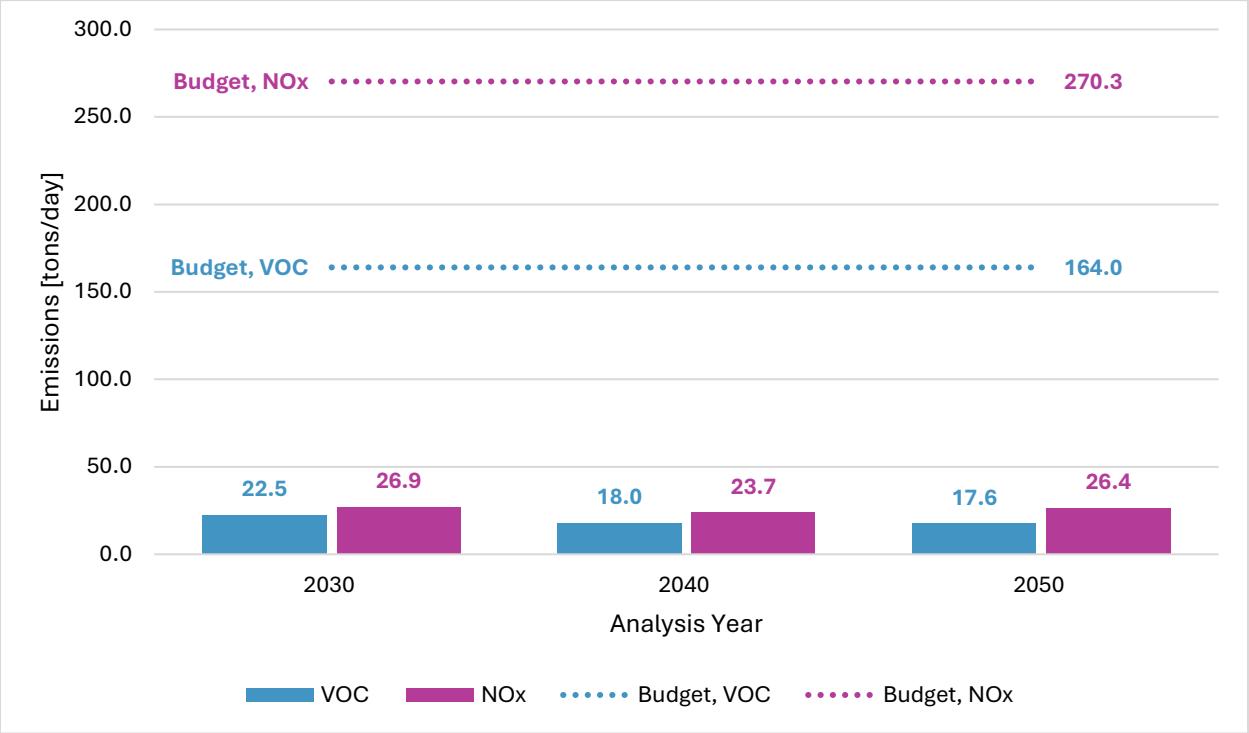
Table 6. Ozone Precursor Emissions Compared to Emission Budgets – Summertime Conditions (tons/day)

Year	VOC Budget[1]	Net VOC Emissions with CARB Adjustment Factors[2]	Net VOC Emissions with TCM Reduction[3, 4]
2030	164.0	23.0	22.5
2040	164.0	18.5	18.0
2050	164.0	18.1	17.6
Year	**NOx Budget[1]**	**Net NOx Emissions with CARB Adjustment Factors[2]**	**Net NOx Emissions with TCM Reduction[3,4]**
2030	270.3	27.6	26.9
2040	270.3	24.4	23.7
2050	270.3	27.1	26.4

[1] 2001 Ozone Attainment Plan
[2] CARB EMFAC2021 off-model adjustment factors applied to years 2030 through 2050 to remove the benefits of the ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus regulations.
[3] The transit services for TCM A Regional Express Bus Program were modeled. The emission benefits from TCM A are therefore included in the mobile-source VOC and NOx emission inventories for 2006 and beyond.
[4] TCM Reduction Benefits of (0.5) tons/day of VOC and (0.7) tons/day of NOx applied to all mobile-source emission inventories in Table 4.

Figure 4 shows that projected emissions remain well below the approved SIP budgets in all analysis years.

Figure 4: Ozone Precursor Emissions Compared to Emission Budgets – Summertime Conditions (tons/day)



Conclusion: Projected ozone precursor emissions from Plan Bay Area 2050+ and the Amended 2025 TIP are below the applicable SIP motor vehicle emissions budgets for all analysis years. Therefore, **the Bay Area meets the federal transportation conformity requirements for ozone**.

Fine Particulate Matter (PM2.5)

Table 7 summarizes modeled on-road motor vehicle emissions of directly emitted PM2.5 (including exhaust, brake wear, tire wear and re-entrained road dust) and NOx (as a PM2.5 precursor) for 2030, 2040 and 2050, compared against 2008 baseline levels consistent with the Baseline Year Test. Emissions were modeled under wintertime conditions, consistent with EPA guidance and regional air quality modeling practices for particulate matter analyses.

Table 7. PM2.5 and NOx Emissions Compared to 2008 Baseline – Wintertime Conditions (tons/day)

	2008 Baseline Year	2030[1]	2040[1]	2050[1]
PM2.5[2]	8.21	1.60 (3.86)	1.67 (4.24)	1.84 (4.69)
NOx	227.71	31.14	27.31	30.08

[1] CARB EMFAC2021 off-model adjustment factors applied to years 2030 through 2050 to remove benefits of ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus regulations.

[2] Reported PM2.5 emissions reflect exhaust, brake wear and tire wear. Parenthetical values also account for re-entrained road dust, which is provided for informational purposes only.

Figures 5 and 6 show that projected emissions of PM2.5 and NOx remain well below the 2008 baseline levels in all analysis years.

Figure 5. PM2.5 Emissions Compared to 2008 Baseline – Wintertime Conditions (tons/day)

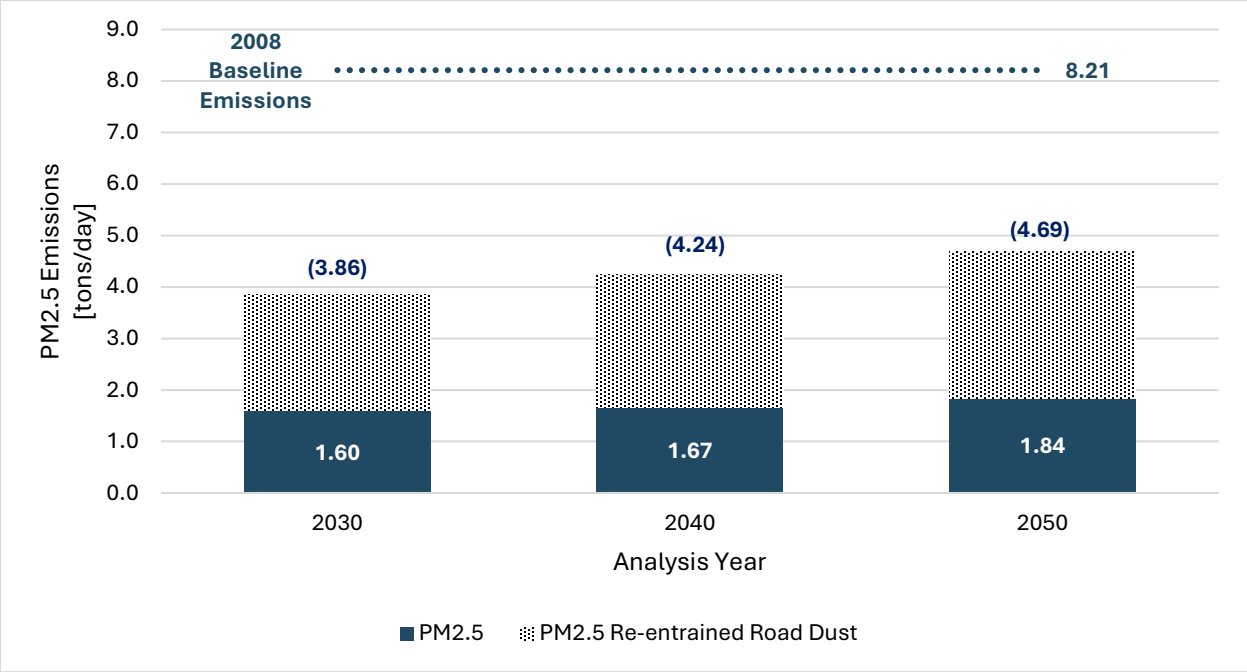
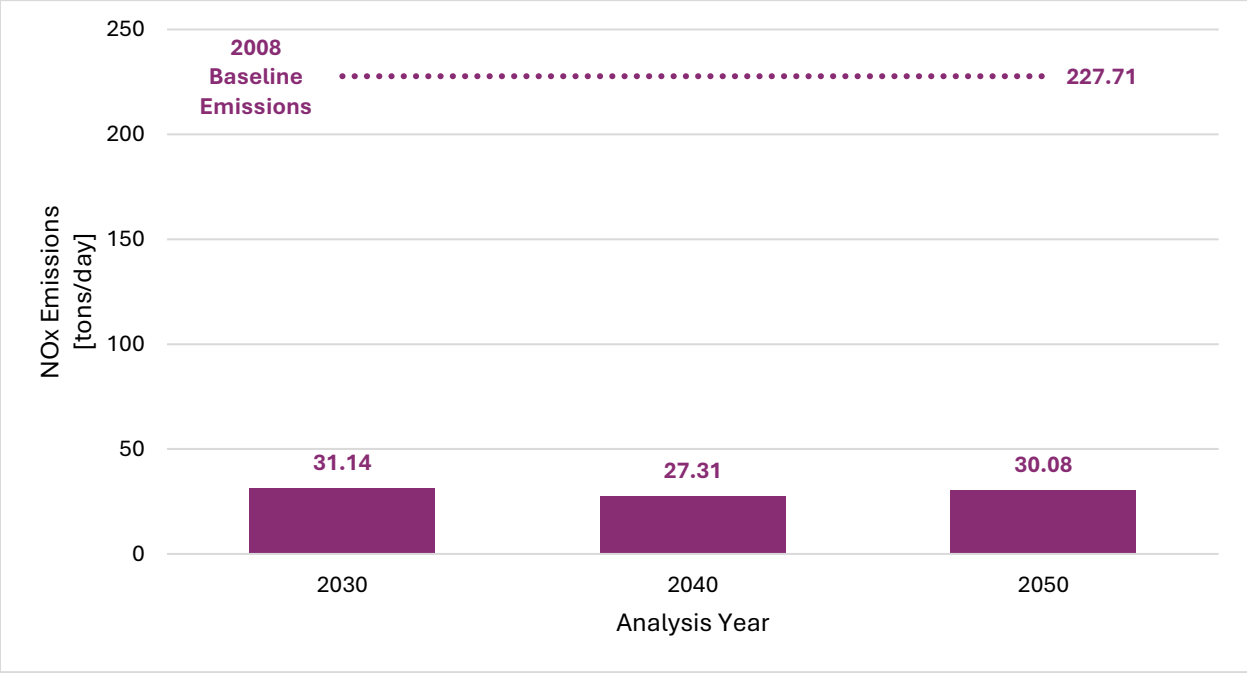


Figure 6. NOx Emissions Compared to 2008 Baseline – Wintertime Conditions (tons/day)



Conclusion: Projected PM2.5 and NOx emissions from Plan Bay Area 2050+ and the Amended 2025 TIP are below the 2008 baseline levels for all analysis years. Therefore**, the Bay Area meets the federal transportation conformity requirements for PM2.5.**

Interagency Consultation & Public Involvement

This transportation conformity determination was prepared in accordance with procedures established in the Bay Area Conformity SIP and satisfies all applicable federal and state requirements. It supports MTC's finding that Plan Bay Area 2050+ and the Amended 2025 TIP conform to applicable air quality plans. All required transportation conformity elements — including pollutant budgets, TCMs, implementation schedules and financial constraint — have been fully addressed.

All modeling assumptions used in this determination are consistent with Plan Bay Area 2050+ and the Amended 2025 TIP and were reviewed through the formal interagency consultation process. Participating agencies included MTC, Caltrans, CARB, the Bay Area Air District, EPA, FHWA and FTA.

Consultation Process Summary

Ongoing consultation with the Air Quality Conformity Task Force has been integral to preparing this transportation conformity analysis and is expected to continue through its completion. Task Force discussions have occurred and are anticipated to continue on the following meeting dates:

- **July 2023**: Proposed Plan Bay Area 2050+ overview and proposed schedule.
- **July 2025:** Discussion of proposed approach for the transportation conformity analysis.
- **October 2025:** Review of modeling assumptions, analytical approach, and draft analysis.
- **December 2025:** Review of updated modeling assumptions, analytical approach, and revised analysis.
- **January 2026:** Discussion of comments received on the draft transportation conformity analysis.
- **February 2026:** Review of final transportation conformity analysis and report.

Summary of Public Process

In accordance with MTC's adopted Public Participation Plan, a 30-day public review and comment period was conducted following the release of the Draft Transportation-Air Quality Conformity (AQC) Report, from December 22, 2025, through January 21, 2026. The public comment period was announced via email and noticed on the Plan Bay Area and MTC websites, and the draft conformity analysis was made available online at https://planbayarea.org/draftplan. During this period, stakeholders and members of the public had the opportunity to submit formal comments on the draft analysis via email and in writing.

MTC received five comment letters during the public comment period, which are included in Appendix H.

Table 8. List of Commenters

Letter No	Commenter	Date
1	Bill Mayben	December 22, 2025
2	Caltrans Air Quality Branch, Stephen Conteh	January 7, 2026
3	Peter Hensel	January 14, 2026
4	Jon Hamilton	January 14, 2026
5	Brian Swanson, AICP	January 19, 2026

Of the five comment letters received, one directly addressed the scope of the regional transportation conformity analysis and findings documented in the Draft Transportation–Air Quality Conformity (AQC) Report by requesting additional detail and transparency regarding the assumptions used in the analysis, as well as further documentation to demonstrate that the analysis and findings satisfy all applicable federal transportation conformity requirements. The remaining comments raised broader policy, planning or environmental concerns outside the scope of the federal transportation conformity determination (but addressed through other regional, state or local planning processes, as appropriate).

In response, refinements have been incorporated into the final report; however, these refinements did not result in any changes to the draft emissions analysis or the draft conformity findings. A complete summary of comments responses is provided in Appendix I.

Members of the public will have the opportunity to provide public comment at the March 13, 2026, MTC Planning Committee meeting and the March 25, 2026, MTC Commission meeting, prior to the Commission's consideration of approval of the regional transportation conformity analysis and adoption of an initial conformity determination under MTC Resolution No. 4748

Conformity Findings

Based on the analysis documented in this report, MTC makes the following transportation conformity determination:

- This transportation conformity analysis was conducted in accordance with EPA's transportation conformity regulations and the San Francisco Bay Area Transportation Air Quality Conformity Protocol, adopted by MTC as Resolution No. 3757.
- Plan Bay Area 2050+ and the Amended 2025 TIP provide for implementation of all TCMs committed by the applicable SIP, consistent with 40 CFR 93.113(c). Specifically:
    (1) An examination of the specific steps and funding source(s) needed to fully implement each TCM indicates that TCMs which are eligible for funding under title 23 U.S.C. or the Federal Transit Laws are on or ahead of the schedule established in the applicable implementation plan, or, if such TCMs are behind the schedule established in the applicable implementation plan, the MPO and DOT have determined that past obstacles to implementation of the TCMs have been identified and have been or are being overcome, and that all State and local agencies with influence over approvals or funding for TCMs are given maximum priority to approval or funding to TCMs over other projects within their control, including projects in locations outside the nonattainment or maintenance area.
    (2) If TCMs in the applicable implementation plan have previously been programmed for Federal funding but the funds have not been obligated and the TCMs are behind the schedule in the implementation plan, then the TIP cannot be found to conform if the funds intended for those TCMs are reallocated to projects in the TIP other than TCMs, or if there are no other TCMs in the TIP, if the funds are reallocated to projects in the TIP other than projects which are eligible for Federal funding intended for air quality improvements projects, e.g., the Congestion Mitigation and Air Quality Improvement Program.
    (3) Nothing in the TIP may interfere with the implementation of any TCM in the applicable implementation plan. (40 CFR Part 93.113(c)).
- For ground-level ozone precursors (VOC and NOx), regional on-road motor vehicle emissions modeled under summertime conditions for Plan Bay Area 2050+ and the Amended 2025 TIP are lower than the applicable SIP motor vehicle emissions budgets for the 2008 and 2015 national 8-hour ozone standards in all analysis years (2030, 2040 and 2050).
- For fine particulate matter (PM2.5) and its precursor NOx, regional on-road motor vehicle emissions modeled under wintertime conditions for Plan Bay Area 2050+ and the Amended 2025 TIP are lower than the 2008 baseline year emissions in all analysis years (2030, 2040 and 2050).

Therefore, Plan Bay Area 2050+ and the Amended 2025 TIP are found to conform to the SIP and meet all federal transportation conformity requirements.

Appendix A: Glossary

Area Source: Small stationary and non-transportation pollution sources that are too small and/or numerous to be included as point sources but may collectively contribute significantly to air pollution (e.g., dry cleaners).

Attainment Area: An area considered to have air quality that meets or exceeds the U.S. EPA national ambient air quality standards, which EPA establishes according to the requirements of the Clean Air Act. An area may be an attainment area for one pollutant and a nonattainment area for others. Nonattainment areas are areas designated by EPA as not meeting a standard for a pollutant.

Carbon Monoxide (CO): A colorless, odorless, tasteless gas formed in large part by incomplete combustion of fuel.

Human activities: (e.g., transportation or industrial processes) are largely the source for CO contamination in ambient air.

Congestion Management and Air Quality Improvement (CMAQ) Program: A categorical funding program under the Federal-aid Highway Program. CMAQ directs funding to projects that contribute to meeting or maintaining national ambient air quality standards in nonattainment and maintenance areas. CMAQ funds generally may not be used for projects that result in the construction of new capacity available to SOVs (single-occupant vehicles).

Emissions Inventory: A complete list of sources and amounts of pollutant emissions within a specific area and time interval.

Environmental Protection Agency (EPA): The Federal regulatory agency responsible for administering and enforcing Federal environmental laws including the Clean Air Act, the Clean Water Act, the Endangered Species Act, and others.

Federal Highway Administration (FHWA): An agency of the U.S. Department of Transportation that provides financial and technical support for constructing, improving, and preserving America's highway system.

Federal Transit Administration (FTA): An agency of the U.S. Department of Transportation that provides stewardship of combined formula and discretionary programs to support a variety of locally planned, constructed, and operated public transportation systems throughout the United States.

High Occupancy Vehicles (HOVs): Generally applied to vehicles carrying two or more people; freeways, expressways, and other large volume roads may have lanes designated for use by carpools, vanpools, and buses. The term HOV is also sometimes used to refer to high-occupancy vehicle lanes themselves.

Highway: Term applies to roads, streets, and parkways, and also includes rights-of-way, bridges, railroad crossings, tunnels, drainage structures, signs, guardrails, and protective structures in connection with highways.

Hydrocarbons (HC): Colorless gaseous compounds originating from evaporation and the incomplete combustion of fossil fuels.

Inspection and Maintenance Program (I/M): An emissions testing and inspection program implemented to ensure that the catalytic or other emissions control devices on in-use vehicles are properly maintained over time.

Land Use: Refers to the manner in which portions of land or the structures on them are used (i.e., commercial, residential, retail, industrial, etc.).

Lapse: Means that the transportation conformity determination for a metropolitan transportation plan or TIP has expired, and thus there is no currently conforming metropolitan transportation plan and TIP.

Maintenance Area: Any geographic region of the United States previously designated nonattainment pursuant to the CAA Amendments of 1990 and subsequently re-designated to attainment subject to the requirement to develop a maintenance plan under Section 175A of the CAA, as amended.

Metropolitan Planning Organization (MPO): The policy board of an organization created and designated to carry out the metropolitan transportation planning process.

Metropolitan Transportation Plan: The official multimodal metropolitan transportation plan addressing no less than a 20-year planning horizon that is developed, adopted, and updated by the MPO through the metropolitan transportation planning process.

Metropolitan Transportation Plan/TIP Amendment: A revision to a metropolitan transportation plan or TIP that involves a major change to a project included in a metropolitan transportation plan or TIP including the addition or deletion of a project or a major change in project cost, project/project phase initiation dates, or a major change in design concept or design scope (e.g., changing project termini or the number of through traffic lanes). Changes to projects that are included only for illustrative purposes do not require an amendment. An amendment is a revision that requires public review and comment, re-demonstration of fiscal constraint, or a transportation conformity determination (for those involving "non-exempt" projects in nonattainment and maintenance areas).

Metropolitan Transportation Plan/TIP Update: Making current a metropolitan transportation plan or TIP through a comprehensive review. Updates require public review and comment, a 20-year horizon year for the metropolitan transportation plan, a four-year program period for TIPs, demonstration of fiscal constraint, and a transportation conformity determination (in nonattainment and maintenance areas).

Mobile Sources: Include motor vehicles, aircraft, seagoing vessels, and other transportation modes. The mobile source related pollutants are carbon monoxide, hydrocarbons or volatile organic compounds, nitrogen oxides, and particulate matter.

Mode: A form of transportation such as an automobile, bus, or bicycle.

Motor Vehicle Emissions Budget (MVEB): That portion of the total allowable emissions defined in the submitted or approved control strategy implementation plan revision or maintenance plan for a certain date for the purpose of meeting reasonable further progress milestones or demonstrating attainment or maintenance of the NAAQS, for any criteria pollutant or its precursors, allocated to highway and transit vehicle use and emissions.

National Ambient Air Quality Standards (NAAQS): Those standards established pursuant to Section 109 of the CAA. Conformity applies in areas that are nonattainment or maintenance for one or more of the NAAQS of the transportation-related pollutants: ozone, carbon monoxide, nitrogen dioxide, and particulate matter.

National Environmental Policy Act (NEPA): The National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.). It is the major legislation that requires Federal actions to address potential environmental impacts.

Nitrogen Oxides (NOx): A group of highly reactive gases that contain nitrogen and oxygen in varying amounts. Many of the nitrogen oxides are colorless and odorless. NOx is formed when the oxygen and nitrogen in the air react with each other during combustion. The primary sources of nitrogen oxides are motor vehicles, electric utilities, and other industrial, commercial, and residential sources that burn fuels.

Nonattainment Area: Geographic region of the United States that the EPA has designated as not meeting the NAAQS.

Oxygenated Gasoline: Gasoline enriched with oxygen-bearing liquids to reduce CO production by permitting more complete combustion.

Ozone (O3): A pollutant that is not directly emitted from transportation sources. It is a secondary pollutant formed when HC and NOx combine in the presence of sunlight. Ozone is associated with smog or haze conditions. Although the ozone in the upper atmosphere protects us from harmful ultraviolet rays, ground-level ozone produces an unhealthy environment in which to live. Ozone is created by human and natural sources.

Particulate Matter (PM, PM2.5, PM10): Any material that exists as solid or liquid in the atmosphere. Particulate matter may be in the form of fly ash, soot, dust, fog, fumes, etc. Particulate matter can be of such a small size that it cannot be filtered by the nose and lungs. PM10 is particulate matter that is less than 10 microns in size. PM2.5 is particulate matter that is less than 2.5 microns in size. A micron is one millionth of a meter.

Parts Per Million (PPM): A measure of air pollutant concentrations.

Public Participation: The active and meaningful involvement of the public in the development of metropolitan transportation plans and programs.

Public Transportation Generally refers to passenger service provided to the general public along established routes with fixed or variable schedules at published fares. Related terms include: public transit, mass transit, urban transit, and paratransit.

Reformulated Gasoline (RFG): Gasoline specifically developed to reduce undesirable combustion products.

State Implementation Plan (SIP): The State air quality plan for meeting the National Ambient Air Quality Standards ("NAAQS" or "air quality standards"). It is a compilation of legally enforceable rules and regulations prepared by a State or local air quality agency and submitted by the State's governor to EPA for approval. A SIP is designed to achieve better air quality by attaining, making progress toward attaining, or maintaining the NAAQS.

Stationary Source: Relatively large, fixed sources of emissions (e.g., chemical process industries, petroleum refining and petrochemical operations, or wood processing).

Telecommuting: The substitution, either partially or completely, of transportation to a conventional office through the use of computer and telecommunications technologies (e.g., telephones, personal computers, modems, facsimile machines, electronic mail).

Transportation Conformity: Process to assess the compliance of any metropolitan transportation plan, program, or project with air quality implementation plans. The transportation conformity process is defined by the Clean Air Act and regulated by the transportation conformity rule.

Transportation Control Measures (TCMs): Any measure that is specifically identified and committed to in the applicable implementation plan, including a substitute or additional TCM that is incorporated into the applicable SIP through the process established in the CAA Section 176(c)(8), that is either one of the types listed in Section 108 of the CAA, or any other measure for the purpose of reducing emissions or concentrations of air pollutants from transportation sources by reducing vehicle use or changing traffic flow or congestion conditions.

Notwithstanding the first sentence of this definition, vehicle technology-based, fuel-based, and maintenance-based measures that control the emissions from vehicles under fixed traffic conditions are not TCMs for the purposes of transportation conformity.

Transportation Improvement Program (TIP): A prioritized listing/program of transportation projects covering a period of four years that is developed and formally adopted by an MPO as part of the metropolitan transportation planning process, consistent with the metropolitan transportation plan, and required for projects to be eligible for funding under Title 23 USC and Title 49 USC Chapter 53.

Vehicle Miles Traveled (VMT): The sum of distances traveled by all motor vehicles in a specified region.

Volatile Organic Compounds (VOCs): VOCs come from vehicle exhaust, paint thinners, solvents, and other petroleum-based products. A number of exhaust VOCs are toxic, with the potential to cause cancer.

Source: FHWA 2017

Appendix B. Plan Bay Area 2050+ Forecasting and Modeling Report

Table 9 summarizes the key planning assumptions used in this regional transportation conformity analysis. Additional modeling details are included in the Plan Bay Area 2050+ Forecasting and Modeling Report. The full draft report can be accessed at the following link: https://planbayarea.org/digital-library/plan-bay-area-2050-plus-forecasting-and-modeling-reportpdf

Table 9. Planning Assumptions

Planning Assumptions	Data Source and Methodology
Land use assumptions (population, households, employment, housing)	Land use assumptions for the base year are based on observed data, including Census ACS and LEHD data, Employment Development Department (EDD) data and Bureau of Labor Statistics (BLS) data. Land use is modeled using the Bay Area UrbanSim 2 land use model (BAUS2). Land use assumptions for future analysis years are based on the regional growth forecast for Plan Bay Area 2050+, developed by MTC and ABAG and approved by the Commission and ABAG Executive Board as part of the Final Blueprint in 2025.
Transportation supply assumptions (roadway network, transit network, prices)	Transportation supply assumptions for 2023 reflect the infrastructure in place in 2023. Transportation is modeled using Travel Model 1.6.1. Transportation supply assumptions for future analysis years include the following components: - Projects that are under construction - Regionally significant projects and other non-exempt transportation projects in Plan Bay Area 2050+ and Amended 2025 TIP, such as transit service increases, express lane conversions, planned transit fare changes - Scheduled toll increases, such as bridge toll increases approved by the Bay Area Toll Authority (BATA) and Golden Gate Bridge Highway & Transportation District - Projected auto-operating costs, as developed in collaboration with California Air Resources Board (CARB)
Post-COVID travel behavior assumptions	Work-from-home assumptions are based on observed data from MTC's 2023 Bay Area Travel Study (2023 BATS) and U.S. Survey of Working Arrangements and Attitudes (SWAA). Post-COVID mode preference change assumptions are based on observed data from the National Transit Database for 2023 conditions. For future years, this analysis assumes that Plan Bay Area 2050+

Planning Assumptions	Data Source and Methodology
	strategies would affect the mode reference change, based on research conducted by Fehr & Peers. When developing these assumptions, observed data from Caltrans Performance Measurement System (PeMS) and the National Transit Database (NTD) was used to calibrate and validate TM1.6. For roadway conditions, PeMS traffic volume data from 2022, 2023 and 2024 from almost 1000 PeMS stations were utilized. For transit ridership, NTD ridership data from both 2015 and 2023 was used to measure the ridership change. There assumptions have been incorporated into the Technical Methodology document submitted to CARB in fall 2025.
EMFAC 2021 Model Assumptions	Modeled emissions are based on EMFAC 2021 v1.0.2, the latest emission inventory model that CARB developed to assess emissions from on-road motor vehicles, including cars, trucks and buses in California. This version of the model reflects CARB's latest understanding of statewide and regional vehicle activities, emissions and regulations. EMFAC 2021 includes updates for: - Vehicle Technologies: Adds PHEVs and natural gas vehicles with real-world emission rates and activity; expands HD truck weight and vocation categories. - Emissions Coverage: Includes ammonia emissions; updates LD and HD exhaust, brake wear, motorcycle, evaporative, and CO_2 emission factors using new testing data. - Fleet & Activity Data: Updates vehicle populations and activity using recent DMV, IRP, CHP, NHTS-CA, major ports, and PEMS datasets. - Regulations & Policies: Incorporates major CARB and federal rules (HD Omnibus, ACT, ICT, HDVIP/PSIP, SAFE Rules, Clean Car agreements). CARB provided EPA-approved off-model adjustment factors to remove the benefits of several regulations in the EMFAC 2021 v1.0.2 baseline, including Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Heavy-Duty Omnibus (Omnibus) regulations. These off-model adjustments are reflected in the regional emissions analysis.

Appendix C. Regionally Significant Projects

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T05-013		Next Generation Freeways Pricing Strategy | Regional	This program includes funding to implement toll infrastructure, such as toll gantries, to collect per-mile tolls charged to vehicles on all Bay Area freeway corridors during peak periods on weekdays.	Regional		x	x
25-T05-015		Congestion Pricing & Mobility Improvements | Treasure Island	This program includes funding to implement cordon-based congestion pricing for vehicles leaving and entering Treasure Island. Improvements include toll affordability programs; Muni bus frequency upgrades; free shuttles; a new ferry terminal; new ferry service between Treasure Island and the San Francisco Ferry Building (30 minute peak headways); and new AC Transit express bus service to Oakland (10 minute peak headways).	San Francisco		x	x
25-T05-016		Congestion Pricing & Mobility Improvements | Downtown San Francisco	This program includes funding to implement cordon-based congestion pricing for vehicles leaving and entering downtown San Francisco. Improvements include toll affordability programs; street improvements to support transit operations and cycling and pedestrian safety; frequency improvements on various Muni/SamTrans routes; transit signal priority; and dedicated bus lanes.	San Francisco	x	x	x
25-T06-017		Bay Area Forward Program | Regional	This program includes funding to implement initiatives to maximize the efficiency of freeway and arterial systems through active traffic demand management and multi-modal strategies. Improvements include implementation of toll bridge corridor "forward" programs, adaptive ramp metering, adaptive signal timing with transit signal priority, bus on shoulder lanes, congestion pricing on toll bridge corridors, arterial first and last mile solutions, and shared mobility pilot deployments.	Regional	x	x	x
25-T06-065	SR-85	Express Lane | HOV Conversion | SR-85 | Between SR-87 and US-101 ("Phase 4")	This program includes funding to implement a new express lane through an HOV lane conversion on SR-85 between SR-87 and US-101.	Santa Clara	x	x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T07-074	I-680	Express Lane | New Lane | I-680 (NB) | Between SR-84 and Alcosta Blvd	This program includes funding to implement express lanes through new lanes on northbound I-680 between SR-84 and Alcosta Blvd.	Alameda	x	x	x
25-T07-075	I-680	Express Lane | HOV Conversion/New Lane | I-680 (NB) | Between Livorna Rd and Arthur Rd	This program includes funding to implement express lanes through a new lane on northbound I-680 between Livorna Rd and SR-242 and an HOV conversion on northbound I-680 between SR-242 and Arthur Rd. Improvements include extending an existing managed lane between Livorna Rd and SR-242; and operational and safety enhancements.	Contra Costa	x	x	x
25-T07-076	I-880	Auxiliary Lane | New Lane | I-880 | Industrial Parkway Between Alameda Creek and Whipple Rd	This program includes funding to implement auxiliary lanes through new lanes on northbound I-880 between Industrial Pkwy and Alameda Creek, and southbound I-880 between Industrial Pkwy and Whipple Rd.	Alameda		x	x
25-T07-077	US-101	Express Lanes | New Lane | US-101 | Between I-380 and the San Francisco County Line	This program includes funding to implement express lanes through new lanes on US-101 between I-380 and the San Francisco County line.	San Mateo	x	x	x
25-T07-078	US-101	Express Lanes | HOV Conversion and New Lane | US-101 | Between SR-237 and South of I-880 ("Phase 5")	This program includes funding to implement express lanes on US-101 between SR-237 and south of I-880. Improvements include new express lanes through HOV conversions between SR-237 and the US-101/I-880 interchange; new express lanes through new lanes between Fair Oaks Ave and US-101/I-880 interchange; new auxiliary lanes through new lanes on US-101 between Great America Pkwy and Lawrence Expwy, and on- and off-ramp modifications.	Santa Clara	x	x	x
25-T07-079	US-101	Express Lanes | HOV Conversion and New Lane | US-101 | Between I-880 and SR-85 ("Phase 6")	This program includes funding to implement dual express lanes on US-101 between I-880 and SR-85. Improvements include new express lanes through HOV conversions between I-880 and SR-85; and new express lanes through new lanes between I-880 and Blossom Hill Rd.	Santa Clara	x	x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T07-080	SR-4	Auxiliary Lane | New Lane | SR-4 (EB) | Between Port Chicago Hwy and Willow Pass Rd	This program includes funding to implement auxiliary lanes through new lanes on eastbound SR-4 between Port Chicago Hwy and Willow Pass Rd. Improvements include a new auxiliary lane between the Port Chicago Hwy on-ramp and Willow Pass Rd off-ramp, a new auxiliary lane between Willow Pass Rd off-ramp and on-ramp, and a new exit lane at San Marcos Blvd off-ramp.	Contra Costa	x	x	x
25-T07-081	SR-4	Auxiliary Lane | New Lane | SR-4 (WB) | Between Willow Pass Rd and Port Chicago Hwy	This program includes funding to implement auxiliary lanes through new lanes on westbound SR-4 between Willow Pass Rd and Port Chicago Hwy. Improvements include new auxiliary lanes between the Willow Pass Rd on-ramp and Port Chicago Hwy off-ramp, a new exit lane at Port Chicago Hwy off-ramp, and modification of a mandatory exit lane to an optional exit lane.	Contra Costa			x
25-T07-082	SR-17	Auxiliary Lane | New Lane | SR-17 | Between Lark Ave and SR-9 ("SR-17 Corridor Congestion Relief Project")	This program includes funding to implement auxiliary lanes through new lanes on SR-17 in both directions between Lark Ave and SR-9. Improvements include off-ramp modifications, operational enhancements, such as ramp metering and information technology systems (ITS).	Santa Clara	x	x	x
25-T07-083	SR-37	HOV Lane, Tolling and Express Bus | New Lane | SR-37 | Between SR-121 and Mare Island ("Interim Project")	This program includes funding to implement HOV lanes through new lanes on SR-37 between SR-121 and Mare Island. Improvements include tolling infrastructure and new express bus service.	Marin, Napa, Solano, Sonoma	x	x	x
25-T08-095	Principal Arterial	Roadway Widening | Tassajara Rd | Between N Dublin Ranch Dr and Quarry Ln School/Rutherford Dr	This program includes funding to implement roadway widening on Tassajara Rd between N Dublin Ranch Dr and Quarry Ln School/Rutherford Dr. Improvements include widening the existing roadway from two to four lanes and new bicycle and/or pedestrian facilities.	Alameda	x	x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T08-096	Principal Arterial	Roadway Extension | Dublin Blvd-N Canyons Pkwy | Between Fallon Rd and Doolan Rd	This program includes funding to implement a roadway extension on Dublin Blvd-N Canyons Pkwy between Fallon Rd and Doolan Rd. Improvements include a six-lane extension between Fallon Rd and Croak Rd; a four-lane extension between Croak Rd and Doolan Rd; and bicycle and/or pedestrian facilities.	Alameda		x	x
25-T08-097	Principal Arterial	Roadway Widening and Extension | Quarry Lakes Pkwy | Between Paseo Padre Pkwy and SR-238 (Mission Blvd)	This program includes funding to implement roadway widening and extension on Quarry Lakes Pkwy between Paseo Padre Pkwy and SR-238 (Mission Blvd). Improvements include widening Decoto Rd; a new four-lane roadway between Paseo Padre Pkwy and SR-238; and bicycle and/or pedestrian enhancements.	Alameda		x	x
25-T08-098	Principal Arterial	Roadway Extension | El Charro Rd | Between Stoneridge Dr and Stanley Blvd	This program includes funding to implement a roadway extension on El Charro Rd between Stoneridge Dr and Stanley Blvd. Improvements include extending the four-lane roadway.	Alameda			
25-T08-099	Principal Arterial	Roadway Improvements | Grand Ave | Between MacArthur Blvd and Mandela Pkwy	This program includes funding to implement roadway improvements on Grand Ave between MacArthur Blvd and Mandela Pkwy. Improvements include transit priority infrastructure, a road diet, and new bicycle and/or pedestrian facilities.	Alameda		x	x
25-T08-100	Principal Arterial	Roadway Widening | Auto Mall Pkwy | Between Fremont Blvd and I-680	This program includes funding to implement roadway widening on Auto Mall Pkwy between Fremont Blvd and I-680. Improvements include widening the existing roadway from four to six lanes.	Alameda		x	x
25-T08-101	Principal Arterial	Roadway Widening | Brentwood Blvd, Phase 1 | Between Homecoming Wy and Lone Tree Wy	This program includes funding to implement roadway widening on Brentwood Blvd between Homecoming Wy and Lone Tree Wy. Improvements include widening the existing roadway from two to four lanes, and bicycle and/or pedestrian enhancements.	Contra Costa	x	x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T08-102	Principal Arterial	Roadway Widening | Brentwood Blvd, Phase 2 | Between Havenwood Ave and Homecoming Wy	This program includes funding to implement roadway widening on Brentwood Blvd between Havenwood Ave and Homecoming Wy. Improvements include widening the existing roadway from two to four lanes; a new parallel bridge over Marsh Creek; bicycle and/or pedestrian enhancements; and other roadway improvements, such as traffic signal modifications.	Contra Costa	x	x	x
25-T08-103	Principal Arterial	Roadway Widening | Crow Canyon Rd | Between Alcosta Blvd and Indian Rice Rd	This program includes funding to implement roadway widening on Crow Canyon Rd between Alcosta Blvd and Indian Rice Rd. Improvements include widening the existing roadway from four to six lanes, and bicycle and/or pedestrian enhancements.	Contra Costa	x	x	x
25-T08-104	Principal Arterial	Roadway Widening | Lone Tree Wy | Between O'Hara Ave and Brentwood Blvd	This program includes funding to implement roadway widening on Lone Tree Wy between O'Hara Ave and Brentwood Blvd. Improvements include widening the existing roadway from two to four lanes.	Contra Costa		x	x
25-T08-105	Principal Arterial	Roadway Extension | New Connector Road | Between Vasco Rd and Byron Hwy ("Vasco Road-Byron Connector")	This program includes funding to implement a roadway extension between Vasco Road south of Camino Diablo and Byron Hwy east of the Byron Airport. Improvements include extending a new two-lane highway and bicycle and/or pedestrian enhancements on Camino Diablo, Walnut Blvd, Concord Ave, Byron Hwy, and the Armstrong Rd extension.	Contra Costa		x	x
25-T08-106	Principal Arterial	Roadway Widening | Camino Tassajara Rd | Between Windemere Pkwy and the Alameda County Line	This program includes funding to implement roadway widening on Camino Tassajara Rd between Windemere Pkwy and the Alameda County Line. Improvements include widening the existing roadway from two to four lanes, and bicycle and/or pedestrian enhancements.	Contra Costa		x	x
25-T08-107	Principal Arterial	Roadway Widening | Pittsburg-Antioch Hwy | Between Auto Center Dr and Loveridge Rd	This program includes funding to implement roadway widening on Pittsburg-Antioch Hwy between Auto Center Dr and Loveridge Rd. Improvements include widening the existing roadway from two to four lanes, and new turning lanes.	Contra Costa		x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T08-108	Principal Arterial	Roadway Extension | West Leland Rd, Phase 1b | Between Santa Teresa Dr and the Concord City Limits	This program includes funding to implement a roadway extension on West Leland Rd between Santa Teresa Dr and Concord City Limits. Improvements include extending the four-lane roadway and bicycle and/or pedestrian enhancements.	Contra Costa		x	x
25-T08-109	Principal Arterial	Roadway Widening | Willow Pass Rd | Between Lynwood Dr and SR-4	This program includes funding to implement roadway widening on Willow Pass Rd between Lynwood Dr and SR-4. Improvements include widening the existing roadway from two to four lanes, and bicycle and/or pedestrian enhancements.	Contra Costa		x	x
25-T08-110	Principal Arterial	Roadway Improvements | SR-29 | SR-12/SR-121	This program includes funding to implement roadway improvements on SR-29 at SR-12/SR-121. Improvements include intersection enhancements and operational enhancements.	Napa			
25-T08-111	Principal Arterial	Roadway Improvements | Soscol Ave | Between Magnolia Dr and Silverado Trl (SR-121)/3rd St/East Ave/Coombsville Rd	This program includes funding to implement roadway improvements on Soscol Ave between Magnolia Dr and Silverado Trl (SR-121)/3rd St/East Ave/Coombsville Rd. Improvements include operational and bicycle and/or pedestrian enhancements.	Napa		x	x
25-T08-112	Principal Arterial	Roadway Improvements | SR-29 | Airport Blvd	This program includes funding to implement roadway improvements on SR-29 at Airport Blvd. Improvements include reconstructing the intersection to a grade-separated, double roundabout "dogbone" interchange.	Napa		x	x
25-T08-113	Principal Arterial	Roadway Improvements | SR-29 | Between Napa Junction Rd and American Canyon Rd	This program includes funding to implement roadway improvements on SR-29 between Napa Junction Rd and American Canyon Rd. Improvements include intersection enhancements, and operational and multimodal enhancements.	Napa			
25-T08-114	Principal Arterial	Roadway Improvements | Montague Expwy | McCarthy Blvd/O'Toole Ave	This program includes funding to implement roadway improvements on Montague Expwy at McCarthy Blvd/O'Toole Ave. Improvements include grade separations.	Santa Clara			

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T08-115	Principal Arterial	Roadway Widening | Calaveras Blvd | Between Abel St and Milpitas Blvd	This program includes funding to implement roadway widening on Calaveras Blvd at Union Pacific RR. Improvements include widening the Calaveras Blvd (SR-237) overpass at the Union Pacific RR tracks from four to six lanes between Abel St and Town Center Blvd.	Santa Clara		x	x
25-T08-116	Principal Arterial	Roadway Widening | Montague Expwy | Between Great Mall and McCarthy Blvd/O'Toole Ave	This program includes funding to implement roadway widening on Montague Expwy between Great Mall and McCarthy Blvd/O'Toole Ave. Improvements include widening the existing roadway from six to eight lanes, and new HOV lanes between Trade Zone Blvd and Great Mall Blvd.	Santa Clara	x	x	x
25-T08-117	Principal Arterial	Roadway Widening | Brokaw Bridge | Coyote Creek	This program includes funding to implement roadway widening on Brokaw Bridge at Coyote Creek. Improvements include widening the existing roadway to six lanes with a new westbound lane on Brokaw Rd.	Santa Clara		x	x
25-T08-118	Principal Arterial	Roadway Widening | Oakland Rd | Between US-101 and Montague Expwy	This program includes funding to implement roadway widening on Oakland Rd between US-101 and Montague Expwy. Improvements include widening the existing roadway from four to six lanes and operational enhancements.	Santa Clara		x	x
25-T08-119	Principal Arterial	Roadway Improvements | Almaden Expwy | Branham Ln ("Envision Expressway, Tier 1")	This program includes funding to implement roadway improvements on Almaden Expwy at Branham Ln. Improvements include extending the existing southbound lane to Branham Ln.	Santa Clara		x	x
25-T08-120	Principal Arterial	Roadway Improvements | Almaden Expwy | SR-85 ("Envision Expressway, Tier 1")	This program includes funding to implement roadway improvements on SR-85 at Almaden Expwy.	Santa Clara		x	x
25-T08-121	Principal Arterial	Roadway Improvements | Foothill Expwy | Between I-280 and Homestead Rd ("Envision Expressway, Tier 1")	This program includes funding to implement interchange improvements at Foothill Expwy between I-280 and Homestead Rd. Improvements include extending Stevens Creek Trail, new auxiliary lanes, and operational improvements.	Santa Clara		x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T08-122	Principal Arterial	Roadway Improvements | Lawrence Expwy | Homestead Rd ("Envision Expressway, Tier 1")	This program includes funding to implement roadway improvements on Lawrence Expwy at Homestead Rd.	Santa Clara		x	x
25-T08-123	Principal Arterial	Roadway Improvements | Oregon-Page Mill Rd | I-280 ("Envision Expressway, Tier 1")	This program includes funding to implement interchange improvements on Oregon-Page Mill Rd at I-280. Improvements include interchange improvements and bicycle and/or pedestrian enhancements.	Santa Clara		x	x
25-T08-124	Principal Arterial	Roadway Improvements | San Tomas Expwy | SR-17 ("Envision Expressway, Tier 1")	This program includes funding to implement roadway improvements on San Tomas Expwy at SR-17. Improvements include operational enhancements, such as signalized ramps and lane reconfigurations, on the northbound off-ramp.	Santa Clara		x	x
25-T08-125	Principal Arterial	Roadway Widening | Capitol Expwy | Between I-680 and Capitol Ave ("Envision Expressway, Tier 1")	This program includes funding to implement roadway widening and interchange modification on Capitol Expwy between I-680 and Capitol Ave. Improvements include widening the existing roadway from six to eight lanes, interchange improvements, and bicycle and/or pedestrian enhancements.	Santa Clara		x	x
25-T08-126	Principal Arterial	Roadway Widening | Oregon-Page Mill Rd |Between I-280 and Foothill Expwy ("Envision Expressway, Tier 1")	This program includes funding to implement roadway widening and trail extension on Oregon-Page Mill Expwy between I-280 and Foothill Expwy. Improvements include widening the existing roadway from four to six lanes with a possible HOV lane, intersection improvements, and bicycle and/or pedestrian enhancements.	Santa Clara		x	x
25-T08-127	Principal Arterial	Roadway Widening | San Tomas Expwy | Between Homestead Rd and Stevens Creek ("Envision Expressway, Tier 1")	This program includes funding to implement roadway widening and trail extension at San Tomas Expwy between Homestead Rd and Stevens Creek. Improvements include widening the existing roadway from 6 to 8 lanes, extending San Tomas Aquino Spur Trails, and pedestrian enhancements.	Santa Clara		x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T08-128	Principal Arterial	Roadway Widening | Santa Teresa-Hale Corridor | Between Long Meadow Dr and Fitzgerald Ave ("Envision Expressway, Tier 1")	This program includes funding to implement roadway widening and trail extension on Santa Teresa Blvd between Long Meadow and Fitzgerald. Improvements include widening the existing roadway from two to four lanes.	Santa Clara		x	x
25-T08-129	Principal Arterial	Roadway Widening | Jepson Pkwy-Leisure Town Rd, Phase 1B, 1C | Between Elmira Rd and Horse Creek Bridge	This program includes funding to implement roadway widening on Jepson Pkwy-Leisure Town Rd between Elmira Rd and Sequoia Dr and Horse Creek Bridge. Improvements include widening the existing roadway from two to four lanes between Elmira Rd and Sequoia Dr and between Sequoia Dr and Horse Creek Bridge; and safety and bicycle and/or pedestrian enhancements.	Solano	x	x	x
25-T08-130	Principal Arterial	Roadway Extension | Jepson Pkwy-Walters Rd | Between Cement Hill Rd and Huntington Dr	This program includes funding to implement a roadway extension on Walters Rd between Cement Hill Rd and Huntington Dr. Improvements include extending the four-lane roadway and a grade separated overpass.	Solano	x	x	x
25-T08-131	Principal Arterial	Roadway Widening | Jepson Pkwy-Vanden Rd, Phase 2B, 2C | Between Canon Rd and Vacaville City Limits	This program includes funding to implement roadway widening on Vanden Road between Canon Rd and the Fairfield/Vacaville city limit. Improvements include widening Vanden Rd from two to four lanes.	Solano		x	x
25-T08-132	Principal Arterial	Roadway Widening | Peabody Rd | Between Vacaville and Fairfield	This program includes funding to implement roadway widening on Peabody Rd between Vacaville and Fairfield. Improvements include widening the existing roadway to two lanes in each direction, and bicycle and/or pedestrian enhancements.	Solano		x	x
25-T08-133	Principal Arterial	Roadway Extension | Caufield Ln | Between Bautista Wy and Crystal Ln ("Caulfield Bridge Crosstown Connector")	This program includes funding to implement a roadway extension on Caufield Ln between Bautista Wy and Crystal Ln/Petaluma Blvd S. Improvements include extending the two-lane roadway and bicycle and/or pedestrian enhancements.	Sonoma		x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T11-139	Bus	Rapid Bus | Modernization | AC Transit | E 14th St/Mission St/Fremont Blvd Between San Leandro and Warm Springs	This program includes funding to implement improvements to existing bus service along E 14th St/Mission St/Fremont Blvd between San Leandro and Fremont, including dedicated lanes, mobility hubs at BART stations, and frequency upgrades (10-20 minute peak headways on routes 10 and 99).	Alameda			x
25-T11-141	Bus	Rapid Bus | Modernization | AC Transit	This program includes funding to implement improvements to existing bus service in Alameda County. Improvements include dedicated lanes, new/improved transit signal priority (including on-street and on-bus equipment), queue jumps, improved stop infrastructure, and frequency upgrades (5-12 minute peak headways on routes 6, 18, 20, 21, 40, 57, 97 and NL).	Alameda	x	x	x
25-T11-143	Bus	Rapid Bus | Modernization | AC Transit | San Pablo Ave	This program includes funding to implement improvements to existing bus service along San Pablo Ave between Oakland and Richmond. Improvements include dedicated lanes, improved stop infrastructure, merging of local/rapid stops, and frequency upgrades (5 minute peak headways on route 72).	Alameda, Contra Costa		x	x
25-T11-147	Bus	Rapid Bus | Modernization | AC Transit | 23rd St	This program includes funding to implement new bus rapid transit service along 23rd St between Richmond and Hercules, including dedicated lanes, transit signal priority, queue jumps, improved stop infrastructure, and new rolling stock (10 minute peak headways).	Contra Costa		x	x
25-T11-148	Bus	Rapid Bus | Service Expansion | Contra Costa Co | Between Antioch and Brentwood	This program includes funding to implement new bus service, assumed to be operated by Tri-Delta Transit, along SR-4 between Antioch and Brentwood, including dedicated lanes and park-and-ride facilities (20 minute peak headways).	Contra Costa		x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T11-150	Bus	Ferry and Express Bus | Service Expansion | GGT	This program includes funding to implement new ferry service between Larkspur and San Francisco (Mission Bay) (30 minute peak headways); new express bus service from Greenbrae and Petaluma to San Francisco and between San Rafael and El Cerrito (30-40 minute peak headways); improvements to existing ferry service between Larkspur and San Francisco (Ferry Building), including frequency upgrades (20 minute peak headways); and improvements to existing express bus service along US-101 and I-580, including frequency upgrades (20-30 minute peak headways on routes 101, 114, 132, 154, and 580).	Marin, San Francisco	x	x	x
25-T11-155	Bus	Rapid Bus | Modernization | SFMTA | Geneva Ave/Harney Wy	This program includes funding to implement improvements to existing bus service along Geneva Avenue/Harney Way in San Francisco. Improvements include dedicated lanes, transit signal priority, improved stop infrastructure, and frequency upgrades (5-7.5 minute peak headways on routes 29, 44, and HPX).	San Francisco			x
25-T11-156	Bus	Rapid Bus | Modernization | SamTrans | El Camino Real	This program includes funding to implement improvements to existing bus service along El Camino Real between Daly City and the San Mateo/Santa Clara County line. Improvements include dedicated lanes (45% of route), transit priority infrastructure, transit signal priority, and frequency (7.5 minute peak headways on route ECR).	San Mateo			x
25-T11-157	Bus	Express Bus | Modernization | VTA | SR-85	This program includes funding to implement improvements to express bus service along SR-85 between Mountain View and San Jose. Improvements include dedicated transit lanes and four stations.	Santa Clara	x	x	x
25-T11-158	Bus	Rapid Bus | Modernization | VTA | El Camino Real	This program includes funding to implement improvements to existing bus service along El Camino Real between Palo Alto and San Jose. Improvements include dedicated lanes, transit signal priority, improved stop infrastructure, and new rolling stock.	Santa Clara		x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T11-164	Ferry	Ferry | Service Expansion | WETA | Berkeley-San Francisco	This program includes funding to implement new ferry service between San Francisco (Ferry Building) and Berkeley, including a new terminal in Berkeley (30 minute peak headways).	Alameda, San Francisco	x	x	x
25-T11-165	Ferry	Ferry | Service Expansion | WETA | Oakland-Redwood City	This program includes funding to implement new ferry service between Oakland and Redwood City, including a new terminal in Redwood City (60 minute peak headways).	Alameda, San Mateo			x
25-T11-166	Ferry	Ferry | Service Frequency Upgrades | WETA	This program includes funding to implement improvements to existing ferry service from San Francisco (Ferry Building) to Oakland, Alameda (Main Street), Alameda (Harbor Bay), Alameda (Seaplane Lagoon), Vallejo, Richmond, and South San Francisco. Improvements include ZEV conversion and frequency upgrades (20-30 minute peak headways).	Regional	x	x	x
25-T11-167	Rail	Rail | Service Expansion | BART | Irvington Station	This program includes funding to implement a new BART infill rail station in Fremont (Irvington). Improvements include park-and-ride facilities and changes to existing AC Transit bus service (routes 212 and 215 replaced by flex service; frequency upgrade to 20 minute headways on route 210).	Alameda			x
25-T11-168	Rail	Rail | Service Expansion | Capitol Corridor | to Coast Subdivision ("South Bay Connect")	This program includes funding to implement improvements to existing Capitol Corridor rail service between Oakland and Newark. Improvements include relocation of rail service between Oakland Coliseum and Newark from the Niles Subdivision to the Coast Subdivision, one new rail station, one new in-line intermodal bus facility, and enhanced park-and-ride facilities.	Alameda	x	x	x
25-T11-169	Rail	Rail | Service Expansion | ACE | System	This program includes funding to implement new ACE intercity rail service between Merced and San Jose (1 daily round trip) and from Chico and Merced to Union City (3 daily round trips), including a new station in Union City.	Alameda, Santa Clara	x	x	x

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T11-170	Rail	Rail | Service Expansion | Capitol Corridor | Hercules Station ("Hercules Hub")	This program includes funding to implement a new Capitol Corridor infill rail station in Hercules, including bus connections and roadway and trail extensions.	Contra Costa	x	x	x
25-T11-171	Rail	Rail | Service Expansion | Caltrain | Bayview Station	This program includes funding to implement a new Caltrain infill rail station in San Francisco (Bayview), with the station location to be determined through an ongoing location study.	San Francisco	x	x	x
25-T11-172	Rail	Light Rail | Modernization | Muni Metro	This program includes funding to implement improvements to existing Muni light rail service in San Francisco. Improvements include reliability improvements in the Market Street Subway; infrastructure and rail signaling upgrades; removal of stop signs and signalization at intersections; transit signal priority; routing changes; and frequency upgrades (6 minute peak headways on routes J, K, L, M, N, and T).	San Francisco		x	x
25-T11-173	Rail	Rail | Service Frequency Upgrades | BART | System ("Core Capacity")	This program includes funding to implement improvements to existing BART rail service. Improvements include frequency upgrades (12 minute peak headways on all lines).	Regional	x	x	x
25-T11-174	Rail	Grade Separations and Modernization | Regional	This program includes funding to implement grade separation improvements along passenger rail corridors throughout the region, including the Caltrain/High-Speed Rail Corridor. Improvements include grade separations funded by Santa Clara County's Measure B and San Mateo County's Measure A, as well as future grade separations and other modernization improvements within the Bay Area's urban core that serve the dual purpose of connecting High Speed Rail to the Bay Area and improving the Caltrain system.	Regional			

RTPID	State Route/ Facility	Title	Scope	Location	2030	2040	2050
25-T11-175	Rail	Rail | Service Frequency Upgrades | Caltrain | Systemwide	This program includes funding to implement improvements to existing Caltrain rail service between San Francisco and San Jose. Improvements include frequency upgrades to be implemented in Phase 1 (6 trains per hour per direction in peak) and Phase 2 (8 trains per hour per direction in peak).	Regional	x	x	x
25-T12-177	Rail	Rail | Service Expansion | Between San Joaquin County and Dublin/Pleasanton ("Valley Link")	This program includes funding to implement new rail service between San Joaquin County (Mountain House) and Dublin/Pleasanton, including three new stations in Alameda County and four-car trains (12 minute peak headways).	Alameda		x	x
25-T12-178	Rail	Rail | Service Expansion | Caltrain/High Speed Rail | Downtown San Francisco ("Portal")	This program includes funding to extend Caltrain rail service in San Francisco between 4th St/Townsend St and the Salesforce Transit Center. Improvements include two new stations.	San Francisco		x	x
25-T11-179	Rail	Light Rail | Service Expansion | VTA | Eastridge	This program includes funding to extend VTA's existing Orange Line service from Alum Rock Station to the Eastridge Transit Center. Improvements include two new stations and elevated structures.	Santa Clara	x	x	x
25-T12-180	Rail	Rail | Service Expansion | BART | Santa Clara ("Silicon Valley Phase II")	This program includes funding to extend BART's Green Line and Orange Line rail services between San Jose (Berryessa) and Santa Clara. Improvements include four new stations and park-and-ride facilities.	Santa Clara		x	x
25-T12-181	Rail	Rail | Service Expansion | SMART | Healdsburg	This program includes funding to extend SMART rail service between Windsor and Healdsburg. Improvements include one new station in Healdsburg.	Sonoma	x	x	x
25-T12-182	Rail	Rail | Service Expansion | SMART | Cloverdale	This program includes funding to extend SMART rail service between Healdsburg and Cloverdale. Improvements include one new station in Cloverdale.	Sonoma		x	x

Appendix D. Projects in the Amended 2025 TIP

County	Sponsor	Project Name	Project Description	TIP ID	RTP ID	Air Quality Description	Conformity Analysis Year
Non-Exempt Projects							
Alameda	ACTC	Oakland/Alameda Access Project	Between Fallon Street and Washington Street: Reconfigure interchanges and intersections to improve connections between I-880, the Posey and Webstertubes and the downtown Oakland area. Removal, reconstruction and reconfiguration of ramps with I-880 and I-980 including a new horseshoe connector between Posey Tube and I-880, removal of NB I-880/Broadway off-ramp viaduct, construction of a new through 6th Street connecting Oak Road to Broadway, reconstruction of Westbound I-980/Jackson Street off-ramp, widening of the NB 880 Oak St off-ramp, construction of new sidewalks, bicycle lanes and bike paths, intersection improvements, and local street modifications in downtown Oakland, China Town, Jack London Square, and within City of Alameda.	ALA070009	21-T06-024	Non-Exempt (N/A) - N/A	2030
Alameda	Hayward	Rt 92/Clawiter/Whitesell Interchange Improvements	Hayward: Rt 92/Clawiter Rd: Upgrade existing Clawiter interchange. Add ramps and overcrossing for Whitesell St. extension. Signalize ramp intersections.	ALA090016	21-T06-041	Non-Exempt (N/A) - N/A	2040
Alameda	Hayward	I-880 Auxiliary lanes at Industrial Parkway	Hayward: I-880 NB between Industrial Pkwy and Alameda Creek I-880 SB between Industrial Pkwy and Whipple Rd: Construct auxiliary lanes	ALA090020	21-T06-024	Non-Exempt (N/A) - N/A	2030
Alameda	Hayward	I-880/Industrial Parkway West Interchange	In Hayward: At I-880/Industrial Parkway West: Reconstruct the interchange including replacement of overcrossing structure and a new 2-lane northbound off-ramp by realigning a section of Ward Creek. Realign northbound diagonal on-ramp, widen and realign southbound off-ramp, construct a southbound loop on-ramp to provide a HOV bypass. Create an auxiliary lane along northbound I-880 between Industrial Parkway West Interchange and Whipple Road/Industrial Parkway Southwest Interchange by restriping existing lanes and shoulders. This project includes widening of local streets to provide dedicated bikeways and sidewalks, signalization modifications and construction of a multi use bike and pedestrian path over the new overcrossing structure.	ALA110002	21-T06-024	Non-Exempt (N/A) - N/A	2030
Alameda	Dublin	Dublin Blvd. - North Canyons Pkwy Extension	Alameda County, Dublin and Livermore: Dublin Blvd-North Canyons Parkway from Fallon Rd to Croak Rd: Construct six lane extension Dublin Blvd-North Canyons Parkway from Croak Rd to Doolan Rd: Construct four lane extension. The new extended street is planned to have bike lanes, off-street Class I trail, sidewalks, landscaping curb and gutter, traffic signals, a raised median, bus stops, and all street utilities. This project will consider the provision of dedicated transit lanes and/or queue jump lanes in addition to the mixed flow travel lanes for higher level of transit service with 10 to 20 minute headways during appropriate peak demand periods. This project will also require enhanced multimodal connectivity to various land uses along its stretch and at its terminus, including creating connectivity to 5 PDAs in two cities.	ALA150003	21-T07-056	Non-Exempt (N/A) - N/A	2030
Alameda	ACTC	East Bay Greenway Phase 2	Generally along the BART alignment from Fruitvale BART station to South Hayward BART station: Construct a regional trail facility comprised of Class I and Class IV bikeway facilities that generally follows the BART alignment from Fruitvale Station to South Hayward Station. The project would span approximately 13 miles, traversing East Oakland, San Leandro, Ashland/Cherryland, and Hayward. The project would utilize a combination of BART and Union Pacific Railroad (UPRR) Oakland Subdivision rights-of-way as well as adjacent streets including San Leandro Streets, San Leandro Blvd, and Whitman St. Many sections of the project will be constructed under the elevated BART tracks. Two road diet segments are included, from 47th Ave. to Seminary Ave. in Oakland and from Broadmoor Blvd. to Peralta Ave. in San Leandro, and intersections will be modified at various locations for enhanced bicycle and pedestrian safety.	ALA150008	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Alameda	ACTC	State Route 262 (Mission Blvd) Improvements	In Fremont: Mission Blvd/I-680 IC: Implement interchange improvements at I-680, new freeway lanes between I-680 and I-880 that create grade separations at Mohave Drive and Warm Springs Boulevard. Reconstruct local access with one-way frontage roads between Warm Springs Boulevard and I-680. The project construction will likely be phased to construct a fundable project that meets independent utility.	ALA170001	21-T06-046	Non-Exempt (N/A) - N/A	2050
Alameda	ACTC	I-880/Whipple Rd Industrial Pkwy SW I/C Imps	Union City/Hayward: at I-880/Whipple Rd Interchange: Implement interchange improvements including widening and reconfiguration of northbound diagonal off-ramp, northbound off-ramp, northbound diagonal on-ramp, northbound on-ramp widening of Industrial Parkway Southwest, an auxiliary lane on northbound I-880 from the Alvarado Niles Road interchange to the Whipple Road-Industrial Parkway SW interchange, local street intersection improvements, and construction of ped/bike improvements.	ALA170005	21-T06-024	Non-Exempt (N/A) - N/A	2030
Alameda	ACTC	I-680 Express Lanes from SR84 to Alcosta Boulevard	Alameda and Contra Costa Counties: SB I-680 from SR-84 to north of Alcosta Blvd: express lane improvements (Phase 1) NB and SB I-680 from SR-84 to north of Alcosta Blvd: Widen for express lanes (Phase 2). Project limit in Alameda County are PM10.6 to PM21.9 and in Contra Costa County are PM0.0 to PM1.1	ALA170009	21-T12-116	Non-Exempt (N/A) - N/A	2030
Alameda	MTC	Bay Bridge Forward - West Grand HOV/Bus Only Lane	Oakland: Along W Grand Ave from Mandela Pkwy through the I-80 on-ramp: Phase 1 of the project was completed in 2019, where a portion of shoulder (approximately 1,300 feet) at the on-ramp was converted to a bus/HOV lane. Phase 2 of the project will convert approximately half a mile of the existing right shoulder on West Grand Avenue to a bus lane in the westbound direction, between the Frontage Road intersection and the on-ramp to the Bay Bridge. The lane will be designated as a full-time bus lane, while allowing high occupancy vehicles (HOVs) to access the lane during the peak commute hours. In addition, the project will also provide a multiuse path for bicyclists and pedestrians along the eastbound direction on West Grand Avenue, utilizing the existing sidewalk and right shoulder, between Maritime Street and Mandela Parkway.	ALA170011	21-T06-049	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Alameda	ACE	ACE Platform Extensions	ACE System: At Fremont, Pleasanton, Livermore, Vasco, Tracy, and Manteca stations: Extend existing ACE platforms to accommodate longer train sets	ALA170042	21-T11-105	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled

Alameda	Dublin	I-580 Interchange Imps at Hacienda/Fallon Rd, Ph 2	In Dublin: I-580/Fallon Rd I/C: Phase 2 reconstruct overcrossing to provide four-lanes in each direction, reconstruct the southbound to eastbound loop on-ramp, widen the eastbound off-ramp to provide two exit lanes with two left turn and two right tum lanes, widen the eastbound on-ramp, widen the westbound off-ramp to provide two left turn and two right turn lanes, and widen the westbound on-ramp, add new bicycle lanes and sidewalks to close a significant gap in these modes I-580 Hacienda Drive Interchange: Reconstruct overcrossing to provide additional northbound lane, widen the eastbound off-ramp to include a third left-turn lane, modify the westbound loop on-ramp, and widen the westbound off-ramp to include a third left-turn lane, and add new bicycle lanes and sidewalks to close a significant gap in these modes. The project will be phased.	ALA170045	21-T06-019	Non-Exempt (N/A) - N/A	2040
Alameda	Hayward	I-880 I/C Improvements (Winton Ave and A St)	Hayward: I-880/A St. I/C: Reconstruct interchange, add bike lanes, modify signals and reconfigure intersections to improve truck-turning maneuvers. The interchange reconstruction will provide Caltrans with additional width on the I-880 mainline to accommodate auxiliary lanes in each direction between the I-880/Winton Avenue and I-880/A Street interchanges. This project has potential/conditional funding through Local Area Transportation Improvement Program (LATIP).	ALA170046	21-T06-024	Non-Exempt (N/A) - N/A	2030
Alameda	ACTC	7th Street Grade Separation West	Oakland: Within the Port: Implement roadway and rail improvements including realigning and grade separating the intersection of 7th Street and Maritime St and constructing a rail spur underneath connecting the Joint Intermodal Terminal and the Oakland Harbor Intermodal Terminal yard, also reconstruct and widen the existing multi-use path.	ALA170086	21-T07-055	Non-Exempt (N/A) - N/A	2030
Alameda	MTC	Bay Bridge Forward: Alameda I-580 WB HOV Lane Ext	Alameda County: On I-580 westbound approach to the San Francisco-Oakland Bay Bridge toll plaza from the SR 24/I-980 interchange to I-80: convert one general purpose lane to an HOV lane. This is part of Bay Bridge Forward 2020.	ALA190018	21-T06-049	Non-Exempt (N/A) - N/A	2025
Alameda	AC Transit	AC Transit: Quick Builds Transit Lanes	Berkeley: Durant Ave between Ellsworth and College Oakland: MacArthur Blvd between Alma Ave and 13th Ave: Design and construct "red carpet" bus only lanes and minor bus improvements such as bus bulbs.	ALA210018	21-T10-065	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Alameda	Oakland	West Oakland Howard Terminal Downtown	Between West Oakland, Downtown Oakland, the Port of Oakland, and Jack London District: Provide connectivity with major improvements along several corridors serving the area. Market Street between the railroad tracks and 8th Street would be improved with at-grade railroad crossing improvements, new and modified traffic signals, lane geometric changes, bike lanes, and sidewalks. A transit hub would be constructed on 2nd Street generally between Brush Street and Broadway. Within the Jack London District, west of Broadway, there are several sidewalk gaps along 3rd Street that would be closed. Access between the Port and I-880 via Adeline Street would be improved with new and modified traffic signals and lane geometric changes. 8th Street from Martin Luther King Jr Way (MLK) to Fallon Street will be improved to enhance pedestrian safety and access to the Lake Merritt BART Station. Freeway undercrossings at five locations (I-980 at 7th St, I-880 at Market Street, I-880 at MLK, I-880 at Washington St, and I-880 at Broadway) will be improved to reconnect communities currently separated by dark, uninviting spaces. All intersection changes along the stated corridors would include improved pedestrian crossing treatments. The project also includes railroad corridor improvements including at-grade railroad crossing improvements between Schnitzer Steel and Oak Street, and a grade separated over crossing at Adeline Street. Last, this project includes intersection safety changes at Brush Street intersection with 17th and 18th Streets, Martin Luther King Jr. Way at 17th Street, and Castro Street at 5th Street.	ALA210023	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Alameda	Oakland	Oakland Grand Avenue Roadway Improvements	Oakland: Grand Ave between MacArthur and Mandela: Enhance alternative transportation opportunities to connect diverse communities with jobs, education, services, and various regional transportation connections. This project will implement improvements to bus operations, walking, and biking without impeding the necessary goods movement by freight. These improvements will include transit signal priority, bus only lanes, a continuous bike facility, sidewalk improvements, and a road diet on Grand Avenue between Mandela and Macarthur (from four lanes to two lanes).	ALA210024	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Alameda	Dublin	Tassajara Road Widening	Dublin: Tassajara Road between North Dublin Ranch Drive and Quarry Lane School Road: Widen and improve approximately ? mile of Tassajara Road to a four-lane arterial standard, with buffered bike lanes, sidewalks, landscaped median, stormwater treatment areas, and other associated street improvements including pavement replacement, grinding/overlay, and cross slope correction operations, new and revised striping. The widening project will increase the capacity of Tassajara Road and accommodate future traffic in the next 10 to 15 years generated by several approved developments in eastern Dublin and in Contra Costa County. PBA2050 ID is 21-T07-056	ALA210026	21-T07-056	Non-Exempt (N/A) - N/A	2030
Alameda	MTC	BBF: I-80 WB Bus Only Lane Extension	Alameda County: On I-80 westbound between SFOBB Toll Plaza and Powell Street interchange: Construct a bus only or HOV lane to reduce transit delays and increase reliability. When completed, the project will extend the existing bus lane on I-80 approaching the (SFOBB) Toll Plaza to the Powell Street westbound on-ramp that serves as a queue jump lane for buses to bypass congestion and improve operations.	ALA210028	21-T06-049	Non-Exempt (N/A) - N/A	2030
Alameda	CCJPA	CCJPA SR84 Intermodal Bus Facility	Fremont: On SR84 near the Ardenwood Park-n-Ride: Construct an intermodal bus facility including the addition of westbound and eastbound bus stop platforms on SR84, allowing buses to pick-up and drop-off passengers from the Park-n-Ride at the elevated highway level. This will reduce bus travel time, especially during congestion, since buses will not need to get on and off SR84 to pick up and drop off passengers using the Park-n-Ride	ALA210033	21-T11-111	Non-Exempt (N/A) - N/A	Not Modeled
Alameda	Fremont	Irvington BART Station	Fremont: Along the BART corridor in the Irvington District, adjacent to the future alignment of the East Bay Greenway and the future Sabercat Trail (north fork): Construct a new BART station	ALA230004	21-T11-104	Non-Exempt (N/A) - N/A	2030
Alameda	Valley Link	Valley Link Rail System (Phase 1)	Construction of a new 22-mile, four-station passenger rail system between the Dublin/Pleasanton BART station in Alameda County and the Mountain House Community Services District in San Joaquin County including stations at Isabel Avenue and Southfront Road in the City of Livermore.	ALA230204	21-T11-114	Non-Exempt (N/A) - N/A	2030
Alameda	Port of Oakland	Port of Oakland Green Power Microgrid	Plan, design, and install 145 chargers for battery-electric heavy duty trucks and cargo handling equipment in the Seaport; and 1 megawatt (MW) of solar panels; and up to 6.5 MW of battery storage; and associated substation upgrades. This project will support and accelerate the transition of heavy-duty equipment from diesel to zero emissions, in alignment with the Port's Seaport Air Quality 2020 and Beyond Plan – the Pathway to Zero Emissions.	ALA250222	21-T07-055	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled

Alameda	Union City	East-West Connector: Decoto and Quarry Lakes Pkwy	Union City and Fremont: Decoto Rd from I-880 to SR-238 (Mission Blvd): Widen roadway and implement complete streets improvements. Decoto Complete Streets is a transit priority corridor with separate Class I system for bikes and pedestrians Quarry Lakes Pkwy alignment between Paseo Padre Pkwy and SR-238: Construct new, 4-lane multimodal corridor. QLP is a new four-lanes, multimodal corridor with buffer bike lanes and separated Class I trail for bikes and pedestrian with landscaped areas, street trees, and utilities to support the 100 acres Union City BART Station PDA. Project will be constructed in usable phases to support new housing developments, access to Union City BART Station and complete trail connections. PBA2050 ID is 21-T07056. Other State funds are SR-84 LATIP funds	ALA978004	21-T07-056	Non-Exempt (N/A) - N/A	2040
Contra Costa	CCTA	I-680/SR 4 I/C Reconstruction - Ph 1,2a,4	Contra Costa County. I680/SR4 I/C. Phase 1: NB680 to WB SR4 Connector, construct a two-lane flyover direct connector from NB680 to WB SR4 and remove the existing NB680 to WB SR4 loop, construct auxiliary lanes, a slip ramp and install a ramp metering facility. Phase 2A: extend the SB680 collector-distributor ramp and install a ramp metering facility for the WB SR4 on-ramp. Phase 4: Construct Southbound I-680 to Eastbound SR 4 connector.	CC-010023	21-T06-022	Non-Exempt (N/A) - N/A	2030
Contra Costa	Hercules	Hercules Intercity Rail Station	Hercules: At future train station: Relocate the Kinder Morgan pipeline, Shell pipeline, fiber optic line construct the 3rd track for the new station, construct the new station building, multi-use trail, retaining walls, and parking structure.	CC-030002	21-T11-115	Non-Exempt (N/A) - N/A	2030
Contra Costa	Richmond	I-80/Central Avenue - Local Portion	Richmond: I-80/Central Ave Interchange: Improve traffic operations, increase spacing between signalized intersections east of I-80, relocate signal at Pierce St/Central Ave to San Mateo St/Central Ave, convert Pierce St at Central Ave to "right in, right out" access, Construct new roadway between San Mateo St and Pierce St. Project elements include new and removed signals, pavement resurfacing/reconstruction, widened turn pocket, street parking reconfiguration, striping, undergrounding/relocation of power/telecom poles as needed with local funds, underground utility adjustments, relocation of bus stops with possible bus shelter, parking lot reconfiguration, class III bike route, landscaping and bioretention, new and replacement street lighting, and sidewalk, curb ramp, driveway apron, and curb and gutter improvements. PBA2050 ID: 21-TO6-013	CC-050076	21-T06-013	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Contra Costa	Brentwood	Brentwood Boulevard Widening - North (Phase I)	Brentwood: Brentwood Boulevard from Havenwood Avenue to Homecoming Way: Phase I-Widen from 2 to 4 lanes, with two lanes in each direction with two bike lanes, curbs, gutters, medians, sidewalks, street lights and landscaping on each side of the roadway, including a new parallel bridge over Marsh Creek, traffic signal modification at Brentwood Boulevard / Grant Street, and moving overhead power lines, telephone lines and cable lines underground. CIP 336-3162.	CC-070011	21-T07-056	Non-Exempt (N/A) - N/A	2030
Contra Costa	Concord	SR 242 / Clayton Road Interchange Improvements	Concord: At the SR242/Clayton Rd Interchange: Construct NB on-ramp and SB off-ramp. On ramp will access NB SR242. SB SR242 Off-ramp will intersect Franquette Way near the Clayton west Rd intersection. Current phase- PSR phase to evaluate interchange and local road improvement alternatives. CCTA Website: http://www.ccta.net/projects/project/97	CC-070024	21-T06-045	Non-Exempt (N/A) - N/A	2040
Contra Costa	CCTA	Reconstruct I-80/San Pablo Dam Rd Interchange Phas	San Pablo: At the I-80/San Pablo Dam Rd (SPDR) I/C: Reconstruct I/C, includes providing access to McBryde Ave through a new connector. Project will enhance operations and safety for autos, pedestrians, and bicyclists in the vicinity of the interchange.	CC-070035	21-T06-013	Non-Exempt (N/A) - N/A	2030
Contra Costa	Contra Costa County	Byron Highway - Vasco Road Connection	Contra Costa County: Construct an east-west connection road between Byron Highway and Vasco Road in unincorporated Byron.	CC-070081	21-T06-047	Non-Exempt (N/A) - N/A	2040
Contra Costa	CCTA	SR 4 Integrated Corridor Management	Contra Costa County: Along SR 4 between I-80 in Hercules to the SR 4/SR 160 Interchange in the City of Antioch: create an integrated and arterial network along the SR 4 from I-80 in Hercules to the SR 4/SR 160 interchange in Antioch.	CC-150013	21-T07-057	Non-Exempt (N/A) - N/A	2040
Contra Costa	Brentwood	Brentwood Boulevard Widening - North (Phase II)	Brentwood: Brentwood Blvd. between Homecoming Way and Lone Tree Way: Widen existing roadway from 2 to 4 lanes for 2600 linear feet including curb, gutter , sidewalk, bike lanes, street lights and landscaping	CC-170015	21-T07-056	Non-Exempt (N/A) - N/A	2030
Contra Costa	Contra Costa County	Camino Tassajara Realignment, S of Windemere Pkwy	Contra Costa County: Camino Tassajara between Windemere Parkway and the City of Dublin: Realign curves along Camino Tassajara, widen roadway to four lanes, and install Class II bike lanes. The project will be coordinated with the City of Dublin to tie into existing improvements along Tassajara Road.	CC-170016	21-T07-056	Non-Exempt (N/A) - N/A	2030
Contra Costa	CCTA	I-680 NB Express Lane Completion	Contra Costa County: NB I-680 from Livorna Rd to Arthur Rd. 1) From Livorna Rd to SR-242: Extend Managed Lane; 2) From SR-242 to Arthur Rd: Convert Existing HOV Lane to Express Lane; 3) From N Main St to Treat Blvd: Operational improvements; and 4) Various locations along NB I-680: Install limited access buffers and mitigation projects.	CC-170017	21-T12-116	Non-Exempt (N/A) - N/A	2030
Contra Costa	CCTA	SR-4 Operational Improvements - Initial Phases	State Route 4 Operational Improvements - Eastbound: (a) Extend a lane from the lane drop at Port Chicago Interchange to the Willow Pass Rd off-ramp and end as a mandatory exit lane. (b)Construct a new general purpose lane between the Willow Pass Rd off-ramp and the Willow Pass Rd on-ramp. The new general purpose lane would eliminate the mandatory exit at Willow Pass Rd off-ramp from (a) and connect to the existing auxiliary lane between Willow Pass Rd on-ramp & San Marco Blvd off ramp. Construct a second exit lane at the EB SR4 off-ramp to San Marco Blvd to accommodate existing and future peak hour traffic volumes. (c) Construct auxiliary lane from the San Marco Blvd loop on ramp to the existing deceleration lane at Bailey Rd off-ramp. (d) Construct an auxiliary lane between the Port Chicago Highway on-ramp and the Willow Pass Road off-ramp. Westbound: Construct a lane from Willow Pass Rd on-ramp connecting to the existing added lane, east of the Port Chicago Highway off-ramp and a second exit lane at Port Chicago Highway off-ramp. Modify one of the mandatory exit lanes to SR242 to an optional exit lane, allowing three lanes exit to SR242 and three lanes to continue on WB SR4. RTP ID: 21-T06-031	CC-170018	21-T06-031	Non-Exempt (N/A) - N/A	2030

Contra Costa	Oakley	Civic Center Railroad Platform Park n Ride Complex	Oakley: Main Street between 2nd Street and O'Hara Avenue: construct two parking lots (approximately 150 spaces each) on a portion of one City owned parcel covering a total of approximately 104,000 square feet, or 2.38 acres. The project components consist of site clearing, curb and gutter, vertical curb, storm drain system, street and parking lot paving, landscaping and irrigation, electrical and communications infrastructure for the parking lots and a future train platform, signing and striping, and design and construction management. The project will also include fencing, lighting, and bicycle racks. The parking lots project is the first step toward the construction of a train platform at this location. The future train platform will be part of an expanded service to be established and operated by the San Joaquin Joint Powers Authority (SJJPA), which operates the rail service line. The train platform is identified as a potential stop in the recently updated 2016 SJJPA Business Plan. The new parking lots in Oakley will provide the infrastructure necessary for connection to an accessible rail transportation system for the multi-modal movement of goods and people. Constructing a train platform before there is parking to serve it is not practical unless there is parking located near it. At present, there is little to no parking near this location. The future train platform will also be regional in nature as there is no train platform in nearby Brentwood. The future train platform would serve Discovery Bay, Knightsen, Bethel Island and Byron, in addition to Oakley. The City of Oakley is working in collaboration with the San Joaquin JPA and also working on finding other funding mechanisms for the train platform. The City anticipates applying for federal Transportation Investment Generating Economic Recovery (TIGER) discretionary grant funds in addition to other available funding for the train platform.	CC-170019	21-T11-105	Non-Exempt (N/A) - N/A	Not Modeled
Contra Costa	CCTA	I-680 Part Time Transit Lane	In Contra Costa County: On NB I-680 between Bollinger Canyon Road and Ygnacio Valley Rd: Increase bus service efficiency by implementing bus operations on shoulder (BOS). Conduct testing and training at GoMentum Station. PBA2050 ID: 21-T12-122	CC-170061	21-T12-122	Non-Exempt (N/A) - N/A	2030
Contra Costa	San Ramon	Crow Canyon Road (Alcosta to Indian Rice) Widening	San Ramon: Crow Canyon Rd from Alcosta Blvd to Indian Rice Rd: Widen to three lanes in each direction. Work will be completed in two phases. Phase 1 limits: Alcosta to St. George. Phase 2 limits: St. George to Indian Rice Road. PBA 2050 ID 21-T07-056	CC-190001	21-T07-056	Non-Exempt (N/A) - N/A	2030
Contra Costa	SJRC	Oakley Station Platform	Oakley: North of Main Street between 2nd St and O'Hara Ave: Construct a new train station platform for the Amtrak San Joaquin inter-city rail service. Constructs a station track siding with two turnouts, within the existing railroad right-of-way. Includes shelters, lighting, signage, ADA-compliant pedestrian sidewalks and other associated improvements.	CC-190002	21-T11-115	Non-Exempt (N/A) - N/A	2025
Contra Costa	MTC	RSR Forward: ORT and I-580 WB HOV Lane	Contra Costa County: On westbound I-580 approaching the Richmond-San Rafael (RSR) Bridge beginning at the I-580 / Regatta Avenue Interchange: Provide safety and operational improvements by converting one of the three existing general-purpose lanes to a high-occupancy vehicle (HOV) lane and replacing the existing tolling structure with overhead toll gantries east of the existing toll booths. PBA 2050 ID: 21-T06-020	CC-210010	21-T06-020	Non-Exempt (N/A) - N/A	2030
Marin	TAM	US 101 HOV Lanes - Marin-Sonoma Narrows (Marin)	Marin and Sonoma Counties: From SR 37 in Novato to Old Redwood Highway in Petaluma Convert expressway to freeway and widen to 6 lanes for HOV lanes. Provide funds for TAM management, oversight, and coordination with Caltrans for the PSE phase. Funds include the following: HPRR #2444 (100% of the total $12Million Earmark) a portion of HPP #3762 ($1.5M of the total $15M Earmark) and FY05/06 Annual Appropriation (100% of the total $850k Earmark). Also includes completed Phase 1 work.	MRN050034	21-T06-026	Non-Exempt (N/A) - N/A	2025
Marin	San Anselmo	San Anselmo - Center Blvd Bridge Replace (27C0079)	San Anselmo: Center Blvd Bridge over San Anselmo Creek, at Sycamore Ave: Replace existing 2 lane bridge with 3 lane bridge	MRN110032	21-T01-004	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Marin	GGBHTD	Golden Gate Ferry: New Vessel	GGBHTD: 1 vehicle: Purchase a new, 500-passenger, high-speed ferry vessel to continue to provide expanded commute service from Larkspur and Tiburon to San Francisco.	MRN190001	21-T11-094	Non-Exempt (N/A) - N/A	2030
Marin	GGBHTD	GGBHTD Replacement Ferry CARB Compliance	Replacement of 4 catamarans to comply with CARB regulation	MRN230205	21-T01-002	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Marin	MCTD	US101 Part Time Transit Lane	US 101 Part Time Transit Lane Project (PTTL) is a proposed pilot project on the shoulder of the southbound US 101, in Marin County between Delong Avenue in Novato and Mission Avenue in San Rafael. This project will improve bus travel times for Marin County Transit District (Marin Transit) and Golden Gate Transit Services during peak congestion. This project has been identified as a low cost way to provide highly visible transit priority for transit buses and provide significant time travel savings for bus riders.	MRN230206	21-T10-093	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Napa	NVTA	SR 12/29/221 Soscol Junction Interchange Imps.	In Napa County: At SR-221/SR-29 Soscol Ferry Road: Construct improvements	NAP090003	21-T06-034	Non-Exempt (N/A) - N/A	2025
Napa	American Canyon	Eucalyptus Drive Realignment Complete Streets	American Canyon: Eucalyptus Dr. from Theresa Rd to Hwy 29: Extend Eucalyptus 450' to the east, connecting at SR 29. Construct travel lanes, median, curb, gutter and sidewalk, Class 1 bicycle facilities, landscaping, striping, signage, drainage and traffic signal improvements. Complete the 4th leg of the Eucalyptus/SR29 intersection. Improvements at the Rio del Mar/SR 29 intersection necessary to make the intersection right-in/right-out only. Close Theresa Avenue from Los Altos to Eucalyptus (approx. 140') and construct improvements to create a pedestrian/bicycle corridor.	NAP110029	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Napa	NVTA	NVTA- Vine Transit Bus Maintenance Facility	NVTA's transit services arm- Vine Transit has a need for a new transit maintenance yard. The present facility at 720 Jackson Street just north of downtown has an inadequate number of bus maintenance bays and does not have adequate parking spaces or all of Vine's vehicles and lacks space for a modern bus wash. NVTA has purchased an 8 acre site in south Napa County and proposes constructing a transit maintenance yard. When completed, the facility will include - Parking for up to 100 transit vehicles of various sizes, Administration Building. Modern Bus Washer, Maintenance Building with up to 8 bays, 75 parking spaces for employees and visitors. The new facility will improve reliability on current operations, allow for the service and charging of current and future electric vehicles, and provide for service expansion.	NAP170003	21-T01-002	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled

Regional/Multi-County	WETA	Ferry Service - Berkeley	WETA: Includes development of new ferry service, the acquisition of vehicles and the development and construction of a new terminal in the Berkeley area of Alameda County.	MTC050027	21-T11-096	Non-Exempt (N/A) - N/A	2030
Regional/Multi-County	MTC	Freeway Performance Initiative (FPI)	Regionwide: Design, implement and maintain ramp metering, Traffic Operation Systems (TOS), and other Freeway Performance Initiative (FPI) projects on major congested freeways throughout the region.	REG090003	21-T06-048	Non-Exempt (N/A) - N/A	Multiple Years
Regional/Multi-County	BART	BART: Railcar Procurement Program	Fund the replacement of all existing 669 railcars for BART when the cars reach the end of their useful life and procure new railcars. Project also references RTP IDs 240182, 240196, and 21132. Project is related to REG050020. Costs for an additional 60 cars are included in SCL110005 and costs for an additional 23 cars are included in BRT030001 for a total of 873 cars.	REG090037	21-T01-002	Non-Exempt (N/A) - N/A	2040
Regional/Multi-County	BART	BART Transbay Core Capacity Improvements	BART: Systemwide: Implement a multi-pronged effort to address capacity issues in the Transbay corridor and is in coordination with the BART Metro Program project. The project elements are: Communication-based train control (CBTC) system to safely enable closer headways and allow BART to operate more frequent service (12 minute frequencies) Expansion of the rail car fleet by 306 vehicles to add cars to existing trains and operate more frequent trains Added traction power substations to allow more frequent service. Project also references 17-10-0016	REG170017	21-T11-106	Non-Exempt (N/A) - N/A	2030
Regional/Multi-County	BAIFA	ALA/CC-80 and Bay Bridge Approach Express Lanes	Alameda/Contra Costa counties: On I-80 from the Carquinez Bridge to Powell and the Bay Bridge Approaches (I-80, I-580, I-880 and Toll Plaza): Convert HOV lanes to express lanes. Work includes but is not limited to installation of gantries, tolling/traffic monitoring equipment and systems (hardware/software), signage, electrical, communications and fiber, lighting, and restriping, as well as police observation areas for enforcement.	VAR170003	21-T12-116	Non-Exempt (N/A) - N/A	2030
Regional/Multi-County	MTC	Freeway Performance Program: SR-84	Alameda & San Mateo Counties: Along the Dumbarton Corridor: Deliver operational strategies to improve traffic operations along the SR-84 Dumbarton Corridor, including adaptive ramp metering, advanced technologies, arterial/transit priority signal upgrades, higher vehicle occupancy strategies, and bicycle access improvements along the Dumbarton Corridor. The freeway performance program (FPP) is a comprehensive operations program that diagnoses key transportation problems, assesses and recommends specific mitigations, and implements recommended mitigations within available resources and partnership support. More specifically, major transportation corridors are analyzed and effective operational strategies for congestion mitigation and demand management are identified and prioritized. FPP delivers cost-effective operational strategies (such as adaptive ramp metering, and HOVs, advanced technologies, arterial/transit priority signal upgrades, higher vehicle occupancy strategies, and bicycle access) that complement and support the successful implementation of other regional and local transportation programs, including incident management strategies, Integrated Corridor Management (ICM) strategies, Connected Vehicles, and the Regional Express Lane Network. It also looks to implement person throughput strategies and policy changes called for in the Managed Lanes Implementation Plan. Overall, the FPP planning and capital projects aim to better manage and operate Bay Area freeways, arterials, and transit systems.	VAR170023	21-T06-049	Non-Exempt (N/A) - N/A	2030
Regional/Multi-County	MTC	SR 37 Interim Project - Sears Point to Mare Island	Solano and Sonoma Counties: SR-37 between the Sears Point/SR 121, and Mare Island: Implement a high occupancy vehicle (HOV) lane, implement tolling. This project will improve traffic flow and peak travel times, and increase vehicle occupancy (the number of people moved per vehicle). This project provides an incentive to increase multiple occupant vehicle use during peak periods. Currently there is no incentive for a bus route on SR 37 because of the substantial delays and there are no current transit routes using SR 37. The Napa Bus Feasibility Study identified a demand for bus service through the corridor, and this project would allow transit operators to implement bus service on SR 37. Other State funds are SB170 funds. Other Federal funds are NHPP	VAR210004	21-T06-035	Non-Exempt (N/A) - N/A	2030
Regional/Multi-County	SMART	SMART Rail and Pathway (Phase 2)	Marin and Sonoma Counties: Sonoma County Airport Station to Windsor: Extend rail and pathway (includes freight rail); Petaluma North at Corona Rd: Construct infill station (includes freight rail gauntlet tracks); McInnis to Smith Ranch in San Rafael, Hanna Ranch Rd. to S. Rowland Blvd. in Novato, Lakeville to Payran in Petaluma, Southpoint in Petaluma to Penngrove at Main St, Rohnert Park at Golf Course to Southwest Santa Rosa at Bellevue, Southwest Santa Rosa to Santa Rosa SMART Station (Joe Rodota Trail to 3rd St), San Miguel Rd. to Airport Blvd. in Santa Rosa: Construct multi-use pathway. Project also references RTP IDs 21-T11-201 and 21-T08-060. Other Federal funds are FRA PTC funds.	VAR210005	21-T11-113	Non-Exempt (N/A) - N/A	2030
San Francisco	SFMTA	SF Muni Third St LRT Phase 2 - New Central Subway	Extend the Third Street Light Rail line into a new subway generally in a north-south alignment under Fourth Street to Market, then under Geary to Stockton, and under Stockton to Clay Street. Includes procurement of four LRVs.	SF-010037	21-T10-083	Non-Exempt (N/A) - N/A	2025
San Francisco	TBJPA	Transbay Terminal/Caltrain Downtown Ext: Ph. 2	San Francisco: From Fourth/Townsend to Salesforce Transit Center: Extend Caltrain /High Speed Rail to Downtown San Francisco (DTX) Extend Caltrain rail service from 4th St/Townsend St in San Francisco to Salesforce Transit Center in downtown San Francisco, including two new stations: Phase 2 of the Transbay Transit Center program is the extension of the Caltrain commuter rail service from its current San Francisco terminus at Fourth and Townsend Streets to a new underground terminus beneath the Salesforce Transit Center building. Plan Bay Area 2050 RTP ID: 21-T11-110	SF-050002	21-T11-110	Non-Exempt (N/A) - N/A	2030
San Francisco	SFMTA	Historic Streetcar Extension to Fort Mason	San Francisco: From Fisherman"s Wharf through National Park Service lands in Aquatic Park to Fort Mason: This proposed extension of historic streetcar service would extend the proposed E-line or the current F-line service from Fisherman"s Wharf through National Park Service lands in Aquatic Park and Fort Mason, using the historic railway tunnel between the foot of Van Ness Avenue and the Fort Mason Center. Environmental studies are now getting underway on this proposed project. Project has been funded for Alternatives Analysis and EIS only and no construction or operation schedule has been set.	SF-070003	21-T10-082	Non-Exempt (N/A) - N/A	2030

San Francisco	SFMTA	Geary Bus Rapid Transit	San Francisco: Along the Geary corridor between 34th Avenue and Market Street (including Geary Boulevard and Geary and O'Farrell streets): Design and implement transit performance and safety improvements. Scope elements include dedicated transit-only lanes, upgraded bus stops with amenities, new and upgraded traffic signals, upgraded corridor communication systems, pedestrian bulbs, traffic calming, and other pedestrian safety and accessibility measures. The Geary BRT project will be delivered in two phases. The first phase, the Geary Rapid Project, includes the Geary corridor between Market and Stanyan streets. Major scope elements include side-running transit-only lanes, bus and pedestrian bulbs, removal of the Steiner pedestrian overcrossing, introduction of new signalized pedestrian crossings, and a lane reduction along the Geary Expressway between Scott and Gough streets. The second phase, the Geary Boulevard Improvement Project, includes Geary Boulevard between Stanyan Street and 34th Avenue in the Richmond district. Major scope elements include side-running transit-only lanes, bus bulbs, traffic signal upgrades, and pedestrian safety measures. The projects will be coordinated with SF Public Utilities Commission-sponsored water and sewer upgrades as well as SF Public Works-sponsored roadway re-paving to minimize construction impacts to the community.	SF-070004	21-T10-079	Non-Exempt (N/A) - N/A	2030
San Francisco	SF DPW	Harney Way Roadway Widening	San Francisco: Harney Way from US 101 to Jamestown: Improvements include right-of-way engineering, land acquisition for future widening of roadway, design, landscaping and sidewalk improvements, roadway construction, and traffic signal improvements. Project will acquire land on the East side of Harney Way between Executive Park Boulevard East and Executive Park Boulevard West. Widening project will accommodate two additional mixed flow lanes and two exclusive bus rapid transit lanes between US 101 and Jamestown. (Segment F.b.) Project is phased	SF-090004	21-T07-056	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Francisco	SFMTA	Light Rail Vehicle Procurement	SFMTA: Fleet-wide: Procure 219 light rail vehicles with an option for an additional 45 vehicles to replace existing fleet and expand service. The contract with Siemens calls for an array of replacement (151) and expansion vehicles (113). State-of-the-art vehicles will be equipped with innovative safety features, improved passenger amenities and modern information systems. $16.8M of funding for vehicles to serve Central Subway accounted for in TIP ID SF-010037 (Central Subway Project).	SF-090012	21-T01-002	Non-Exempt (N/A) - N/A	2040
San Francisco	SFMTA	Transit Center in Hunters Point	Muni:Transit Center in Hunters Point Construct 10 bays, Low-level platform, Operator restroom, bus shelters, platform communications and monitoring network (signals, closed circuit TVs, etc.), sidewalks and roadway, Electrical ductbank for MUNI power, lighting for transit stations	SF-090016	21-T10-063	Non-Exempt (N/A) - N/A	2040
San Francisco	SFMTA	Geneva Harney BRT Infrastructure: Central Segment	SFMTA: Bus rapid transit facilities from Executive Park/Harney Way under US 101 to SF/Daly City line on Geneva Avenue. Includes pedestrian/bicycle treatments and special bus shelters/landscaping/art for identity.	SF-090020	21-T10-080	Non-Exempt (N/A) - N/A	2040
San Francisco	SFMTA	Geneva Harney BRT Infrastructure - Eastern Segment	SFMTA: Bus rapid transit facilities from Executive Park/Harney Way to Hunters Point Transit Center via Candlestick/Hunters Pt. Shipyard development. Includes pedestrian/bicycle treatments and special bus shelters/landscaping/art for identity.	SF-090023	21-T10-080	Non-Exempt (N/A) - N/A	2040
San Francisco	SF DPW	Hunters Pt Shipyard and Candlestick Pt Local Roads	In San Francisco: Hunters Point Shipyard and Candlestick Point: Build new local streets to support multi-modal mixed use development. Includes roadway, streetlights, streetscape, traffic signals, overhead signs, sidewalks, curbs, and gutters. The project is phased.	SF-110006	21-T10-063	Non-Exempt (N/A) - N/A	Not Modeled
San Francisco	SFCTA	Treasure Island Congestion Pricing Program	San Francisco: Treasure Island: Implement Congestion Pricing Program on Treasure Island including parking pricing and tolling of vehicles entering and exiting Treasure Island as a TDM toll for planned redevelopment of Treasure Island. Does not show $500k in Regional PDA Plng (included in REG110014) and $5,500,000 in Federal ATCMTD	SF-110049	21-T10-092	Non-Exempt (N/A) - N/A	2040
San Francisco	SF DPW	SF- Better Market Street Transportation Elements	In San Francisco: Phase 1: Market St, from 5th Street to 8th Street; Future Segments: from Octavia to 8th Street and from 5th Street to Fremont Street: improve roadway, including resurfacing, sidewalk improvements, way-finding, lighting, landscaping, transit boarding islands, transit connections, traffic signals, transportation circulation changes and utility relocation and upgrade. The project also includes installation of the F Loop, which will improve efficiency of the historic streetcar F Line.	SF-130001	21-T08-060	Non-Exempt (N/A) - N/A	2020
San Francisco	SFCTA	Treasure Island Pricing Mobility Improvements	San Francisco: On Treasure Island: This project will deliver mobility improvements associated with the Treasure Island Congestion Pricing Program. Multi-modal mobility improvements include transit capital, operating & maintenance and bicycle & pedestrian improvements.	SF-130005	21-T10-092	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Francisco	SFCTA	HOV/HOT Lanes on U.S.101 and I-280 in SF	San Francisco: On US 101 from SF/SM County line to I-280 interchange and on I-280 from US 101 interchange to 6th Street offramp: Convert a mixed traffic lane in each direction to HOV to enhance carpool and transit operations during peak periods in order to complement HOV lanes through San Mateo county and/or as part of a potential/demonstration congestion charging program in SF and project develop for converting to HOT lanes	SF-130008	21-T12-116	Non-Exempt (N/A) - N/A	2030
San Francisco	SFCTA	SF Downtown Congestion Pricing	San Francisco: In the downtown area: Implementation of a demonstration value pricing (tolls and incentives) program in the San Francisco downtown area.	SF-130017	21-T10-091	Non-Exempt (N/A) - N/A	2030
San Francisco	SFCTA	Quint-Jerrold Connector Road	San Francisco: From Oakdale Avenue to Jerrold Avenue: SF has proposed the Quint-Jerrold Connector Road as alternate access route between Oakdale and Jerrold Avenues and across the Caltrain tracks. The project is to be coordinated with Caltrain's Quint Street Bridge Replacement project which closed Quint Street through access beneath the Caltrain tracks at that location. The Bridge Replacement project replaced the existing bridge structure with a berm, which would facilitate the potential future siting of a Caltrain Oakdale Station.	SF-150008	21-T07-056	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled

San Francisco	Port of SF	Mission Bay Ferry Terminal	San Francisco: At the eastern terminus of 16th St: Construct new ferry landing to service San Francisco Mission Bay and Central Waterfront as a part of the Bay area ferry transit system. The Mission Bay Ferry Landing will serve 350,000 annual weekday passengers plus 125,000 people traveling to special events each year. The new ferry landing will enable critical Transbay and regional ferry service to and from the fastest growing neighborhood of San Francisco and the East and North Bays. It will also provide a direct regional link to the new 550-bed University of California Mission Bay hospital campus and approved 18,000-seat Golden State Warriors arena. The landing is projected to open for revenue service between 2020 and 2022, adding vital regional transit capacity within the next five years that will alleviate current overcrowding, serve planned future growth and provide resiliency in the event of an earthquake, BART or Bay Bridge failure or other unplanned event. Service will be provided by San Francisco Bay's two ferry operators-the Water Emergency Transit Agency and Golden Gate Bridge and Highway District-with weekday morning and evening peak commute service linked from the downtown Ferry Building plus direct service for an estimated 80 annual special events at the arena.	SF-170001	21-T11-097	Non-Exempt (N/A) - N/A	2030
San Francisco	SF DPW	HOPE SF Street Network - Sunnydale and Potrero	Includes new and realigned street networks throughout the two remaining HOPE SF sites (Sunnydale and Potrero), including traffic calming pedestrian and bike network, and transit/shuttle stops.	SF-170013	21-T07-056	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Francisco	WETA	WETA: Electric Vessels and Related Infrastructure	WETA: Fleetwide: Support the purchase/construction of all-electric vessels and related charging infrastructure. This project supports medium sized routes using all-electric battery powered vessels. This project supports TIP ID SF-170001	SF-190008	21-T01-002	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Francisco	SFCTA	US 101 Doyle Drive Availability Payments	San Francisco: US 101 (Doyle Drive) from Lombard Street/Richardson Avenue to Route 1 Interchange: Availability payments for roadway replacement/rehabilitation project SF-991030	SF-190011	21-T01-006	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Francisco	SFMTA	SFMTA - Core Capacity Program	SFMTA: Along the K, J and M-Line Corridors: Design and implement high priority route improvements from the Muni Forward Program. Project includes a combination of transit signal priority, transit-only lanes, stop consolidation, and complementary facility and pedestrian improvements. Included in the award are a set of targeted improvements to two key rail corridors: the J and M-Lines and design for the K-line.	SF-190012	21-T10-084	Non-Exempt (N/A) - N/A	2040
San Francisco	SFCTA	Hillcrest Road Improvement Project	In the City of San Francisco on Yerba Buena Island, from the intersection of Hillcrest Road & Forest Road to 0.25 miles west, north of the I-80 on-ramp. Construct a widened roadway and retaining walls including 8-ft shoulders, a Class II bike lane, and width to accommodate a future multi-use path.	SF-230211	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Francisco	SFMTA	I-280 Ocean/Geneva Interchange Improve. at Balboa	San Francisco: Implement interchange improvements that may include intersection geometry changes, traffic signal changes, and Intelligent Transportation System (ITS) elements in the Balboa Park Station area, including the I-280 Northbound Geneva Ave and I-280 Southbound Ocean Ave off-ramps, to improve traffic circulation and safety for pedestrians & bicyclists. The project will coordinate with Caltrans, SFMTA, and SFPW.	SF-250201	21-T06-016	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
San Mateo	Redwood City	Blomquist Street Extension	Redwood City: On Blomquist Street from Maple Street to Bair Island Road: Extend roadway across Redwood Creek. Project may be phased based on developer funding.	SM-090007	21-T07-056	Non-Exempt (N/A) - N/A	Not Modeled
San Mateo	San Carlos	US101/Holly St I/C Mod and Bike/Ped Overcrossing	San Carlos: At Holly St/ US-101 Interchange: Widen east bound to north bound ramp to two lanes and eliminate north bound to west bound loop and construct a grade-separated multipurpose path that connects the east side of Highway 101 to the west	SM-090008	21-T06-027	Non-Exempt (N/A) - N/A	2030
San Mateo	CCAG	Improve US 101 operations near Rte 92	San Mateo: At the US 101/SR 92 interchange: Improve traffic flow, safety and increase mobility by minimizing traffic conflict locations and improving peak-period travel times along US 101 and SR 92 within project limits.	SM-090014	21-T06-027	Non-Exempt (N/A) - N/A	2030
San Mateo	Redwood City	Redwood City Ferry Service	SF Bay Area: Between Redwood City and San Francisco/Oakland: Environmental clearance and design of ferry transit service	SM-110002	21-T11-098	Non-Exempt (N/A) - N/A	2030
San Mateo	SSF	US 101/Produce Avenue Interchange Improvements	On Route US 101 in San Mateo County, in the City of South San Francisco (PM 21.3/21.7). Reconstruction and reconfiguration of the interchange, as follows: Extend Utah Avenue to the west over US 101 to connect with San Mateo Avenue and provide access to southbound US 101 on-/off-ramps at Produce Avenue construct new sidewalks and Class 2 bike lanes on both sides of the east-west local street connection' remove some of the non-standard features at this location, and provide new ramp configurations at Produce Avenue provide more direct access to US 101 to better accommodate land use and employment changes and help separate freeway bound traffic from the surrounding local streets.	SM-110003	21-T06-027	Non-Exempt (N/A) - N/A	2030
San Mateo	CCAG	US101 Managed Lanes: Santa Clara Co-S of Grand Ave	San Mateo County: On US 101 between 2 miles south of the Santa Clara County Line (P.M. 50.6 in SCL) and 0.3 mi south of Grand Avenue Interchange (SM 21.8): Install Express Lanes. Utilize existing auxiliary lanes where possible and restore auxiliary lanes where needed for operations. SMCTA is co-sponsoring project.	SM-150017	21-T12-116	Non-Exempt (N/A) - N/A	2025
San Mateo	Pacifica	Manor Drive Overcrossing and Milagra On Ramp	In Pacifica: Hwy 1 and Manor Drive I/C: Widen the existing overcrossing over Hwy 1 at Manor Drive and install traffic signals to better facilitate traffic. The project will also look at an on ramp option at Milagra Dr.	SM-170004	21-T06-030	Non-Exempt (N/A) - N/A	2030
San Mateo	San Mateo	US 101/Peninsula Avenue Interchange Improvements	San Mateo: US-101 at Peninsula Ave and East Poplar Ave: Convert a partial interchange to a full interchange by adding new southbound on- and off-ramps and closing the southbound on- and off-ramps at East Poplar Avenue. The Project will improve safety by facilitating the closure of the Poplar on and off ramps which have a higher than average accident rate. It will improve local circulation for all modes in the project area by converting what is currently a partial interchange to a full interchange. Eliminates the circuitous travel patterns from S/B 101 to east of 101. Improves access into north San Mateo and south Burlingame residential and business destinations. Improves bicyclist and pedestrian circulation within the project limit.	SM-170011	21-T06-027	Non-Exempt (N/A) - N/A	2030

San Mateo	Caltrain	Peninsula Corridor Electrification Expansion	Caltrain: Electric Multiple Unit (EMU) fleet: Expand fleet through procurement of an additional 40 vehicles. This will build on the initial procurement of 96 EMUs through the Peninsula Corridor Electrification Project, which is fully funded and underway. This includes minor modifications to lengthen some station platforms to accommodate 8-car EMU's as well as wayside bike improvements.	SM-190002	21-T11-107	Non-Exempt (N/A) - N/A	2040
San Mateo	SamTrans	SamTrans Express Bus Service	San Mateo, San Francisco and Santa Clara Counties: On the US-101 Corridor between 1) Sunnyvale and San Bruno BART station, 2) Foster City and San Francisco, 3)Redwood City and San Francisco, and 4) San Mateo and San Francisco: Implement a network of four express bus routes. The launch of express bus service is envisioned to occur in conjunction with the opening of the managed lane on US-101 in San Mateo County. The project entails procuring a fleet of Electric buses, and related charging infrastructure to run the service, as well as associated bus stop and park-and-ride lot improvements. Other State funds are LCTOP	SM-190003	21-T12-119	Non-Exempt (N/A) - N/A	2030
San Mateo	CCAG	US-101 Managed Lanes North of I-380	San Mateo and San Francisco counties: On US-101 from I-380 to logical termini near the SM/SF County Line: Install managed lane (HOV or Express Lane) in each direction. SMCTA is co-sponsoring the project. Alternatives include (minimum) converting inside travel lane in each direction to managed lane and maintaining standard shoulder widths to the extent feasible plus outside widening to accommodate auxiliary lanes as necessary or (maximum) adding a lane in each direction and modifying under/over crossings and overheads of existing structures where necessary. Post Miles are SM 19.2/26.1 and SF 0.0/0.5.	SM-190009	21-T12-116	Non-Exempt (N/A) - N/A	2030
San Mateo	Millbrae	Widen Millbrae Avenue	Millbrae: Millbrae Avenue between Rollins Road and US101 Southbound On Ramp: Widen roadway/overpass and resurface the intersection of Millbrae Avenue and Rollins Road. Repairs include: AC overlay with ancillary work including pavement grinding, full depth asphalt repairs, adjusting utility frames and grates, install new sidewalk, replacing pavement markings and traffic signal detection devices including additional striping for class 2/4 bike trail for future connections to Old Bayshore Highway.	SM-210001	21-T07-056	Non-Exempt (N/A) - N/A	Not Modeled
San Mateo	CCAG	US 101/SR 92 Interchange Direct Connector Project	The project proposes to create a dedicated connection between State Route (SR) 92 and US 101 express lanes. This new connection would operate like the express lanes recently opened on US 101 in San Mateo County. Currently, there is no existing High Occupancy Vehicle (HOV) direct connector between US 101 express lanes and SR 92 that might provide incentives for carpool or bus use.	SM-250201	21-T06-027	Non-Exempt (N/A) - N/A	2040
Santa Clara	VTA	BART - Berryessa to San Jose Extension	San Jose: Six miles from Berryessa Station in north San Jose to Santa Clara: Extend BART by constructing 4 new stations, a tunnel through downtown San Jose, and a new maintenance / storage yard in Santa Clara. The project constructs new track and dedicated guideway, power systems, signal systems, and purchases new vehicles. The project also includes upgrades to the existing BART system, that are required to extend operations to San Jose/Santa Clara. Other State funds are TIRCP. PBA2050 ID is 21-T11-109	BRT030001	21-T11-109	Non-Exempt (N/A) - N/A	2030
Santa Clara	VTA	Eastridge to BART Regional Connector (EBRC)	In Santa Clara County, in the City of San Jose. This project will extend the existing Capitol Light Rail (LR) system by 2.4 miles from Alum Rock LR Station to Eastridge Transit Center. This extension will include an elevated rail station at Story Road with a pedestrian overcrossing, and a ground level station at the Eastridge Transit Center. Also, includes installation of two traction power substations to power the light rail system.	SCL050009	21-T10-087	Non-Exempt (N/A) - N/A	2030
Santa Clara	VTA	SR 152 New Trade Corridor	Santa Clara/ San Benito counties: SR152 between US101 and SR156: Complete PA&ED for new alignment of SR152 between US101 and SR156 in Santa Clara and San Benito counties, widening US 101 from Monterey Street to the SR 25/US 101 Interchange, modifying the existing SR 152/ SR 156 Interchange, and evaluating "corridor management" strategies for potential traffic users and roadway pricing.	SCL090016	21-T06-042	Non-Exempt (N/A) - N/A	Not Modeled
Santa Clara	Santa Clara Co	Montague Expwy Widening - Trade Zone-Great Mall	In Santa Clara County: Widen Montague Expressway to 8 lanes between Trade Zone and Great Mall Blvd: Designate new lanes between Trade Zone and Great Mall Blvd as HOV lanes.	SCL090017	21-T07-056	Non-Exempt (N/A) - N/A	2030
Santa Clara	VTA	SR 85 Express Lanes	Santa Clara County: On SR 85 carpool lane from US 101 in San Jose to US 101 in Mountain View including the US 101/SR 85 HOV direct connectors and approaches: Implement roadway pricing. Convert the existing HOV lanes on SR 85 in both directions from US 101 in South San Jose to US 101 in Mountain View to Express Lanes, including the US 101/SR 85 HOV direct connectors in South San Jose, add a second Express Lane in both directions between SR 87 and I-280, and add an auxiliary lane on SR 85 NB from existing South De Anza Boulevard on-ramp to Stevens Creek Boulevard off-ramp. The Silicon Valley Express Lanes Phase 3 project includes the conversion of carpool lanes to express lanes on SR-85 from SR237/Grant Road to the US 101/SR-85 Interchange in Mountain View including the existing US101/SR-85 carpool lane-to-carpool lane direct connector ramps. Deliver milestones reflect phase 4 of project.	SCL090030	21-T12-116	Non-Exempt (N/A) - N/A	2030
Santa Clara	VTA	Santa Clara County - US 101 Express Lanes	In Santa Clara County: Implement roadway pricing on US 101 carpool lane. Convert existing US 101 HOV lanes in both directions from Cochrane Avenue to the San Mateo County Line to Express Lanes, including the US 101/SR 85 HOV direct connectors in Mountain View, add a second Express Lane in both directions from Cochrane Road to SR 85 in San Jose and from Blossom Hill Road to Fair Oaks Avenue, convert the second HOV lanes in both directions from Shoreline Boulevard to south of Oregon Expressway to Express Lanes, and add auxiliary lanes at various locations. Construct new Express Lanes from Cochrane Ave to East Dunne Ave in Morgan Hill. The Silicon Valley Express Lanes Phase 3 project includes the conversion of single carpool lanes to express lanes on US101 from near SR-237 to SR-85 in Mountain View and the conversion of double carpool lanes to double Express Lanes on US101 from the US101/SR-85 interchange in Mountain View to near the San Mateo County line in Palo Alto.	SCL110002	21-T12-116	Non-Exempt (N/A) - N/A	2025
Santa Clara	San Jose	San Jose - Autumn Street Extension	In San Jose: Autumn St between Julian Street and San Carlos Street: widen, partially realign, and extend Autumn Street between Coleman and Park Avenue, approximately 1.1 miles.	SCL110006	21-T07-056	Non-Exempt (N/A) - N/A	2050

Santa Clara	San Jose	US 101/Old Oakland Road Interchange improvements	Oakland Rd from Commercial St to US 101: Widen roadway including the overcrossing to 8 lanes Commercial St from Oakland Rd to Berryessa Rd: Widen to add turn lanes Commercial St from Berryessa Rd to Mabury Rd: Extend roadway: US 101 on-ramps and off ramps: Widen to 3 lanes Various locations in area: modify signals	SCL190001	21-T06-028	Non-Exempt (N/A) - N/A	Not Modeled
Santa Clara	VTA	US 101/Zanker Road-Skyport Drive-N. Fourth St. Imp	San Jose: US101 at Zanker Rd/Skyport Dr./N. 4th St: Construct a new overcrossing over US 101 connecting Zanker Rd to Skyport Dr-N. Fourth St to create a new north-south corridor parallel to N. First St and modify existing US 101 on and off-ramps. Consolidate northbound US 101 ramps from Old Bayshore Blvd. to Brokaw Road/North First Street to new ramps at Bering Drive.	SCL190007	21-T06-028	Non-Exempt (N/A) - N/A	2030
Santa Clara	Milpitas	Calaveras Boulevard Improvements	Milpitas: Calaveras Blvd. (SR-237) overpass at UPRR tracks from Abel St to Town Center Blvd: Widen from 4 to 6 lanes and modify signing, striping and signals	SCL190009	21-T07-056	Non-Exempt (N/A) - N/A	2040
Santa Clara	VTA	US 101/Buena Vista Avenue Interchange Improvement	Gilroy: At Buena Vista Ave. overcrossing at US 101: Provide southbound on-ramp flyover structure to accommodate a braided ramp with exist. CHP Station Facility off-ramp, auxiliary lanes and bike/pedestrian facilities on the new overcrossing.	SCL190010	21-T06-028	Non-Exempt (N/A) - N/A	2030
Santa Clara	VTA	SR 17 Congestion Relief in Los Gatos	Los Gatos: On both direction of SR 17 from Lark Ave to south of SR 9 interchange and along SR-17 area: Operational improvements including modifying the SR17/SR9 off-ramps into signalized T intersections, widening SR-17, implementing advance transportation technology, and installing traffic signal control systems, traveler information systems and ramp meters.	SCL190014	21-T06-032	Non-Exempt (N/A) - N/A	2030
Santa Clara	Caltrans	SCL-SM I-280 Pavement Preserv. and HOV Extension	Santa Clara and San Mateo Counties: On I-280 from Foothill Blvd(PM 11.5 in Santa Clara County) to 0.5 mile north of Sand Hill Rd(PM R2.1 in San Mateo County): Pavement rehabilitation On SB I-280 from near Magdelena Ave south 3300 ft to existing HOV lane: Extend HOV lane	SCL190034	21-T06-016	Non-Exempt (N/A) - N/A	2025
Santa Clara	San Jose	Julian and St. James Couplet Conversion	San Jose: Along Julian St from Market St to 3rd St, St James St from Market St to 4th St, 3rd St from Julian St to St. John St: Convert 1-way to 2-way traffic to improve roadway functionality and safety for all roadway users and to improve neighborhood livability. Project would include: 1. Restriping the street for two-way traffic (one lane in each direction), 2. New and modified signals to accommodate two-way traffic and improve signal responsiveness for people walking and bicycling, 3. Streetlights (new pedestrian-scale lighting and conversion of existing lights to smart, energy efficient lighting) 4. Amenities for livability, traffic calming and complete streets, including street trees, wayfinding information, refurbishing non-functional fountains as planters, green backed bicycle sharrows, bike racks, accessible ramps, and high-visibility/decorative crosswalks.	SCL210026	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	2030
Santa Clara	Milpitas	South Milpitas Blvd Extension and Bridge	Milpitas: S. Milpitas Blvd over Penitencia Creek connecting to Tarob Ct: Extend roadway and construct bridge. The vehicular bridge is part of the Metro Area Specific Plan circulation infrastructure plan to provide vehicular, bicycle and pedestrian connectivity between Metro developments, Milpitas BART Station, Great Mall and surrounding residential developments.	SCL210035	21-T07-056	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Santa Clara	VTA	US 101/SR 25/Santa Teresa Boulevard Extension	Gilroy: Santa Teresa Boulevard from just north of the existing terminus at Castro Valley to the US 101/SR 25 Interchange: Extend roadway including bike lanes in both directions and reconstruct the Santa Teresa Boulevard/Castro Valley Road Intersection.	SCL230201	(blank)	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Santa Clara	San Jose	Story Keyes Complete Streets	The Story-Keyes Complete Streets Project spans 2.3 miles from 3rd Street to King Road, serving a regional commercial hub and multiple MTC Priority Development Areas. The project adds raised bikeways, protected intersections, transit boarding islands, wayfinding, micromobility stations, green stormwater infrastructure, and pedestrian-scale lighting and other improvements for bicyclists, pedestrians, and transit riders. Bus-only lanes are a potential element on the wider Story Road.	SCL230210	21-T08-060	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Santa Clara	Gilroy	Tenth Street Bridge at Uvas Creek	The project will construct a new bridge over Uvas Creek to connect two segments of Tenth Street. It will include two vehicular traffic lanes, a median, buffered bicycle lanes, and sidewalks on both sides. Tenth Street and Uvas Park Drive will be raised on the approach embankments. The project includes a breezeway bridge to allow users of the Uvas Creek Levee Trail to pass unimpeded under Tenth Street. To accommodate the realignment of Tenth Street and improve safety, the curb returns and driveway at Gilroy High School will be reconstructed to match grades and connect sidewalks. A roundabout will also be constructed at Tenth Street/Uvas Park Drive. Tenth Street improvements will include sidewalks, bikeways, crosswalks, restriping, signing, curb-and-gutter, storm drain, lighting, and repaving.	SCL250204	21-T07-056	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Solano	Fairfield	Fairfield/Vacaville Hannigan Station Improvements	Fairfield: Capitol Corridor: Project includes 800-foot passenger platform, covered passenger waiting areas, train/bus passenger transfer area including bus passenger transfer facility, park & ride lot, overcrossing and pedestrian undercrossing, traveler information kiosk.	SOL030002	21-T11-115	Non-Exempt (N/A) - N/A	2025
Solano	Dixon	Parkway Blvd/UPRR Grade Separation	Dixon: Parkway Blvd from Valley Glen Dr. to Pitt School Rd.: Construct new 4 lane roadway ad overcrossing at UPRR & Porter Rd connecting the southeast to the southwest side of town. The overpass will connect to a future 4-lane roadway with both pedestrian and bicycle access. Project to also include permanent closure of the nearby at-grade railroad crossing on Pitt School Road. Scope of work includes right-of-way acquisition, environmental processing, underground utilities, drainage, barricades and fencing for at-grade closure, reconstruction of existing roadways and widening of shoulders to accommodate the new overpass.	SOL050009	21-T07-056	Non-Exempt (40 CFR 93.101) - Non-Exempt - Not Regionally Significant Project	Not Modeled
Solano	STA	I-80/I-680/SR 12 Interchange Improvements	Fairfield: I-80/I-680/Route 12 IC: Improve widen I-80 and I-680 as well as improve the connections from westbound I-80 to I-680 and SR12 (West) directly connect northbound I-680 and SR12 (West) connect the I-80/Red Top Road interchange with Business Center Drive and construct or improve interchanges at SR12 (West)/Red Top Road, I-80/Red Top Road, I-80/Green Valley Road, and I-680//Red Top Road. A third eastbound lane would be added to SR12 (East) from the Chadbourne Road on ramp to the Webster Street off ramp.	SOL070020	21-T06-015	Non-Exempt (N/A) - N/A	2040

Solano	Solano County	Redwood-Fairgrounds Dr Interchange Imps	Solano County: I-80/Redwood St. I/C and SR 37/Fairgrounds Dr. I/C: Implement I/C and safety improvements Fairgrounds Dr. between Redwood St. and SR 37 (2.1 lane miles): Remove left turn center lane and widen to add one lane in each direction. Add bike lanes on each side of the road for the entire length of the project and a transit improvements near SR37 to compliment STA's Solano Express expansion plans. Project is phased: Bike lanes, bus stop improvements, and intersection signalization improvements are scheduled be completed within the TIP period, expansion elements are scheduled to be completed after 2030	SOL090015	21-T06-015	Non-Exempt (N/A) - N/A	2030
Solano	MTC	Solano I-80 Managed Lanes	Solano County: I-80 from Red Top Rd to I-505: Convert existing HOV to Managed Lane I-80 from Air Base Parkway to I-505: Construct new Managed Lanes by widening to add an express lane in each direction. BATA Project Savings are for non-federally participating BAIFA and STA project elements.	SOL110001	21-T12-116	Non-Exempt (N/A) - N/A	2025
Solano	STA	Jepson: Walters Rd Ext - Peabody Rd Widening	Solano County: Jepson Parkway: upgrade and link a series of existing local two- and four-lane roadways (as well as construct an extension of an existing roadway under one alternative) to provide a four- to six-lane north-south travel route for motorists who face increasing congestion when traveling between jurisdictions in central Solano County. Remaining segments to construct are: Vanden from Peabody to Leisure Town Walters Road Extension Leisure Town from Vanden to Alamo Leisure Town from Alamo to Orange. One EIR/EIS provides environmental clearance for the remaining segments.	SOL110004	21-T07-056	Non-Exempt (N/A) - N/A	2030
Solano	STA	Jepson: Leisure Town Road Phase 1B and 1C	Vacaville: Leisure Town Road from Elmira Road to south side of Ulatis Creek: (Phase 1B funded) widen to 4 lanes with center median; add west linear setback, multiuse sidewalk, two new signal installations, and a new sewer junction structure; along with storm drain improvements, as well as hydrant and utility relocations. Leisure Town Road from south side of Ulatis Creek to Horse Creek: (Phase 1C unfunded) widen to 4 lanes, with west side setback landscaping and multiuse sidewalk, median, dependent on developer timing and funding. Phase project to comply with budget.	SOL110006	21-T07-056	Non-Exempt (N/A) - N/A	2030
Solano	Fairfield	Fairfield Transportation Center - Phase 3	In Fairfield: Fairfield Transportation Center: 3rd parking structure of 600 or more spaces at the site and construction of direct bus access, multi-use trail, as well as other ped and bike access improvements.	SOL110007	21-T10-093	Non-Exempt (N/A) - N/A	Not Modeled
Sonoma	SCTA	US 101 Marin/Sonoma Narrows (Sonoma)	Marin and Sonoma Counties: From SR37 in Novato to Old Redwood Highway in Petaluma: convert expressway to freeway Between Lakeville Highway and East Washington Street: Construct NB auxiliary lane, and widen to 6 lanes for HOV lanes. Programming in SON070004 is for MSN project in Sonoma County. For Marin project programming, see MRN050034. Earmark programmed on SON070004 for Sonoma County. Includes T-21 Demo #1340 (#3.1M of $5.6M), SAFETEA-LU HPP Earmark #1767 ($375K of $400K), SAFETEA-LU HPP Earmark #3763 ($50K of $500K), SAFTEA-LU HPP Earmark #3762 ($2,662K of $15M).	SON070004	21-T06-029	Non-Exempt (N/A) - N/A	2040
Exempt Projects							
Alameda	ACE	ACE Track Improvements.	ACE: From Stockton to San Jose: Corridor improvements for signaling, grade crossing, track and other cost associated	ALA010056	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
Alameda	San Leandro	SR 185- E. 14th St/ Hesperian Blvd/150th Ave	San Leandro: 150th/E. 14th/Hesperian: Additional Northbound left turn lane from Hesperian Blvd. to E. 14th St, additional Eastbound left turn lane from E.14th St. to 150th Ave and additional Southbound lane on E. 14th from Hesperian to 150th Ave. Other roadway improvements to improve traffic circulation and reduce delay time.	ALA050002	21-T07-056	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Alameda	ACTC	I-80 Gilman Interchange Improvements	Berkeley: On Gilman Ave at I-80: Reconfigure interchange. The dual roundabout will provide appropriate traffic control for all intersections within the I-80 Gilman Interchange area. The roundabout on the east side of the interchange will have a combination of two and one lanes as appropriate to maximize throughput based on forecast traffic volumes. It includes an exit and entrance for the Eastshore Highway (frontage road) on both sides, an entrance to the eastbound I-80 on-ramp, and an exit from the I-80 eastbound off-ramp. Also, a bypass lane from the off-ramp is provided for the southbound movement to the Eastshore Highway. The west roundabout, similar to the east roundabout, will have a combination of one and two travel lanes, as appropriate. It contains an entrance and exit to the West Frontage Road on the south side, an entrance to the I-80 westbound on-ramp, and an exit from the I-80 westbound off-ramp. EARMARK- HBRR- #1744 I-80. The bicycle/ pedestrian components of the full project include a new overcrossing structure dedicated to pedestrians and bicyclists plus segments of Class I Trail and Class IV bikeway that provide access to/from the overcrossing. The construction will be delivered in 2 phases. Phase 1 includes the construction of the new bicycle/pedestrian overcrossing over I-80. Phase 2 includes the construction of the double roundabout and roadway access to and from the roundabouts connecting surrounding facilities.	ALA050079	21-T09-061	Exempt (40 CFR 93.127) - Changes in vertical and horizontal alignment	Not Modeled
Alameda	Alameda County	Fruitvale Ave Roadway Bridge Lifeline	Alameda County: Fruitvale Roadway Bridge: Retrofit bridge to a lifeline facility and provide vital access between City of Alameda and City of Oakland in the event of a major earthquake	ALA090023	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Alameda	BART	BART: Fare Collection Equipment	BART: Systemwide: Acquire and install fare collection equipment.	ALA090065	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Alameda	ACTC	Alameda County Safe Routes to Schools	In Alameda County: Countywide: Safe Routes to Schools Program including education and outreach efforts in various elementary, middle, and high schools (grades K-12), along with ridesharing and project development activities. Includes cycle 4 ATP-funded, "Alameda County School Travel Opportunities Program" to bring education and encouragement activities to 70 new schools that have not previously had SR2S program.	ALA110033	21-EN09-132	Exempt (40 CFR 93.126) - Other - Grants for training and research programs	Not Modeled
Alameda	Oakland	Lake Merritt to Bay Trail Bike/Ped Bridge	Oakland: Over Embarcadero and UPRR tracks under I880 between the Estuary and Lake Merritt along the Channel: Construct ADA accessible bicycle pedestrian bridge. Project includes bike ped connection to adjacent trails. (Other State are Coastal Conservancy Funds)	ALA130003	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Alameda	Alameda County	Alameda Co-Various Streets and Roads Preservation	Unincorporated Alameda County: 164th Ave from Foothill Blvd to Liberty Street, Foothill Blvd from 164th Ave to John Dr, Stanley Blvd from Isabel Ave to CL, Bruns Rd from Kelso Rd to County LL, Kelso Rd from Mountain House Rd to County LL, Grove Way from Tanglewood to Redwood Rd, Lake Chabot Rd from Fairmont to Quail Ave, A Street from Knox St to Hayward City Limit, Liberty Street from Fairmont Dr to 170th Ave, Vasco Rd from Dalton Ave to Landfill Entrance: Rehabilitate pavement including key cutting, milling, base repairs, asphalt concrete placement, pedestrian ramps, curb, gutter, signing and striping.	ALA130018	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Alameda	MTC	West Oakland Link	In Oakland: In the vicinity of the East Span of the San Francisco-Oakland Bay Bridge: The West Oakland Link bike/ped path will connect the communities of West Oakland, Oakland, and other East Bay cities to the new East Span of the San Francisco Oakland Bay Bridge. The trail will is part of the regional Bay Trail.	ALA130030	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	ACTC	I-80/Ashby Avenue Interchange Improvements	Alameda County: I-80/Ashby IC: Reconstruct the Interchange. The proposed interchange elements include construction of a new bridge to replace the existing bridge and reconstruction of the interchange, construction of a new stand-alone bike & pedestrian overcrossing structure over the I-80 and provide access to Bay Trail from 65th Street, relocate frontage road, construct signal, ramp metering, lighting and landscaping. The bike & pedestrian overcrossing may be advanced as Phase 1. Cost for bike Ped elements is estimated at roughly $40M, June 2021.	ALA170002	21-T09-061	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Alameda	Oakland	Oakland - 14th Street Safe Routes in the City	Oakland: On 14th St between Brush St and Oak St: Reduce travel lanes from four (4) to two (2) add Class IV protected bicycle lanes separated from travel by curbs and parked cars pave bike lane where necessary implement transit boarding island improve pedestrian facilities including pedestrian refuges, marked crossings, retimed signals and implement storm drain rain gardens.	ALA170043	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	ACE	ACE Fixed Guideway (Capitalized Maintenance)	ACE: Along ACE Corridor: Capitalized Maintenance payments required to operate along Host Railroad's corridor. Capitalized Maintenance payments will go to the Host Railroad for annual track and signal maintenance costs.	ALA170048	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Alameda	Alameda	Central Avenue Safety Improvements	Alameda: On Central Ave from Main St to Sherman St: Implement multimodal street improvements including reduction from 4 to 3 lanes, a center turn lane, bike lanes, a 2-way separated bikeway adjacent to 3 schools, roundabouts including at Central/Fourth/Ballena with OBAG3 funding, Central/Third/Taylor and Central/Main/Pacific, curb extensions, pedestrian refuge islands, rectangular rapid-flash beacons, new crosswalks and street trees/rain gardens. This Central Avenue project creates a comprehensive multimodal street between Main Street/Pacific Avenue and Encinal Avenue/Sherman Street, which is 1.7 miles in length and runs through the center of town. Central Avenue connects the Naval Air Station (NAS) Alameda PDA, a ferry terminal, a second proposed ferry terminal, various AC Transit bus lines, commercial and residential areas, the City's largest municipal park, Washington Park, and students biking and walking to/from several neighborhood/charter/magnet schools with an estimated enrollment of 5,000 students. Caltrans jurisdiction covers the east end totaling 0.75 miles as SR-61. The San Francisco Bay Trail covers the west totaling 0.75 miles. The project will achieve the following goals: -Allows for a safer street within a neighborhood heavily concentrated with schools, and includes a center turn lane, which the Federal Highway Administration deems has substantial safety benefits when reducing travel lanes from four to three -Constructs bike lanes or a cycle track compared to only 12 percent that is currently with a bike/pedestrian path -Makes it easier and safer for people to walk across Central Avenue with new traffic lights, curb extensions, pedestrian refuge islands, rectangular rapid fire beacons and new crosswalks at key intersections - Improves the streetscape with street trees, gateway features and rain gardens -Improves bicycle and pedestrian access along the San Francisco Bay Trail and -Provides accessible curb ramps and six accessible on-street parking spaces.	ALA170049	21-T07-056	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Alameda	Oakland	Fruitvale Alive Bike/Ped Gap Closure	In Oakland: On Fruitvale Ave between Alameda Ave and E. 12th: Install class 4 cycle tracks and landscaped buffers, widen sidewalks, improve pedestrian crossings, add pedestrian scale lighting, reconfiguring/removing auxiliary and slip lanes to increase safety no road diet.	ALA170051	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Alameda	MTC	I-880 Integrated Corridor Management - Central	Alameda County: I-880 Corridor from Davis Street in San Leandro to Whipple Road in Union City: Building on the ICM work being done in the northern segment of the I-880 corridor, the I-880 ICM Central Alameda Project will identify how existing and planned incident management strategies and operations can be better coordinated and integrated across networks and jurisdictional boundaries in the central segment of the I-880 Corridor. Phase I: Along San Leandro Blvd and Washington Ave from West Juana Ave and Lewelling Blvd: Implement an integrated corridor management system	ALA170057	21-T07-057	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Alameda	Caltrans	GL: Alameda and Marin Counties - TOS-Mobility	Alameda and Marin Counties: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and 40 CFR Part 93.127 Table 3 categories - Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Lighting improvements, Emergency truck pullovers, Interchange reconfiguration projects Includes ramp metering and TOS Elements on I-580, I-680 and I-880 in Alameda County and US-101 in Marin County	ALA170060	21-T06-048	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Oakland	Lakeside Family Streets	Oakland: On Harrison St between 20th Street and 27th Street, and along Grand Ave from west of Harrison to east of Bay Place: Install cycle track, parking protected bikeways and protected intersection. On Harrison between Grand and 27th St: implement parking protected bikeway and sidewalk extension. The project includes crosswalk enhancements, install/upgrade of ADA compliant curb ramps, and intersection improvements.	ALA170063	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Hayward	Hayward - Main Street Complete Street	Hayward: On Main Street between Mc Keever and D Street: reduce roadway from 4 to 3 lanes (Road Diet with center turn lane), add bulb-outs (curb extensions) at intersections, add Class II green bike lanes for visibility, improve ADA access with new curb ramps, new sidewalks, create on-street parking opportunities that provide door zone protection for bicyclists, and resurface roadway and restripe. AC Transit routes will continue to operate on Main Street and accommodations for the transit stops will be provided along the street.	ALA170065	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled

Alameda	Berkeley	Southside Complete Streets and Transit Improvement	Berkeley: Various locations south of UC Berkeley: Construct two-way cycle tracks, signal modifications, transit improvements, loading zone modifications, pedestrian safety improvements, and pavement rehabilitation. Project includes two-way cycle tracks on Dana St from Dwight Way to Bancroft Way, on Bancroft from Milvia St to Piedmont Ave, and on Fulton St from Dwight Way to Bancroft Way, and the associated signal modifications on Dana St, Bancroft Way, and Fulton St; transit improvements on Bancroft Way from College Ave to Shattuck Ave including a dedicated bus lane; commercial and passenger loading zone and disabled placard blue zone improvements throughout the project area; pedestrian safety improvements at various intersections including protected pedestrian crossing phases, high-visibility crosswalks, refuge islands, new and upgraded ADA curb ramps, and intersection modifications at Bancroft Way/Fulton St; and pavement rehabilitation on Dana St between Dwight Way and Bancroft Way, on segments of Bancroft Way between Piedmont Ave and Milvia St, and on Fulton St between Dwight Way and Bancroft Way.	ALA170067	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Alameda	Clement Avenue Complete Streets	Alameda: On Clement Avenue between Broadway and Grand St: Create a comprehensive multimodal street between Broadway and Grand Street, which is 1.2 miles in length and at a gateway location for the city in the Northern Waterfront PDA making it easier to connect to Fruitvale BART, Oakland and beyond. The project will maximize the efficiency of the Miller-Sweeney Bridge, which is one of only five ways on/off the island, and will transform this 48-50 foot street from industrial railroad blight to a best practices multimodal corridor.*Complete Street Project*1) Bikeway-Installs Class IV bikeway Provides bike boxes with green pavement Installs bike signals at the Park Street/Clement Avenue intersection,2) Walkway-Widens sidewalks at locations narrowed by utility poles and trees to provide a continuous accessible path of travel Upgrades curb ramps to ensure compliance with the Americans with Disabilities Act Installs high visibility marked crosswalks, rectangular rapid flashing beacons and curb extensions,3) Safety-Improves lighting at marked crosswalks along the corridor,4) Railroad Remnants-Removes the abandoned railroad tracks down the center of the street and the remaining railway signs. Resurfaces the pavement at the railroad track removal area,5) Parking-Installs accessible on-street parking spaces Requires parking restrictions at key intersections to increase visibility and to allow for improved turning radii for trucks Removes parking at pinch points to provide a continuous path of travel where the sidewalk width is less than 36 inches,6) Driveways-Improves driveways to reduce vehicle encroachment into the sidewalk,7) Truck Access-Provides adequate travel lane widths, turning radii and loading zones for deliveries, and8) Streetscape-Installs street trees, bike racks, gateway features and wayfinding signs.	ALA170073	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Alameda	Alameda Grand St Pavement Rehab and Safety Imps	Alameda: Grand Street, Shore Line Drive to Otis Drive (0.3 miles): Resurface project street; perform minor maintenance repair to curbs, gutters, culverts, and curb ramps; install Class IV bikeway; install Rectangular Rapid Flash Beacon (RRFB) and marked crosswalks; enhance transit stops. This project helps protect and maintain city street surfaces, improve safety and mobility for all users and improve storm water surface drainage.	ALA170074	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Alameda	Fremont	Centerville Complete Streets of Relinquished SR84	Fremont: Thornton Ave (San Pedro Drive/Dondero Way to Fremont Blvd), Fremont Blvd (Alder Ave to Mattos Dr) and Peralta Blvd (Fremont Blvd to Sequoia Rd): Convert the "Phase 1" portions of the relinquished SR 84 in Fremont into multimodal complete streets, with narrower lanes, curb extensions, reduced curb radii, ADA curb ramp upgrades, buffered bike lanes and improved sidewalks, intersections and ped crossing facilities, pavement rehabilitation, landscape / streetscape improvements, the addition of on-street parking between Thornton Avenue and Bonde Way, and left turn pockets. On Peralta Blvd (Fremont Blvd to approx. 0.1 miles east): Reduce lanes from two in each direction to one.	ALA170076	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	ACE	ACE: Railcar Midlife Overhaul	ACE: System-wide: Perform midlife overhaul of existing ACE railcars to extend useful life. The railcars being rehabilitated are approaching 20 years of service. Overhauling these railcars will increase the life of each car by over 25 years.	ALA170079	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
Alameda	ACTC	7th Street Grade Separation East	Oakland: 7th St and rail tracks between I-880 and Maritime St in the Port of Oakland: Reconstruct the existing 7th St substandard underpass on an adjacent alignment, rail tracks, and other rail infrastructure at the Union Pacific Railroad (UPRR) tracks that maximizes the operation of the Port's overall roadway system to provide traffic management benefits. No through lanes will be added. The existing multi-use path along 7th Street (part of the Bay Area trail) will be improved and brought up to standard. Due to the delay in PFIP funding availability, Alameda CTC is planning on requesting LONP to align it with other funds programmed in FY 22/23, pending Caltrans's guidance.	ALA170085	21-T07-055	Exempt (40 CFR 93.127) - Changes in vertical and horizontal alignment	Not Modeled

Alameda	Albany	San Pablo Ave and Buchanan St Pedestrian Imps.	Albany: San Pablo/Portland intersection: Install Rapid Flashing Pedestrian Beacons. Taylor St./Buchanan Street intersection: Install a Pedestrian Hybrid signal. Marin Avenue and Buchanan Street merge: Realign merging roadways and the create a pocket park within the new realignment. The project will be delivered in three phases: Phase I scope includes Brighton to Portland and will be delivered in FY 2023-24. Detailed Phase I Project (CIP No. 24001) elements include: Pedestrian refuge areas at Garfield Avenue, and Portland Avenue. High visibility crosswalks at Brighton Avenue, Garfield Avenue, Castro Street and Portland Avenue. Pedestrian signals at Brighton Avenue. New ADA compliant curb ramps at Brighton Avenue, Garfield Avenue, Castro Street, and Portland Avenue. New rapid flashing pedestrian beacon at Castro and Portland Avenue. Pedestrian safety improvements at Clay Street, including high visibility crosswalks and pedestrian refuge island, has been incorporated into the Alameda CTC's San Pablo Safety and Bus Bulb Improvements (ALA230009). Phase II of the San Pablo Pedestrian Improvements Project is at Washington Ave and will include full signal installation and curb ramp improvements for the Washington Avenue intersection. This work has also been incorporated into Alameda CTC's aforementioned project/TIP. Phase 3 is for Buchanan Ave and would include improved signage and high visibility crosswalks at the Solano Avenue/Buchanan Avenue intersection, the Pierce Buchanan intersection, and the Taylor/Buchanan intersection, and realignment of the Buchanan/Marin intersection to improve traffic flow.	ALA170088	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Alameda County	Alameda County Complete Street Improvements	Alameda County: Various locations: Bicycle and ped safety improvements including a bridge replacement to accommodate sidewalk installation along Meekland Avenue from West Blossom Way to East Lewelling Blvd in the Cherryland Community with ADA curb ramp upgrades, rain gardens and landscape trees, new drainage inlets, and utility relocation. Add new location East Lewelling Blvd from Meekland Ave to E.14th street with Class II Buffered bike lanes, Class IV Bikeway, and sidewalk. Add new location Anita Avenue from Somerset Ave to Castro Valley Blvd with new sidewalk, RRFB, Bulb-Outs, Enhanced crosswalks	ALA190019	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Pleasanton	I-680/Sunol Interchange Improvements	Pleasanton: At the I-680/Sunol Blvd Interchange. Add 3 new traffic signals at the on/off ramps and at Castlewood Dr.; add 2 new on-ramp lanes (1 multipurpose and 1 HOV); add new protected bike facilities; add a paved pathway for pedestrians and bicyclists; add a new protected intersection at Arlington Rd/ Sunol Blvd.; and widen the bridge on I-680 over Sunol Blvd. to accommodate lane acceleration, sound walls, and lane striping. Widening is limited to the ramp and no additional lanes will be added to the mainline of either roadway.	ALA190020	21-T06-021	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Alameda	Alameda County	Niles Canyon Trail, Phase I	Alameda County: In the vicinity of SR-84 between Niles District and Palomares Road (Phase I): Construct multi-Use trail. The multi-use trail will serve walkers and bikers users who seek to both recreate and commute through Niles Canyon between the Niles District and the Town of Sunol. The Niles trail project includes three phases between the following geographic limits: Phase I - The District of Niles near Vallejo Mill to Palomares Road Phase II - Palomares Road to Brightside railroad yard Phase III - Brightside railroad yard to the railroad station within the Town of Sunol. Phases II and III will be added to future TIP listings if needed. Total cost of all three phases is approximately $105M (2019 $)	ALA190021	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Alameda County	E14th St/Mission Blvd Corridor Improvements	Alameda County: Along E14th St/Mission Blvd between I-238 and Hayward City limits: Construct streetscape improvements for continuity along corridor. Project includes new sidewalks, intersection bulb-outs, Class IV bikeways, landscaping, bus boarding islands, pavement resurfacing. No general purpose automobile travel lanes will be added or removed.	ALA190022	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Union C Transit	Union City Transit: COVID-19 Emergency Transit Ops	Union City Transit: Systemwide: Capital, planning and operating assistance related to the coronavirus public health emergency including administrative leave removal of health and safety hazards, such as additional vehicle and facilities cleanings costs associated with shutting down and/or restarting service materials like hand sanitizer, gloves, soap, and cleaners emergency protective gear relevant to the emergency temporary service, that is not part of regular service, provided in response to the emergency and essential delivery services.	ALA190027	21-T01-001	Exempt (40 CFR 93.126) - Safety - Emergency relief (23 USC 125)	Not Modeled
Alameda	Union C Transit	Union City Transit Electric Bus Procurement	Union City Transit: Fleet: Replace existing buses with zero-emission battery-electric buses. Union City Transit (UCT) has fourteen (14) compressed natural gas (CNG) heavy-duty transit buses that have exceeded and/or are nearing end of useful life and are eligible for replacement beginning in 2020, 2022, and 2024. The vehicles are requiring expensive repairs to components that are at the end of useful life. Instead of constantly investing in new components, UCT is seeking funding to migrate its fleet towards zero-emission vehicles. The fourteen (14) UCT vehicle stalls will require modification in order to accommodate vehicle charging, this will be an expansion within the existing facilities without increasing the parking footprint. This project will familiarize Union City Transit with electric vehicles in advance of future procurements to replace its remaining four (4) CNG heavy-duty transit buses by 2028 and to ultimately convert the entire fixed-route and demand-response fleets by 2030.	ALA190029	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	Oakland	Oakland 7th Street Connection Improvements	Oakland: 7th St between Mandela Parkway and Martin Luther King Jr. Way: Implement complete streets improvements that reduce vehicle travel lanes and installs protected bicycle lanes, traffic signal upgrades curb ramps, accessibility enhancements, transit boarding islands, pedestrian refuge islands, sidewalk repairs, and new carbon-capturing street trees. Closes a critical gap for people walking, biking, and connecting to transit between West Oakland and Downtown. The project will also install a road diet between Mandela and Adeline(currently 4 lanes 2 in each direction, after project 2 lanes, 1 each way) and between Adeline and MLK Jr. (currently 6 lanes, 3 in each direction with turn lanes under I-980, after project 4 lanes, 2 in each direction). This project is being coordinated with the HSIP 9 project (H9-04-022) at the 7th/Filbert intersection.	ALA210001	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled

Alameda	Oakland	East Oakland Neighborhood Bike Routes	Oakland: Various Streets and Roads in East Oakland: Construction bicycle improvements including construction of four Class III bicycle boulevards in East Oakland Neighborhood bike routes on 81st Avenue, 85th Avenue, 64th Avenue/Arthur Street, and Hamilton Street/Rudsdale Street/D Street/Royal Ann Street in East Oakland. Project implements roadway and intersection improvements including new curb ramps, high visibility crosswalks, neighborhood traffic circles, speed humps, pavement markings, wayfinding signage, roadway repaving, and signal timing modifications. Neighborhood bike routes on four corridors in East Oakland to make crossing arterials safer and more comfortable, linking residents to schools, parks, transit, grocery stores and other community destinations.	ALA210002	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	ACE	ACE Capital Access Fee	ACE: Along ACE Corridor: Capital Lease payments required to operate along Host Railroad's corridor.	ALA210008	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Alameda	ACE	ACE Revenue Vehicle Communication Equipment	ACE: Fleetwide: Replace and upgrade ACE on-board communication equipment , including geolocation systems, radios, computers, and passenger information and communication equipment.	ALA210009	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Alameda	AC Transit	AC Transit: Purchase 9 60ft Articulated Fuel Cell	AC Transit: Articulated Bus Fleet: Replace (9) Van Hool Articulated Diesel Buses that are at the end of its useful life with (9) Articulated Fuel Cell Buses.	ALA210011	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	AC Transit	AC Transit: Purchase 50 40-ft Diesel Buses	AC Transit: Diesel bus fleet: Replace 41 30ft 2006 Buses and 20 40ft 2008 Buses with 50 40ft Diesel Buses	ALA210012	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	Fremont	Fremont Blvd/Walnut Ave Protected Intersection	Fremont: At the intersection of Fremont Boulevard and Walnut Avenue: Construct a new protected intersection including removal of existing right turn slip lanes, elevated/extended curb returns, high visibility crosswalks, intersection lane reconfiguration, and traffic signal replacement. The project will also install new video-based traffic and bicycle detection at the various approaches. The project will connect to existing elevated/separated Class IV bikeways and sidewalks along Walnut Avenue and Fremont Boulevard, connecting nearby high-density residential complexes to nearby commercial centers, job centers, recreational destinations, social services, and high-quality transit (Fremont BART station).	ALA210014	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Fremont	Fremont Blvd-Grimmer Blvd Protected Intersection	Fremont: At the Fremont/Grimmer and Fremont/Eugene intersections: Construct protected intersections, as well as elevated bikeway between the two intersections along Fremont Boulevard including removal of existing right turn slip lanes, elevated/extended curb returns, high visibility crosswalks, intersection lane reconfiguration, and traffic signal replacement. The project will also install new video-based traffic and bicycle detection at the various approaches. The project will connect to a proposed Class I multipurpose trail (currently under design) along Grimmer Boulevard, connecting nearby high-density residential complexes to nearby commercial centers, job centers, recreational destinations, and high-quality transit (future Irvington BART station).	ALA210015	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	AC Transit	Tempo Quick Build Transit Lane Delineation	Oakland: On International Blvd between 14th Ave and Durant Ave: Enhance the existing median bus lane for AC Transit BRT by adding safety features such as signage and delineators to increase motor and pedestrian safety.	ALA210017	21-T10-073	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Fremont	Sabercat Trail: Irvington BART to Ohlone College	Fremont: Starting at Blacow Rd, crossing Osgood Rd, across I-680 to Sabercat Historical Park: Create a safe and convenient Class 1 multi-use bicycle and pedestrian path. Bike/Ped Trail at Blacow Road with an overhead structure at BART and UPRR tracks, crossing Osgood Road with a protected intersection. The trail will cross Caltrans property and I-680 with a bicycle/pedestrian overcrossing (BPOC) and tie into the existing trail in Sabercat Historical Park forging a critical link in Fremont's city-wide cycling and pedestrian network, enhancing connectivity through and to the Irvington District. The "other state" funding includes AB 74 State Funds received through the Natural Resources Agency, AB 179 State Funds received through the Department of Parks and Recreation, and AB 179 State Funds received through the Department of Transportation. Phase 1 of the project will improve the existing trail in Sabercat Historical Park. Phase 2 is the trail extension over I-680 and to Osgood Road.	ALA210019	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Fremont	I880 Innovation Bridge and Trail (EBGW Reach 6)	Fremont: Along Fremont Blvd and Kato Rd, along Agua Caliente Creek and over I-880: Construct Class 1 multi-use trail and overcrossing. The Interstate (I)-880 Innovation Bridge and Trail Project is located within the Innovation District in the City of Fremont. The Project represents the southernmost segment of the East Bay Greenway (EBGW) regional trail. The Project consists of the following components: 1. An approximately 3,300-foot Class I multi-use trail along Fremont Boulevard and the west side of Kato Road 2. An approximately 310-foot bridge approach ramp along the west side of Kato Road 3. An approximately 850-foot bicycle and pedestrian bridge crossing over I-880 (Post Mile 2.6/2.9) from Kato Road on the east, to Landing Parkway on the west 4. An approximately 315-foot approach ramp and an approximately 540-foot Class I multi-use trail adjacent to the northern boundary of the Agua Caliente Creek (Alameda County Flood Control Channel - Line F) maintenance road connecting to Fremont Boulevard and 5. A mid-block traffic signal at Fremont Boulevard connecting the Project to the San Francisco Bay Trail (SF Bay Trail). PBA 2050 ID is 21-T08-060	ALA210020	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	ACTC	Rail Safety Enhancement Program: Phase A (RSEP-A)	Alameda County: Various at-grade rail crossings: Implement safety improvements. The improvements include full pedestrian treatments (automatic gates, swing gates, channelizing railing and sidewalks), replace crossing panels and median islands, fencing, lighting, signage and striping lighting. The improvements and locations were developed from a crossing analysis approved by ACTC to advance safety and reduce impacts throughout Alameda County. RSEP-A will implement the near-term upgrades at 28 crossings and 2 trespass areas.	ALA210022	21-T07-055	Exempt (40 CFR 93.126) - Safety - Railroad/highway crossing	Not Modeled
Alameda	Oakland	73rd Ave Active Connections to Transit	Oakland: On 73rd Ave between MacArthur and Coliseum BART (Hawley Street): Implement bus boarding bulbs, bus stop improvements, buffered bike lanes, crossing improvements, signal improvements On Hegenberger between International and Hawley Street: extend sidewalks	ALA210025	21-T09-061	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	MTC	Bay Bridge Forward I-80/ Powell I/C Transit Access	Emeryville: At the I-80/Powell Street interchange: Proposed transit access improvements to this interchange include providing bus queue jump lanes, exclusive bus-only turn lanes, transit signal priorities, new and/or improved bus stops at the interchange vicinity. PBA2050 ID is 21-T06-049.	ALA210027	21-T06-049	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled

Alameda	Emeryville	40th Street Transit and Multi-Modal Enhancements	Emeryville: Part 1 Project Limits - On 40th Street between IKEA Entrance signal and Adeline Street: Implement multi-modal improvements. Part 2 Project Limits - On Shellmound Street between IKEA Entrance signal and Christie Avenue: Implement multi-modal improvements. The multi-modal concept design for 40th Street and Shellmound Street in Emeryville includes the following design features for the length of the corridor: 1. A 10-12 ft wide, two-way separated (Class IV) bikeway is integrated into the design of the street on the north-side of 40th Street and west-side of Shellmound Street. The bikeway is typically at roadway grade, separated from the adjacent bus-only lane by a 4-ft wide raised side median. The bikeway is raised to sidewalk level through the bus hub areas. 2. Transit-only Lanes. Near intersections, buses will share the dedicated lane with right-turning vehicles. 3. Multimodal Intersection Improvements. Increase pedestrian and bicycle safety/comfort using the following: enhanced crosswalks striping of advance stop bars curb extensions on cross-streets phasing bike signal heads a protected intersection approach for cyclists (where feasible) bike boxes and green-backed sharrows and striping of dashed green pavement markings where two-way separated bikeway crosses through intersections and driveways. 4. Transit Stop Locations and improvements. Project will reduce underutilized transit stops to further improve the overall travel time for buses. All other bus stops are proposed to remain at their current near or far-side locations. Typical improvements on the north-side are 9 ft wide, 120 ft long transit passenger (bus boarding) areas. Typical improvements on the south-side of 40th Street and west-side of Shellmound Street are 13 ft shared sidewalk/ passenger (bus boarding) areas. The transit passenger areas are directly accessible from the sidewalk and fitted with amenities such as a shelter, benches, trash receptacle, and lighting. 5. 40th Street Bus Hub Area between San Pablo Avenue and Adeline Street: Includes continuation of the two-way separated bikeway on the northside of the street to Adeline Street, dedicated bus-only lanes, and dedicated bus boarding areas with enhanced transit passenger environment. Both Part 1 and 2 will be implemented as part of the same construction contract.	ALA210029	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	MTC	Regional Planning Activities and PPM - Alameda	Alameda: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on ALA170007	ALA210031	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Alameda	Pleasanton	West Las Positas Blvd Multimodal Reconstruction	Pleasanton: On West Las Positas Blvd. between Hopyard Road and the Iron Horse Trail. This project will reconstruct a 1.4 mile segment of a larger planned 3.8 mile reconstruction of West Las Positas Blvd. to provide high-quality multimodal facilities along the corridor by replacing the degrading roadway and reconfiguring it from a 6-lane section to a 4-lane section with expanded pedestrian pathways and elevated cycle tracks, landscaped buffers, intersection safety improvements, new parking accommodation, and a new stabilizing roadway subbase.	ALA210032	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Union C Transit	Union City Transit EV Charging Infrastructure	Union City ZEB Infrastructure Set-Aside. Electric Vehicle Charging Infrastructure. Union City Transit requires charging infrastructure for the sixteen (16) electric vehicles that have begun deliveries through the end of 2024. These funds will assist in acquisition and installation of the necessary equipment to support an increasingly electrified fleet of vehicles for the purpose of providing public transit.	ALA210201	(blank)	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	BART	DT Berkeley BART Station Elevator Modernization	Berkeley: At the Downtown Berkeley BART Station: Modernize two (2) station elevators to replace/upgrade critical components of the elevator to utilize the latest technology increase performance and reliability improve safety to the latest applicable standards and update aesthetics.	ALA230001	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	Fremont	I-880/Decoto Road Interchange Modernization	Fremont: At the I-880/Decoto Road interchange: Reconstruct the existing interchange to include a new Class I trail and a dedicated bus lane in both directions of travel through the interchange. The proposed interchange modernization project will provide transit priority lanes and improve bicycle and pedestrian access through the interchange, while maintaining traffic operations within the I-880/Decoto Road interchange. The transit only lanes will be on the inside lanes in both eastbound and westbound directions, and it will extend between the project's eastern limit at the Decoto Road/Cabrillo Court intersection and the project's western limit at the southbound I-880 off-ramp. The proposed multi-purpose path will extend along the north side of Decoto Road through the interchange within the same limit.	ALA230002	21-T07-056	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Alameda	Fremont	I-680/Mission Boulevard Interchange Modernization	Fremont: I-680/Mission Blvd: Redesign the interchange to reduce the steep grade of the southbound off-ramp onto Mission Boulevard and incorporate a separated bicycle and pedestrian path along Mission Boulevard through the interchange. The current southbound off ramp has a grade in excess of 8%.	ALA230003	21-T08-060	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Alameda	BART	Hayward Fleet Maintenance Facilities	BART: At the Hayward Maintenance Complex: Expand the Hayward Maintenance Complex to accommodate rail vehicles and the tire fleet for maintenance and repair. General site improvements will satisfy the current drainage standards, security and system integration requirements, and safety. Located in southern Alameda County, the HMC is one of four revenue vehicle maintenance complexes in the BART system. This expansion is intended to support the new fleet preventative maintenance and BART extension to San Jose. The cost estimate is in 2022 dollars.	ALA230005	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	Oakland	Reconnecting the Town (RAISE)	Oakland: On Broadway between 2nd Street and 11th Street and 20th Street and West Grand Avenue; Martin Luther King Jr. Way between 2nd Street and 14th Street; and 7th Street between Brush Street and Mandela Parkway: Implement transit only lanes (Broadway), upgrade existing bikeway (MLK Jr. Way), road diet, new traffic signals, lighting, and bulbouts, and other infrastructure safety improvements and ADA upgrades for people walking and biking. All corridors will install fiber-optic cable to extend the existing ITS network.	ALA230006	21-T10-073	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled

Alameda	ACTC	East Bay Greenway MM Phase 1 Lake Merritt-Bayfair	Alameda County: Along the BART alignment following parallel arterial roadways from Lake Merritt BART Station to Bayfair BART Station: Construct a regional trail facility comprised of Class I and Class IV bikeway facilities that would span approximately 10.6 miles, traversing East Oakland, and San Leandro. The project will run along city streets including E. 10th St., E. 8th St., E. 12th St., San Leandro Streets, San Leandro Blvd., and E 14th St. Along E 14th St., the project also includes pedestrian safety improvements, bus stop improvements, and placemaking elements. Road diet segments are included and intersections will be modified at various locations for enhanced bicycle and pedestrian safety.	ALA230007	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	ACTC	San Pablo Avenue Bus/Bike Lanes	Oakland, Emeryville, and Berkeley: Along San Pablo Avenue from 16th Street in Downtown Oakland to Heinz Street: Install pedestrian crossing improvements and dedicated bus lanes and bike lanes	ALA230008	21-T10-077	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Alameda	ACTC	San Pablo Ave Safety Enhancements Improvements	Berkeley and Albany: San Pablo Avenue in Berkeley and Albany from Heinz St to the Contra Costa County line: Install bus bulbs and pedestrian/bicycle crossing improvements	ALA230009	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	ACTC	San Pablo Ave Parallel Bike Improvements	Berkeley and Albany: Various locations along bicycle boulevard/neighborhood bikeway routes parallel to San Pablo Avenue: Install bicycle improvements including crossing safety, speed/volume control measures, wayfinding, and other elements.	ALA230010	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	AC Transit	AC Transit: D6 Construct Hydrogen Fueling Infrastr	AC Transit: AC Transit Division 6: Construct hydrogen fueling infrastructure for fuel cell electric buses. ZEB Infrastructure Set-Aside Program.	ALA230201	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Alameda	LAVTA	LAVTA and CCCTA Hydrogen Fueling Stations	LAVTA and CCCTA: Facilities in Livermore and Concord: Design and construct two hydrogen fueling stations and maintenance infrastructure at existing County Connection and LAVTA maintenance facilities to accommodate the fueling of hydrogen fuel-cell electric heavy-duty transit buses in support of the I-680 Express Bus Program. The County Connection fueling station at its existing maintenance facility at 2477 Arnold Industrial Way in Concord will support up to 50 vehicles. The LAVTA fueling station at its existing maintenance facility at 875 Atlantis Court in Livermore will accommodate up to 120 FCEBs to facilitate the agency's complete conversion to procuring all FCEBs by 2029. The LAVTA facility will also accommodate future fleet growth and ensure scalability of clean-fuels transition and help catalyze broader FCEB manufacturing and uptake in California. Other Federal funds are Carbon Reduction Program funds.	ALA230202	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Alameda	Newark	Old Town Streetscape and Complete Streets	The Project will improve access, safety, and connections for pedestrians, bicyclists, and transit users, while also serving as a catalyst for private investment in buildings and uses within the Old Town PDA. The Project reduces the number of travel lanes on Thornton Avenue, freeing up space for wider sidewalks and bicycle lanes, where there are currently none. Additional safety and connectivity improvements include new high visibility crosswalks, curb extensions, bus stop amenities, and landscaping to improve the convenience and comfort of alternative travel modes. The Project is a key part of the City of Newark's Old Town Specific Plan's coordinated land use, economic development, and transportation strategy to inspire reinvestment and revitalization.	ALA230203	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Alameda County	Upper San Lorenzo Creekway Trail	The Upper San Lorenzo Creekway project will install a new 8.1 mile bicycle and pedestrian trail in central Alameda County. The project includes direct connections to Bay Fair, Hayward, and Castro Valley BART stations and Don Castro Regional Recreation Area.	ALA230205	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	AC Transit	Fruitvale Corridor Transit Signal Priority (TSP) P	The Fruitvale Corridor Project will improve transit operations on its most productive bus routes – Lines 20 and 21. The project will consist of installing TSP signal improvements and associated equipment. Fruitvale Avenue is a major transit corridor, carrying 3,100 riders per day with service ranging from every 15 minutes to every 5 minutes across 4 AC Transit lines – 14, 39, 20, and 21. Furthermore, Fruitvale BART is a major hub for 15 AC Transit lines, connecting Alameda and Fruitvale to the greater Oakland and Bay Area region. To further build upon the foundation of this corridor, AC Transit seeks to install 25 TSP signal improvements and associated controllers, radios, phase selectors, cable and other associated equipment at every signalized intersection along Fruitvale Avenue between MacArthur Blvd and E 9th as well as San Leandro St leading into Fruitvale BART, and E 12th St into 29th Ave. These signals would be operational to match AC Transit's 7 days a week service with a priority for improving transit speeds during peak hours where passenger loads and delay are the highest. Project will also include system testing and planning efforts.	ALA230206	21-T10-073	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Alameda	Berkeley	Addison Street Bicycle Boulevard Extension	In Berkeley on Addison Street from Bolivar Drive to the east side of Sacramento Street and on Addison Street from Milvia Street to Oxford Street, install Class I, III, and IV bicycle facilities, two traffic circles, a traffic diverter, RRFB and refuge median, PHB, signage, pavement rehab, and striping. The Addison Street Bicycle Boulevard project will provide a safe, low-stress east-west bicycle connection in Berkeley, filling a 1.5-mile gap in the city's existing bicycle boulevard network. The project will serve a central role in the City's bicycle network, meets public demand for safe, low stress bicycle routes, and is in an area of high demand for bicycling in Berkeley. In addition to filling a gap in Berkeley's Bicycle Boulevard network and improving destination connectivity, anticipated project outcomes include higher rates of bicycling and walking, lower rates of GHG emissions and vehicle miles traveled (VMT), improved safety outcomes on the corridor, and reduced transportation costs for Berkeley residents, particularly those living in disadvantaged communities along and adjacent to the Addison Street corridor.	ALA230207	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Alameda	Berkeley	Washington Elementary and Berkeley High SR2S	Crossing improvements at thirteen intersections in Downtown Berkeley around Washington Elementary and Berkeley High Schools, and school frontages on Milvia Street and McKinley Avenue. The project will improve bike and pedestrian safety outcomes for Berkeley public school students walking and bicycling to school in direct response to safety concerns that have been documented by the community.	ALA230208	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Alameda	AC Transit	AC Transit: Training and Education Center (TEC) Mo	These funds are for the retrofit of the current Training and Education Center to enable it to become both a bus maintenance and a classroom/laboratory facility. Also there funds workforce development activities.	ALA230209	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	AC Transit	AC Transit: Purchase 42 40ft Urban Fuel Cell Buses	AC Transit: 42 Fuel Cell Buses: Purchase buses to meet State mandate of ZEBs in AC Transit's fleet.	ALA230210	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	AC Transit	MacDonald Avenue Transit Signal Priority - Phase 1	MacDonald Avenue Transit Signal Priority Project Phase 1 - This project will install Transit Signal Priority (TSP) equipment along MacDonald Avenue in Richmond. The project will also include traffic signal upgrades, signal communication, and signal timing coordination. In addition, bus stops along the corridor will be improved through relocation, consolidation, installation of bus bulbs/islands.	ALA230211	21-T10-073	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Alameda	AC Transit	Foothill Corridor Planning Study	This planning study is to provide service and design alternative to reduce congestion delay and improve bus operations. The potential improvements include bus lanes, queue jumps, and sidewalk bulb outs, new traffic signals or other traffic controls.	ALA230212	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Alameda	AC Transit	AC Transit: Purchase 23 40ft Urban Buses - Diesel	Purchase replacement diesel buses	ALA230213	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	LAVTA	LAVTA Bus Bay Rehabilitation	Rehabilitation of one bus bay in the Rutan maintenance shop to convert it so it can be used to maintain zero-emission hydrogen fuel-cell electric buses.	ALA230214	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	BART	Dublin/Pleasanton Access Improvements	Project will fully separate pedestrian, cyclist, and vehicle access infrastructure at Dublin/Pleasanton BART mobility hub (D/P Hub) by constructing 0.35-mile Class 1 two-way cycle-track and adding 0.15-mile ADA-compliant sidewalk, raised crosswalk, 21,500 sqft landscaping/stormwater management; installing 29 pedestrian-scale lights, new seating, wayfinding and art; replacing/upgrading 129 underpass lights; and adding 66 secure bike parking spaces and ebike charging. The project will vastly improve pedestrian and bicycle access to the D/P Hub, connect to existing segments of the Iron Horse Trail, and improve the active access connection between Dublin and Pleasanton across I-580.	ALA230215	21-T03-009	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Oakland	Bancroft Avenue Greenway	The Bancroft Avenue Greenway project will provide a two-mile, low-stress, separated multi-use path that enhances alternate, affordable and safer mobility to East Oaklanders of most ages to essential places such as schools, parks, food markets and critical services at the Eastmont Town Center. Most importantly, this proposed Class I Path will become a destination in of itself, a car-free corridor conceived by and to belong to existing disadvantaged communities (DAC), addressing deficiencies in the active transportation network, serving as the much-needed neighborhood connector to transit hubs, and meeting an important community need for aesthetically-pleasing, natured-filling open spaces for community building, affordable recreation and physical activity. Construct two miles of separated multi-use path, 112 ADA ramps, 60 wayfinding signs, 30 regulatory signs, 22 benches, 24 trash receptacles, pedestrian scale lighting throughout the corridor, 179 new trees, landscaping, and irrigation.	ALA230216	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	AC Transit	AC Transit: Purchase 24 40ft Urban Diesel Buses	Purchase replacement buses to keep the District’s fleet in state of good repair.	ALA230217	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	AC Transit	Purchase 23 60ft Artic Fuel Cell Buses	Purchase buses to meet State mandate of ZEBs in AC Transit's fleet.	ALA230218	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	AC Transit	AC Transit: Rehabilitate Maintenance Bays for ZEBs	Rehabilitate, retrofit and upgrade maintenance bays for safety and proper ventilation to work on ZEBs.	ALA230219	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	Fremont	Fremont Boulevard/Walnut Avenue Bikeway Project	The project will construct elevated bikeways and protected intersections along Fremont Boulevard from Country Drive to Mission View Drive and along Walnut Avenue from Paseo Padre Parkway to Fremont Boulevard. The project will provide bike/ped connections within and between the City's Downtown/City Center PDA, the Irvington Transit PDA, and other destinations. The project will be implemented in two phases: Phase 1 on Walnut Ave and Phase 2 on Fremont Blvd.	ALA230220	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Fremont	East Bay Greenway (Irvington to Fremont BART)	The project proposes to construct a segment of the East Bay Greenway Regional Trail, extending from Irvington District to Fremont Central Park, as well as a new Class I trail connection between the East Bay Greenway Trail to the Fremont BART station. Complete street improvements along the project corridors, including elevated bikeways, protected intersections, traffic signal upgrade, ADA curb ramps, sidewalk repair/replacement, storm drain modification, pavement rehabilitation, and landscaping.	ALA230221	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Livermore	I-580/Vasco Road Interchange Replacement	Livermore: The project will remove the existing overcrossing and replace it with a wider and taller bridge and reconstruct the on and off ramps and will include new traffic signals and safety elements. The proposed bridge will include 9 travel lanes and Class VI bicycle and pedestrian facilities. The project will enhance operations and safety for all modes of travel along Vasco Road, provide connectivity for bicyclist and pedestrian through the interchange corridor, and accommodate the future Valley Link. This Project is not anticipated to induce traffic nor VMT; the bridge widening and additional lanes to be added are primarily within the interchange limits, focusing on solving the interchange’s operational and safety concerns with existing uncontrolled loop ramp configurations and adding complete street improvements. The Project is not adding arterial capacity to Vasco Road that deviates from the City’s General Plan, and we are consistent with the existing approach on Vasco Road.	ALA230222	21-T06-019	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled

Alameda	Oakland	OakPARK+	Implement various parking and transportation demand management programs in Oakland including: expanding demand-responsive parking pricing to all metered areas, piloting the installation of parking sensors in high-value metered spaces to efficiently collect occupancy data, implementing all-week retail-friendly metered parking, adding 500 new metered parking spaces, and creating a permanent Universal Basic Mobility Program.	ALA230223	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Alameda	Alameda County	Lower San Lorenzo Creekway Trail	The Lower San Lorenzo Creekway Trail project will install approximately. 2.5 miles of primarily Class 1 bicycle and pedestrian trail facility in central Alameda County. The project includes direct connections to the San Francisco Bay Trail.	ALA230224	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Alameda	Parking Pricing And Curb Management Strategies	Alameda's Demand-Based Parking Pricing and Curb Management in Business Districts and Ferry Terminals Project is a package of strategies that includes: 1) implement demand-responsive parking pricing in paid parking spaces; 2) create more space for short-term parking, loading, and ADA parking; 3) guide people straight to underutilized off-street parking; and 4) introduce and improve paid parking at ferry terminals.	ALA230225	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Alameda	LAVTA	LAVTA Atlantis Facility	Design-engineering, project-management, and related technical support for construction of LAVTA's Atlantis Facility, including hydrogen fueling infrastructure and Fuel Cell Electric Bus (FCEB) maintenance needs.	ALA230226	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	Dublin	Village Parkway Complete Streets Improvements	The project is located in City of Dublin on Village Parkway from Amador Valley Boulevard to Kimball Avenue/north city limit. Construct streetscape elements, transforming the segment to a pedestrian and bike-friendly roadway incorporating complete street elements, median islands, bulbouts, high visibility crosswalks, bicycle facilities, and ADA upgrades.	ALA230227	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	LAVTA	AVLs for Replacement Vehicles	Purchase 12 Automatic Vehicle Locator (AVL) Systems for replacement buses.	ALA230228	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Alameda	LAVTA	LAVTA: Purchase Fareboxes	Purchase Fareboxes for 12 replacement vehicles	ALA230229	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Alameda	LAVTA	Replace (8) 40' Buses-Hybrid	Purchase 8 40' Hybrid replacement vehicles	ALA230230	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	LAVTA	Replace (4) 40' Buses-Fuel Cell	Replace four 40' Hybrid buses with 4 40' Fuel Cell Buses	ALA230231	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Alameda	LAVTA	LAVTA: Radios	Purchase Radios for 12 replacement buses	ALA230232	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Alameda	ACTC	Jackson Street Parallel Bike Improvements	The project consists of multi-use pathway improvements along the east side of Jackson Street within the University of California Village, between Buchanan St and 8th Street, parallel to San Pablo Avenue. This project is being delivered separately from the remainder of San Pablo Parallel Bike Improvements (ALA230010) due to utility and adjacent development conditions.	ALA230233	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	BART	BART Police Department Headquarters Project	Relocation of BART administrative headquarters with the Zone 1 patrol to an existing office building with tenant improvements. The five-story building and adjacent parking lot, formerly used for commercial office space, occupy 1.36 acres on two parcels. The building consists of 86,875 square feet of office space and a subterranean parking garage consisting of approximately 75 parking spaces. Building access is from Broadway, and the site is directly adjacent to 19th Street BART Station entrance at Broadway and 20th Street. The project includes tenant improvements for all five-stories to include features unique to police such as holding cells, armory, evidence room, etc. Improvements to the plumbing, electrical, HVAC, and fire protection systems may be needed as part of the tenant improvement. The project may also include structurally retrofitting the existing building, upgrading the existing perimeter fencing, security gate, and improving the existing parking lot. One floor, or portion thereof, of the building may be utilized by BART staff other than BART Police. The new BART Police Headquarters will be designed and built under a progressive design-build method, with an anticipated completion date of August 2026.	ALA230234	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Alameda	Alameda County	ACPWA Safety Action Plan	Develop a Safety Action Plan that focuses specifically on improving safety within the realm of transportation in the communities of unincorporated Alameda County. This Plan will evaluate and address various aspects of transportation safety, including road safety, pedestrian and bicycle safety, and public transit safety.	ALA250201	21-T07-058	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Livermore	East Avenue Corridor ATP Implementation 202222	The project will implement roadway safety improvements along East Avenue and include bike lanes, sidewalk, crossing enhancements, lighting. signing and striping.	ALA250202	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	San Leandro	MacArthur Blvd/Superior Ave Roundabout	The project will install a roundabout at the intersection of MacArthur Blvd and Superior Ave. The scope of work consists clearing and grubbing, excavation, removal of asphalt and concrete, and installation a roundabout, new concrete sidewalk, curb ramp, curb & gutter, signage and striping trench drain, and planting of landscaping, shrubbery and trees	ALA250203	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Alameda	San Leandro	Dutton Ave Roadway Reconstruction	The project will reconstruct the roadway of Dutton Ave from E 14th St to MacArthur Blvd. The scope of the project include pedestrian improvements such as new sidewalks, ADA curb ramps, high visibility crosswalks.	ALA250204	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Hayward	High Injury Network Supplemental Planning	Develop a Speed Management Plan and a High Injury Network Safety Plan that will supplement the City's Local Road Safety Plan. The Speed Management Plan will evaluate existing speeds and develop strategies for speed management. The High Injury Network Safety Plan will develop and identify projects along these areas/corridors: Downtown Area, A Street, B Street, Hesperian Boulevard, Jackson Street, Mission Boulevard, and Tennyson Road.	ALA250205	21-T07-058	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	San Leandro	Lake Chabot Road Erosion Repair	The Lake Chabot Road Erosion Repair will repair eroded slopes due to January 2023 storms. The project includes excavation, clearing and grubbing, removal of existing rock slope protection and concrete v-ditch. The project will install structural backfill and concrete, soldier piles, and new rock slope protection at two locations along Lake Chabot Road.	ALA250206	21-T01-003	Exempt (40 CFR 93.126) - Safety - Emergency relief (23 USC 125)	Not Modeled

Alameda	Hayward	Tennyson Road Neighborhood Improvements	Multimodal improvements to Tennyson Road from Hesperian Boulevard to Mission Boulevard - for pre-environmental planning/scoping	ALA250207	21-T09-061	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Alameda	Livermore	BPMP - Local bridges preventive maintenance 202219	Bridge Preventive Maintenance for 19 local bridges at various locations in the City of Livermore. See attached Attachment A. The BPMP has been submitted to Caltrans and is being reviewed and processed. Match funds will be from SB1 Gas Tax.	ALA250208	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Alameda	Newark	Thornton Ave Alternate Route Corridor Pavement Reh	Pavement rehabilitation of Thornton Avenue from I880 to Olive Street (Phase 1) and pavement rehabilitation of Thornton Avenue from Ash to Spruce Street (Phase 2). Each phase will also include improvements to the existing bicycle facilities and other safety improvements. Both phases will be implemented as part of one contract.	ALA250209	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Alameda	Livermore	Greenville Road/I-580 Interchange 199149	The project will construct new interchange at I-580/Greenville Road to replace the existing interchange at Northfront and Southfront roads and construct on and off ramps, new traffic signals and safety elements and pedestrian and bicycle facilities.	ALA250210	21-T06-019	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Alameda	Alameda	Lincoln Ave/Marshall Way/Pacific Ave Corridor Imp	Project is located on Lincoln Avenue/Marshall Way/Pacific Avenue between Alameda Point at Main Street/Central Avenue and Broadway. Identified as a high priority for safety and mobility improvements. Project includes road diet - going from four to three travel lanes with a center turn lane and bike lanes - as well as a roundabout at Lincoln Avenue/Fifth Street/Marshall Way, flashing beacons, pedestrian/bicycle signals, modernized traffic signals, crosswalk improvements, school frontage improvements, stormwater gardens, street trees, disabled parking and loading zones, improved lighting and bus stop enhancements. The concept will likely be phased in over time, as street sections are resurfaced and constructed with grant funding. Project web page: https://www.alamedaca.gov/LincolnMarshalPacific	ALA250211	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	Alameda	Oakland Alameda Water Shuttle	Project is beginning as a two-year pilot water shuttle project between west Alameda and Jack London Square in Oakland. Alameda is lead, and WETA is operator, with service starting summer 2024. It falls under WETA's authority for operating on the Bay. The project includes leasing one pontoon boat and adding ADA-accessible ramp upgrades to the existing docks, and operations for two years. The shuttle service will be free for the pilot. If successful and additional funding is found, service will continue beyond the pilot period, and the vessel power will be electrified and dock-side charging will be added. Web page: www.alamedaca.gov/watershuttle	ALA250212	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Alameda	Livermore	Airway Blvd Bridge BR 33C019 at Arroyo Las Positas	The project will replace the existing culverts with a free span bridge to improve creek flow conveyance, mitigate flood risk and include safety elements and pedestrian and bicycle facilities.	ALA250213	21-T01-004	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	ACTC	East Bay Greenway MM Phase 1 Hayward	East Bay Greenway Multimodal Phase 1 Hayward Segment will construct an active transportation facility on the west side of the BART and Union Pacific Railroad corridors to connect the Hayward and South Hayward BART stations through Downtown Hayward. Project improvements will include Class I pathways, Class IV separated bikeways, pedestrian crossing enhancements, bus stop upgrades, raised medians, protected intersections, new and upgraded traffic signals, safety lighting, curb ramp upgrades, and opportunities for stormwater treatment features, street trees, and amenities. In addition, the project will also review and recommend pedestrian-scale improvements along Mission Boulevard. The project forms a segment of the East Bay Greenway Multimodal (Phase 1) which focuses on implementing near-term safety and multimodal access improvements.	ALA250214	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Alameda	Oakland Alameda Estuary Bridge	Design and construct a moveable bicycle/pedestrian bridge across the Oakland Estuary between Alameda's west end and Oakland's Jack London Square. A PID will be completed by mid-2024. The project will create a safe, accessible, and convenient all ages/all abilities facility, where currently the only existing biking/walking facility is a two-way, three-foot-wide, shared-use pathway in the Posey Tube (SR 260) adjacent to vehicles traveling 45 miles per hour or more. This narrow path has inadequate passing space for bicyclists and pedestrians and is not Americans with Disabilities Act (ADA) compliant. The project will reduce the barrier effect of the Oakland Estuary on bicycle and pedestrian travel between western Alameda and downtown Oakland; improve multimodal connectivity between the two cities; encourage mode shift away from single-occupant motor vehicle cross estuary trips; provide a no-cost estuary crossing to better serve equity priority and disadvantaged communities in western Alameda, downtown Oakland and Oakland Chinatown; and increase resilience to climate change and improve disaster recovery for Alameda residents. The project will address a major deficiency on State Route (SR) 260 which does not provide standard, adequate bicycle and pedestrian access between two adjacent metropolitan areas, will close a major gap in the Regional San Francisco Bay Trail network, and will meet the estimated demand for bicycling and walking trips across the estuary. Project web page: www.estuarybridge.org	ALA250215	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	AC Transit	AC Transit: Purchase 10 40ft Zero-Emission Buses	Purchase 10 40ft Zero-Emission Buses	ALA250216	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled

Alameda	Emeryville	The Emeryville Loop	The Emeryville Loop project will provide safe, low-stress biking and walking routes to work and shopping destinations in central Emeryville and install new designated transit lanes. The project closes a major gap in the City's existing active transportation network by providing a new pedestrian connection on Powell Street between Christie Avenue and Shellmound Street. Today, wide multilane arterial roadways that funnel high traffic volumes on and off I-80 pose barriers to people biking, walking, and rolling in the project area. This project will create separation between moving car traffic and people using active modes along high-stress arterials (Powell Street, Christie Avenue, Shellmound Street) and provide intersection improvements to make the arterial crossings safer and more comfortable. The project includes construction of new two-way Class IV separated bikeway facilities on high-stress arterial roadways, construction of new sidewalk to close a gap in the existing walking network, widened sidewalk, the installation of protected intersections at (4) major four to six lane arterial intersections, one new midblock crossing, and dedicated transit lanes. These countermeasures will create a safer, low-stress environment for people biking, walking, and rolling.	ALA250217	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Livermore	Bluebell Drive Bridge at Arroyo Las Positas 202426	The project will replace the existing bridge with a free span bridge to improve creek flow conveyance and include safety elements and pedestrian and bicycle facilities.	ALA250218	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Alameda	San Leandro	Bancroft Ave and Williams St Bicycle Corridor Imp	The project will consist of installing raised class IV bike lanes along Bancroft Ave from E 14th St to north City limit, installing a class IV bike lanes along Williams St from San Leandro Blvd to Neptune Dr. Other components of the projects include traffic signal modifications, installation of RRFB, new .sidewalks, driveways, curb and gutter, bus islands and bus shelters	ALA250219	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	Livermore	Heather Lane Bridge COLV005 at Arroyo Las Positas	The project will replace the existing culverts with a free span bridge to improve creek flow conveyance, mitigate flood risk and include safety elements and pedestrian and bicycle facilities.	ALA250220	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Alameda	Livermore	Bluebell Drive Bridge at Altamont Creek 33C0192, 2	The project will rehabilitate or replace the existing culvert with a free span bridge to improve creek flow conveyance, mitigate flood risk and include safety elements and pedestrian and bicycle facilities.	ALA250221	21-T01-004	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Alameda	San Leandro	Lake Chabot Road Stabilization	The project will install stabilization improvements of 240' and 350' linear feet at two segments of roadway along Lake Chabot Road due to slope depression and slope erosion. Installation of class II AB, HMA, structural backfill and concrete, soldier piles, ground anchor, concrete piling.	ALA250223	21-T08-060	Exempt (40 CFR 93.126) - Safety - Emergency relief (23 USC 125)	Not Modeled
Alameda	Livermore	Holmes Street Bridge 33C0426 at Arroyo Mocho, 2024	The project will replace the existing bridge with a free span bridge to improve creek flow conveyance, mitigate flood risk and include safety elements and pedestrian and bicycle facilities.	ALA250224	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Alameda	Livermore	Isabel Ave and Portola Ave I-580 Interchange 20233	The project will widen the Isabel interchange and the Portola overcrossing by two lanes and construct on and off ramps, new traffic signals and safety elements and pedestrian and bicycle facilities.	ALA250225	21-T06-019	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Alameda	Livermore	Stanley Blvd at Isabel Connector Ramp 202133	The project will implement safety improvements and include curb extensions, crosswalks, ramps, and signal improvements.	ALA250226	21-T07-056	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Alameda	AC Transit	AC Transit: Paratransit Van Replacement	AC Transit: Paratransit fleet: Amortized cost of replacing vans used for AC Transit paratransit service. Vans are operated and replaced by paratransit contractor. FTA funds programmed annually in lieu of programming for replacing vans at end of their useful life. Provide funding for contracted paratransit services for the EB Consortium paratransit service.	ALA990052	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of support vehicles	Not Modeled
Contra Costa	Contra Costa County	Vasco Road Safety Improvements	Contra Costa County: Construction of safety improvements along Vasco Road, a designated inter-regional route, from Walnut Blvd to the Alameda/Contra Costa County line. Beginning approximately 3 miles north of the County line, the completed Phase 1 of the project constructed approximately 1 mile of concrete median barrier and closed a gap in a truck climbing lane/passing lane. Phase 2 of the project will continue the concrete median barrier in the northerly direction through the existing 3-lane segment for approximately 1.5 miles. The existing roadway will be widened to provide the necessary width to construct the median barrier while maintaining the current number of travel lanes. As in Phase 1, associated signing, striping, turn pockets, retaining walls, drainage improvements, wildlife mitigation, bridge widening, and barrier end-treatments will be constructed as needed. Phase 2 will be completed when adequate funding is located.	CC-050030	21-T07-056	Exempt (40 CFR 93.126) - Safety - Truck climbing lanes outside the urbanized area	Not Modeled
Contra Costa	Brentwood	Lone Tree Way Undercrossing	Brentwood: On Lone Tree Way at the UPRR track: Construct a grade separation underpass consisting of four travel lanes crossing under the railroad. Construct a concrete bridge structure, relocate numerous existing wet and dry utilities, high pressure gas lines, storm water pump station, retaining walls and landscaped parkway. CIP 336-3134.	CC-070013	21-T07-056	Exempt (40 CFR 93.126) - Safety - Railroad/highway crossing	Not Modeled
Contra Costa	ECCTA	ECCTA: Transit Bus Replacements	Tri-Delta Transit: 12 MY 1997 Transit Buses 7 MY 1998 Transit Buses 3 MY 2001 Transit Buses 20 MY 2001 Gillig Low Floors 1 MY 2003 Cutaway Van 1 MY 2006 Cutaway Van 4 MY 2010 Dodge Minivans 2 MY 2007 Chevrolet Minivans 6 45' over the road coaches 25 Ford cutaway DR vans 4 45' OTR coaches: Replace vehicles Clipper II Digital Comm Equip and 30 MDT terminals Procure equipment FY21 8 40-ft diesel buses FY23 30 DR cutaway buses.	CC-070092	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Contra Costa	CCTA	SR 239 - New State Highway Study	Contra Costa County: SR 239 between SR4 in Brentwood and I-205 in Tracy: Conduct environmental and design studies to create a new alignment for SR239 and develop corridor improvements from Brentwood to Tracy.	CC-110066	21-T06-044	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled

Contra Costa	Danville	San Ramon Valley Blvd Improvements	Danville: San Ramon Valley Blvd from the Town Limits (south end, south of Ridgeland Circle) to Hartz Avenue (north end): Improvements consists of pavement slurry seal, pavement rehabilitation (dig-out repairs and overlay), pavement striping, ADA curb ramp upgrades, utility frame adjustments, replacing traffic signal devices, drainage inlet repairs, concrete sidewalk and bus stop repairs and traffic calming devices. Section 1 - Town Limits (south of Ridgeland Circle) to Sycamore Valley Road: Consists of pavement dig-out repairs, slurry seal, and pavement restriping. Restriping includes Class IIB bicycle lanes and high-visibility pavement markings. Section 2 - Sycamore Valley Road to Hartz Avenue: Pavement digout-repairs and pavement overlay, pavement restriping. Restriping includes Class IIB bicycle lanes and high-visibility pavement markings.	CC-170001	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Contra Costa	San Ramon	Iron Horse Trail Bike and Pedestrian Overcrossing	San Ramon: At the intersections of Bollinger Canyon Road and the Iron Horse Trail: Construct bicycle/pedestrian overcrossings. This work includes construction of the overcrossings, utility work, stormwater mitigation, ADA compliance, and landscape restoration.	CC-170014	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	San Pablo	Giant Road Pavement Rehabilitation	San Pablo: Giant Rd between Brookside Drive and Miner Avenue: Rehabilitate street pavement with an overlay and slurry seal, upgrade curb ramps to current ADA standards, replace striping, and eliminate sidewalk hazards.	CC-170031	21-T08-060	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Contra Costa	Antioch	Antioch - L Street Pathway to Transit	In Antioch, construct concrete curb, gutter, sidewalk, dwys & ADA curb ramps, minor median island modifications, pavement micro-surfacing & ped safety flashing beacons on L St from Lemontree Way to Sycamore Dr and from 10th St to terminus of L St at Antioch Marina Circle. Re-striping to provide a Class II bike lane on L St from 10th St to Antioch Marina Circle & Class III bike route from Lemontree Way to Sycamore Dr. All work is w/in City ROW. Future Ph 2 includes traffic signals upgrades & new bus shelters.	CC-170035	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Concord	Concord Willow Pass Road Repaving SR2T	Concord: On Willow Pass Road (WPR) between Galindo Street and San Vincente Drive: Rehabilitate the pavement and repair damaged sidewalk, curb and gutter. Include an option to extend paving to Landana Drive) Existing curb ramps will be replaced to meet current ADA standards Pavement will be milled 4" and backfilled with 4" of hot mix asphalt (HMA) with a CIR section from Galindo St to San Vincente Drive (with a bid alternative to extend the work to Landana Drive) This pavement rehabilitation method will retain the existing grade of the pavement and will not cause excessive cross slope. The pavement base failure areas will be dug out after the milling and prior to placement of HMA wearing course. This project is combined with the Willow Pass Road Safe Routes to Transit Improvements. This project closes two sidewalk gaps and enhances an uncontrolled multi-lane pedestrian crossing on Willow Pass Road in eastern Concord. The sidewalk gap closures will provide ADA-compliant access to multi-family housing, bus stops, markets, Wren Elementary School and other amenities. The project includes the replacement and relocation of an outdated pedestrian warning system with a pedestrian hybrid beacon across Willow Pass Road at San Vincente Drive to connect residences to these amenities. A separate project will install a new rectangular rapid flashing beacon (RFFB) on Willow Pass Road at Ashdale Drive. The project will provide ADA-compliant access to multi-family housing, bus stops, markets, Wren Elementary School and other amenities. The project will include striping and signage for a Class IV cycle track on the north side of WPR from Parkside Drive to Landana Drive. To accommodate the cycle track, westbound travel lanes will be reduced from 2 to 1 from Landana Drive to Farm Bureau Road and some on-street parking from Farm Bureau Road to Parkside Drive is to be removed. The project includes bioretention, adjustment of traffic signals, grading, and landscaping to conform the improvements.	CC-170037	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Contra Costa	Pittsburg	Pittsburg BART Pedestrian and Bicycle Connectivity	Pittsburg: On California from Railroad to Harbor, Adjacent to SR4 from Railroad to Bliss Ave parking Lot, on Railroad from Delta DeAnza Trail to BART Station: construct Class I bikeways and associated imps. On Railroad from California to 17th: Construct Class II buffered bike path. Includes construction of multiuse Class I bikeways and Class II buffered bikeways, California Street and trail lighting, Railroad Avenue Street lighting, trail lighting along Bliss Avenue, intersection corner treatments, crosswalk treatment, modified driveways, benches, wayfinding and service information signage, traffic street light improvements, bioretention basin and water quality features, irrigation, and landscaping improvements.	CC-170040	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Pittsburg	City of Pittsburg Pavement Improvements	Pittsburg: On West Leland Rd from Woodhill Rd to Railroad Ave and on Loveridge Rd from Buchanan Rd to Pittsburg-Antioch Highway: Rehabilitate roadway. Rehabilitation may include crack sealing, base repairs, patch paving, milling, geosynthetics, as well as thin and thick asphalt concrete overlays. Federally participating sections include West Leland Rd from S Broadway to Serrano Way, West Leland Rd from Crestview Dr to Railroad Ave, and Loveridge Rd from Pittsburg-Antioch Highway to SR-4. Federally non-participating sections include West Leland Rd from Woodhill Dr to S Broadway, West Leland Rd from Serrano Way to Crestview Dr, and Loveridge Rd from SR-4 to Buchanan Rd.	CC-170042	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Contra Costa	Concord	Downtown Corridors Bike/Pedestrian Improvements	Concord: Various locations on multiple corridors connecting Downtown Concord to regional transit, senior housing, and low income communities: Make bicycle and pedestrian safety improvements including 1. relocate crosswalks, install high-visibility crosswalk markings, add pedestrian-oriented lighting, extend curbs and improve curb ramps, and widen a portion of sidewalk in a key location on Salvio Street and Broadway St, 2. install new bicycle facilities on Oak Street, upgrade portions of Salvio Street to full bicycle lanes, and close a bicycle facility gap on Grant Street by installing a contraflow lane, and 3. build on related city projects to add bicycle lanes on Grant Street and shared lane markings to Salvio Street near Todos Santos Plaza.	CC-170050	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Contra Costa	Martinez	Alhambra Avenue Downtown Resurfacing	Martinez: Alhambra Avenue from Marina Vista Avenue to Jones Street in the Downtown PDA: Resurface pavement with a 3" grind and overlay including base failure repairs, crack sealing, upgrade curb ramps to current ADA, adjust utility covers, and restriping	CC-170059	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled

Contra Costa	BART	Concord BART Station Modernization	Concord: In and around the Concord BART Station: Make capacity, access, placemaking, and state-of-good repair, improvements based on BART's 2016 Station Modernization Plan. Station improvements will focus on addressing state-of-good repair issues, improving station lighting, improving passenger circulation, expanding bicycle access, reducing fare evasion, and adding new architectural finishes, wayfinding, and public art to enhance customer experience, sense of safety, and placemaking.	CC-170060	21-T11-115	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Contra Costa	CCTA	Innovate680:Coordinated Adaptive Ramp Metering Ph1	Contra Costa County: on NB I-680 between Alcosta Blvd to Olympic Blvd: Implement Coordinated Adaptive Ramp Metering	CC-170062	21-T07-057	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Contra Costa	Contra Costa County	Treat Boulevard Corridor Improvements	Contra Costa County: Implement bicycle infrastructure and pedestrian enhancements along Treat Boulevard between North Main Street and Jones Road in unincorporated Walnut Creek. Improvements include creating buffered bicycle lanes and a mixed-use path, existing crosswalk enhancements, closing three free right-turn lanes, eliminating a traffic bottle-neck, signal relocations, and signal improvements.	CC-190012	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Contra Costa	CCTA	Bay Area MOD	CCTA: In the I680 Corridor and surrounding communities: Develop an integrated and scalable platform & application (app) aimed at reducing traffic congestion. The Bay Area MOD app will be a one-stop shop to assist travelers with mobility choices by seamlessly connecting multiple forms of shared and active transportation. The Bay Area MOD will provide real-time multi-modal trip planning options based on a user?s origin and destination. The app will include a uniform payment system and offer incentives based on time of day and mode in an effort to incentivize and reward desired travel behaviors. Other Federal Funds are ATCMTD.	CC-190018	21-T03-009	Exempt (40 CFR 93.126) - Other - Grants for training and research programs	Not Modeled
Contra Costa	EBRPD	SF Bay Trail Point Molate	EBRPD: Along the shoreline connecting the bike/pedestrian trail over the Richmond-San Rafael bridge to the Point Molate Beach Park in the City of Richmond: Construct SF Bay Trail segment. Most of this segment of Bay Trail will be constructed within a 1.1 mile easement donated to EBRPD from Chevron Corporation, granting access to shoreline previously closed to the public. The project proposed to construct 1.25 miles of Bay Trail, highlight some of the rich history within the project area, and restore and enhance portions of the SF Bay shoreline for better species habitat and public enjoyment.	CC-190019	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Contra Costa County	North Bailey Road Active Transportation Corridor	Contra Costa County: On Bailey Road between Willow Pass and Canal Roads in unincorporated Bay Point: Narrow the four travel lanes and median to accommodate a separated two-way cycle track on the west side of Bailey Road, expand sidewalks on both sides of Bailey Road and install a landscaped buffer zone along the curb for enhanced pedestrian and bicyclist safety. Installation of a new traffic signal, ADA-compliant curb ramps, expanded sidewalks, and crosswalk enhancements will improve accessibility for all modes of active transportation.	CC-210001	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Lafayette	Lafayette Town Center Pathway and Bike Station	Lafayette: Between the BART station and downtown: Construct bicycle and pedestrian improvements including a new modular, self-park bike station at the south entrance of the Lafayette BART station, as well as a new pedestrian-oriented plaza and shared-use pathway to improve the connection between the south entrance and downtown Lafayette.	CC-210004	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Richmond	Richmond 13th Street Complete Streets Imps	Richmond: Along 13th St from Harbour Way to Costa Ave: Implement complete streets improvements including protected bicycle facilities, various pedestrian improvements, and a road diet with traffic striping and pavement markings.	CC-210007	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Contra Costa	ECCTA	ECCTA Hydrogen Fueling Maint Infrastructure Upgrad	ECCTA: Maintenance facility: Upgrade infrastructure needed for the safe maintenance of fuel cell electric buses in the same facility as diesel buses. Maintenance facility upgrades include upgrade electrical including lighting, upgrade ventilation including HVAC, fans and roof vents, install gas detection and alarm systems, install rolling fire doors, wall off/enclose the mezzanine and entryway into older structure of maintenance facility. RTPID 21-T07-057	CC-210008	21-EN08-131	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Contra Costa	Caltrans	Central Ave I-80 Undercrossing Ped/Bike Improve	Richmond: On Central Ave crossing I-80 between San Joaquin St/Jacuzzi St and San Luis St/Pierce St: Improve ped/bicycle access with wider sidewalks, new sidewalk-level bikeways, crossing improvements, ped lighting, and fencing.Improvements include reconstructing wider sidewalks, new sidewalk-level bikeways, curb ramp modifications for new bikeways, improved ADA access, high-visibility crosswalk markings, green bikeway intersection markings, signage. The project will relocate existing electrical systems, add lighting underneath the freeway undercrossing, replace fencing between sidewalks and freeway abutments, railing between freeway columns adjacent to the new bikeways. This will improve pedestrian, bicycle comfort, safety, mobility while significantly reducing the level of stress for all users by providing a dedicated bikeway and wider walkway.The project improves access to adjacent neighborhoods that have high density housing, a variety of local and regional retail businesses, grocery stores including Pacific East Mall, El Cerrito Plaza, Costco, El Cerrito High School. It will increase access to jobs via regional transit, including the El Cerrito Plaza BART Station, AC Transit?s Rapid Bus, Transbay L Route at Central Ave and San Pablo Ave, and Route 80 (Claremont District/El Cerrito Plaza BART) on Pierce St and Central Ave. It will improve regional trail and park access including the San Francisco Bay Trail, Ohlone Greenway, and Richmond's Central Park.	CC-210011	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	East Bay Integrated Transit Plan	Contra Costa County. The ITP will include a countywide study of transit services and travel markets to advance strategic coordination among bus transit operators in Contra Costa and between bus transit operators and BART. The study will inform the development of an ITP to be executed by CCTA and the Contra Costa bus transit operators, and included in larger regional transit integration plans. The Study will identify obstacles and opportunities for countywide transit service coordination and define certain routes/service areas for regional, subregional, and community transit operations (i.e., express, feeder service to BART, First/Last Mile to transit hubs). It will consider integrated fares, signal priority, improved access to park-and-ride locations, shared mobility hubs, integration with the Mobility-on-Demand multi-modal trip planning application, connection protection, ITS/capital projects, wayfinding, real-time information, scheduling coordination.	CC-210012	21-T10-093	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled

Contra Costa	San Ramon	San Ramon Transit Center - Shared Mobility Hub	San Ramon: At San Ramon Transit Center/Bishop Ranch Business Park: Implement multi-modal mobility improvements. The San Ramon Transit Center is located in the City's PDA, adjacent to the Iron Horse Regional Walking/Biking Trail and within the Bishop Ranch Business Park. Project includes improvements consistent with MTC's Shared Mobility Hub grant. The project includes the installation of new electric message boards alerting transit riders with real time transit messages, local/regional transit news and local updates transit center amenities adding more bike lockers, bike fix-it stations rehabilitating existing pavement and providing improved access for the public through ADA compliant upgrades and improved way finding and updating amenities. The overall sustainability of the transit center will be further enhanced with the addition of storm water treatment area that will accommodate run off from approximately 75% of the hub.	CC-210013	21-EN09-132	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	MTC	Regional Planning Activities and PPM - CC County	Contra Costa County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on CC-170004	CC-210014	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Contra Costa	WCCTA	WestCat 45-foot Over the Road Coach Replacement	WestCAT: 45-foot over the road coach subfleet: Replace two vehicles past their useful life	CC-210015	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Contra Costa	ECCTA	ECCTA: Hydrogen Fueling Station	ECCTA: At the ECCTA maintenance facility located at 801 Wilbur Avenue, Antioch, CA 94509: Design and construction of a stand-alone hydrogen fueling station with the capacity to fuel up to 30 fuel cell electric buses	CC-210017	21-EN08-131	Exempt (40 CFR 93.126) - Mass Transit - Purchase of office, shop, and operating equipment for	Not Modeled
Contra Costa	CCCTA	CCCTA Electric Bus Charging Infrastructure	CCCTA: At the Arnold Industrial Way Facility: ZEB Infrastructure Set-Aside Funds for Electric Bus Charging Infrastructure	CC-210201	(blank)	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Contra Costa	EBRPD	Martinez Bay Trail Gap Closure	East Bay Regional Parks District: Along the Carquinez Loop Trail and SF Bay Trail in the vicinity of Berrellesa St: Close a 0.5 mile gap by constructing a shared-use path along with crossing improvements	CC-230001	21-T01-003	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	CCTA - Countywide Smart Signals	The project will develop, manage, and implement Intelligent Transportation System (ITS) initiatives such as upgrading the existing legacy systems, providing interconnectivity throughout Contra Costa County signal systems and enhance the sharing of real-time information between agencies and the public. A unified signal technology and communication system throughout the County will enable the region to prepare for emerging transportation technologies and future Smart Cities initiatives. The project includes cloud-based Transit Signal Priority (TSP) technologies to promote transit usage reducing delay and transit times for transit vehicles. The traffic signal upgrades also include video analytics that provides ability to Identify "near miss" situations and take proactive approach to prevent future occurrences. Other State funds are LPP	CC-230202	21-T07-057	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Contra Costa	Pittsburg	Pittsburg's Delta de Anza Multimodal Trail Safety	The Pittsburg's Delta De Anza Multimodal Trail Safety Improvements Project will implement a series of critically needed safety and operational enhancements to the Delta De Anza Trail within the communities of Bay Point, Pittsburg, and Antioch. Within these communities, 35 at-grade crossing exist on the Delta De Anza Trail. In coordination with Contra Costa County, City of Antioch, East Bay Regional Park District, and EBMUD, the City of Pittsburg will design, and construct the following improvements: 1) Delta de Anza Trail Crossing Intersections - Install raised crosswalks, rapid rectangular flashing beacons, high-visibility crosswalks, lighting, wayfinding signage, and green bike lanes; 2) Delta de Anza Trail improvements - Install landscaping, lighting, trail pavement, fencing, and other improvements consistent with the City's Living Green Gardens for sustainability.	CC-230203	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Richmond	McBryde Avenue Safe Routes to Parks	The project will create a safe and comfortable walking and biking route from an existing bike route on 37th Street, through the San Pablo Ave PDA, and across I-80 to Wildcat Canyon Regional Park. Improvements include resurfacing, a road diet from 4 to 2 vehicles lanes with a center turn lane and bike lanes, traffic signal modifications, curb ramps, curb extensions, high visibility crosswalks, sidewalk gap closures, traffic calming, and street trees.	CC-230204	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Contra Costa	Richmond	Bayview to BART	The project will create a safe and comfortable walking and biking route connecting the Del Norte BART station to the San Francisco Bay Trail. It capitalizes on existing multi-use paths, ties in to El Cerrito's Transit Oriented Development Complete Streets Projects, and will improve conditions around parks and schools. The project will build Class II bike lanes on Potrero Ave and Class IV protected bike lanes on the Bayview Ave overpass over I-580. Locations include S 51st St, Bayview Ave, Ells St, Ells Path, Cypress Path, Cypress Ave, S 47th St, S 49th St, Potrero Ave in Richmond.	CC-230205	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Walnut Creek	Walnut Creek Safe Routes to School Infrastructure	This project consists of infrastructure improvements that enhance safety and close gaps in the existing sidewalk network for pedestrian and bicyclists in the vicinity of schools and along known walking and bicycling routes to schools.	CC-230206	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Pinole	Bay Trail Gap Closure at Tennent Avenue	This project closes a 600 foot gap in the San Francisco Bay Trail linking the communities of Hercules, Pinole, and unincorporated Contra Costa County. Furthermore, this refines the crossing locations of a heavily traveled Union Pacific tracks improving safety for pedestrians and bicyclists.	CC-230207	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	Contra Costa Countywide Safe Routes to School	The Contra Costa Countywide Safe Routes to School Program will expand upon three subregional programs known as Street Smarts Diablo Region (SSDR), Street Smarts San Ramon Valley Program (SSSRVP), and Contra Costa Health Services (CCHS) Safe Routes to School Program to offer bicycle and pedestrian safety awareness education and encouragement to include every K-12 public school in Contra Costa County. The program will be available to serve all 170,000 students attending each of the 274 elementary, middle, and high schools within Contra Costa County's 18 school districts. The program will be offered annually to all schools.	CC-230208	21-T09-061	Exempt (40 CFR 93.126) - Other - Grants for training and research programs	Not Modeled
Contra Costa	Concord	Galindo Street Multimodal Corridor Project	On Galindo St. between Salvio St. and Clayton Rd; a new Class I bike path on the east side of the roadway. The segment between Salvio St. and Concord Blvd. is proposed to have a 10-foot-wide Class I shared bike/ped path. The segment between Concord Blvd. and Clayton Rd. is proposed to have a 12-foot-wide Class I path. The proposed Class I path will be separated from the street varying from 2 to 7 feet. The project includes vertical delineators on existing Class II bike lane on Clayton Rd. from Galindo St. and Grant St. to convert into a Class IV bike lane. RTIP ID 21-T08-060.	CC-230209	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Contra Costa	Lafayette	Connecting Lafayette: Downtown Pathways and School	The project would result in a Class I multi-use facility along School Street, a pathway along Topper Lane, and construction of a sidewalk along a segment of St. Mary's Road in Lafayette, CA.	CC-230210	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	Concord	Willow Pass Road Bike Lane Connection	Concord: Along Willow Pass Rd from Parkside Dr to Landana Dr and on Parkside Dr from Willow Pass Rd to Salvio St: Construct a protected Class IV cycle track along Willow Pass Road and Class II bicycle lanes on Parkside Drive. Install RRFBs and green conflict markings at a key intersection. It further fills a gap in the bicycle network that connects with planned and funded Downtown corridor improvements and ultimately provides a bikeway connection from the neighborhoods along the Willow Pass Road to the BART station. The project provides vital bicycle and pedestrian connections to multiple schools, a regional trail (Contra Costa Canal Trail), a regional train station (BART), and Downtown Concord. There are several healthcare centers, offices, churches, and multi-family housing units located along the corridor. Over seventy-five percent of students at Mt. Diablo High, Olympic Continuation High, and Wren Avenue Elementary qualify for Free or Reduced Price Meals. Both schools enroll students from the low-income census tract encompassing downtown Concord (0601332800). The project further connects to several ongoing projects that are improving bicycle and pedestrian facilities in the downtown, allowing residents and students to access key downtown destinations and routes leading to the BART station. A portion of this project is also a part of the Safe Routes to Transit Program (SR2T). This project will create an "all ages and abilities" network enabling children and families to safely and confidently walk and bicycle to school.	CC-230211	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCCTA	CCCTA - Transit Corridors Study	The Transit Corridors Study will analyze four major corridors in County Connection's core service area and identify options to improve speed and reliability of buses. The study will assess current conditions, including operations, existing infrastructure, and ridership; gather passenger and community feedback; and develop recommendations for capital improvements that would reduce delays and travel time and ultimately enhance the customer experience.	CC-230212	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Contra Costa	Contra Costa County	San Pablo Ave Complete Streets/Bay Trail Gap Closu	Contra Costa County: Unincorporated Rodeo/Crockett: Implement a road diet and construct a Class I shared-use path along San Pablo Avenue from Pacific Ave to Pomona Street in unincorporated communities of Rodeo and Crockett. Project closes a 3.2-mile gap of the San Francisco Bay Trail.	CC-230213	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Contra Costa	Contra Costa County	Pacifica Avenue Safe Routes to School	Contra Costa County: Reconfigure roadway with 2,400 feet of two-way cycle track, 400 feet of new sidewalk, 500 feet of widened sidewalk, narrower travel lanes, bulb-outs, and 3 new raised crosswalks on Pacifica Avenue in unincorporated Bay Point.	CC-230214	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	San Pablo	San Pablo's Safe Mobility	The Broadway-El Portal Safe Routes (BESR) Project will construct a 1.25-mile, separated & protected, 2-way bicycle "cycletrack," & Safe Routes to School (SR2S) improvements between this cycletrack and Lake Elementary, Bayview Elementary and Helms Middle School. Additional pedestrian & transit improvements included in the BESR project are bus boarding islands—to facilitate safe transit usage that is safely integrated with the cycletrack—and an enhanced bicycle connection to an unincorporated neighborhood in Contra Costa County. Project will also include additional cycle track improvements to link SR2S improvements to the Contra Costa Community College transit center with cycletrack improvements to Mission Bell Drive, Moraga Road, Castro Road, and Campus Drive. This project also includes non-infrastructure components for safe routes to school. These non-infrastructure components will be carried out by Contra Costa Health Services. CC Health Services' $24K contribution is reflected under the "Other Local" fund line.	CC-230215	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCCTA	CCCTA - Replace 22' Vehicles	CCCTA: Fleet: Replace 15 22' paratransit vehicles	CC-230216	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Contra Costa	CCCTA	CCCTA - Replace 40' Buses	CCCTA: Fleet: Replace 10 40' diesel buses	CC-230217	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Contra Costa	CCCTA	CCCTA - Replace Paratransit Vans	CCCTA: Fleet: Replace 3 paratransit vans	CC-230218	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Contra Costa	Pittsburg	Pittsburg Center Smart City Pilot	This project consists of implementing smart city technologies 1/4 mile transportation grid surrounding the Pittsburg Center BART station with connected technologies such as adaptive streetlights, connected traffic signals, and digital/static wayfinding signage. These upgrades will help encourage transit use, encourage walking and bicycling by creating safer and more complete streets, alleviate traffic, and attract local businesses.	CC-230219	21-T07-057	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Contra Costa	CCTA	Martinez Amtrak Shared Mobility Hub	Project includes improvements to the Martinez Amtrak Station to enhance the facility to a shared mobility hub, including reconfigure surface parking lot to a transit center; improve passenger pick up drop off area; install signage/wayfinding; and bike/ped improvements at the Amtrak Station and the streets around the Amtrak Station.	CC-230220	21-T08-060	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Contra Costa	Walnut Creek	Ygnacio Valley Road Fiber Infrastructure	This project will install fiber optic communication infrastructure and technologies on Ygnacio Valley Road between I-680 & Oak Grove Road	CC-230221	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Contra Costa	Martinez	Downtown Martinez Parking Technology Upgrades	Complete upgrade to the parking technology in downtown Martinez. Removal of individual meters and installation of multi-space parking kiosks that accept credit card and RFID payments. Installation of new wayfinding signage to better direct motorists to available parking.	CC-230222	21-T07-057	Exempt (40 CFR 93.126) - Other - Directional and informational signs	Not Modeled
Contra Costa	Orinda	Lamorinda Smart Signal System Project	This project will enable the City of Orinda to upgrade the region of Lamorinda which includes the cities of Lafayette, Moraga and Orinda to a smart signal system that can: synchronize signals with each other and optimize traffic flow to smooth congestion; prioritize transit and emergency vehicles as needed; reduce emissions; use video detection and analytics to proactively identify "near miss" situations (for vehicles, bicycles, and pedestrians) and report those back to a traffic management center to aid in efforts to reach countywide Vision Zero goals; and facilitate the exchange of real-time information that will be essential to support future emerging technologies included connected and automated vehicles.	CC-230225	21-T07-057	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled

Contra Costa	Danville	Danville - Townwide Traffic Signal Modernization	The Townwide Traffic Signal Modernization/ITS project in the Town of Danville will modernize its traffic signal network, including replacing the Town's aging traffic signal hardware, vehicular detection systems, and communications infrastructure. It would improve bicycle, pedestrian, and vehicular safety; air quality and GHG emission reductions; connectivity; and reduce travel time.	CC-230226	21-T07-057	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Contra Costa	CCTA	Concord Smart Signals Project	The Concord Smart Signals Project will upgrade traffic signals to a smart signal system within the City of Concord to help reduce congestion and emissions, prioritize transit and emergency vehicles, and protect vulnerable road users.	CC-230227	21-T07-057	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Contra Costa	San Ramon	Crow Canyon Iron Horse Trail Bike-Ped Crossing	Design a new bicycle and pedestrian overcrossing to convey the Iron Horse Trail traffic over Crow Canyon Road.	CC-230228	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	Bollinger Canyon Rd Shared Mobility Hub	Shared Mobility Hub (SMH) at Bollinger Canyon Rd is one of the stops for the future I-680 Express Bus. The SMH includes elements such as enhanced bike/pedestrian facilities, bike chargers, connection to the Iron Horse Trail, transit signal priority, WiFi, real time traveler information, and bus bays.	CC-230229	21-T12-122	Exempt (40 CFR 93.127) - Bus terminals and transfer points	Not Modeled
Contra Costa	CCTA	Antioch Bike Garden	The Antioch Bike Garden project will build a one-of-a-kind facility for teaching bicycle and pedestrian safety education to encourage the use of pollution-free transportation. Using small scale modern streetscape design elements, this unique facility will be built in the City of Antioch's Prewett Park and will provide healthy, fun, outdoor recreation in a safe, vehicle-free environment. Learning stations throughout the course will aid group instruction and allow for self-guided education.	CC-230230	21-T02-008	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	L Street Pathway to Transit – Bicycle and Pedestri	The project includes Phase 2 improvements on L Street between 9th Street and Sycamore Drive in the City of Antioch, about 0.5-mile section. These improvements include new sidewalks under the railroad tracks and along the fairground, installing ADA compliant curb ramps, re-striping to allow for multi-modal facilities between 9th Street and Sycamore Drive, improving multimodal safety and operations along the corridor, and intersection improvements including traffic signal modifications at 10th Street, E18th Street and Sycamore Drive. Other improvements include new bus stops and bus shelters, trail access and connection to bike facilities and sidewalks. "L" Street is on a Tri-Delta Transit bus route that serves and connects the PDA and the Equity Priority Area and serves Contra Costa County low and moderate housing development around "J" Street. "L" Street terminates at the entrance to the existing multi use Delta Trail/waterfront promenade which connects and serves the Antioch Amtrak Station.	CC-230231	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	SF Bay Trail Gap Closure: Martinez Intermodal Stat	The Martinez Intermodal Station - Crockett Bay Trail Gap Closure Project will close a 0.5-mile gap in the 23-mile Carquinez Strait Scenic Loop Trail (CSSLT) and the 500-mile San Francisco Bay Trail. This project will construct a portion of the San Francisco Bay Trail that will connect Carquinez Regional Shoreline property on Carquinez Scenic Drive via an easement on the Union Pacific (UP) Railroad right-of-way to the existing public at-grade crossing at Berrellesa Street, then continuing north on Berrellesa Street to the existing San Francisco Bay Trail on the north end of the street.	CC-230232	21-T01-003	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCTA	Richmond Street Complete Streets Improvement	The project will improve Richmond Street, a minor arterial, to provide safe and accessible pedestrian connections between El Cerrito's residential neighborhoods to the El Cerrito del Norte and Plaza BART Stations, schools, civic and recreational destinations, commercial districts, and the City's San Pablo Avenue Priority Development Area (PDA). The project will improve access and safety for all modes of travel by rehabilitating the pavement; installing high-visibility crosswalks, roadway safety lighting, and rapid rectangular flashing beacons at uncontrolled crosswalks; installing enhanced traffic signing, green pavement markings, and signs to enhance the existing shared-lane bike facility (which complements the low-stress Ohlone Greenway, just 1-3 blocks West); installing painted tear-drop medians and in-fill streets trees for traffic calming; implementing safety upgrades at the Elm/Key/Hill Streets traffic signal; installing ADA compliant curb ramps; and repairing/replacing non-conforming sidewalk. Upgrades to the vehicle signal loop detection to enhance bike detection at the four signalized intersections within the project limits are proposed as part of the separate countywide CCTA Smart Signals project.	CC-230233	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Contra Costa	CCTA	Moraga Road and Canyon Road Complete Streets	The Moraga Road and Canyon Road Complete Streets Project will be implemented along Moraga Road between St Mary's Road and Moraga Way, and Canyon Road between Moraga Way and Sanders Drive, within the PDA in Downtown Moraga. Based on conceptual plans, the project scope is currently estimated to add 1233 LF new sidewalks, replacing/repairing 1872 LF nonconforming sidewalks, installing 14 ADA-accessible curb ramps, 12 Solar-powered Rectangular Rapid Flash Beacons (RRFBs), intersection timing with leading pedestrian intervals, 4 median pedestrian crossing noses, 4600 LF enhanced Class II bike lanes with buffer zones, pavement renovation, 25 street trees along new sidewalk, 3 new bus stop shelters with people-friendly benches and solar-power-compacted garbage bins, speed feedback signs, and other necessary improvements. The improvements will tie into previously constructed and future projects providing continuous safe routes for the residents of outlying rural areas connecting low-income residents to the schools and services within Moraga and provide improved access to active transportation modes.	CC-230234	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	CCCTA	CCCTA Replace (10) 40ft Urban Buses	Replace 10 40 ft diesel buses that have reached the end of their useful life.	CC-230236	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled

Contra Costa	Moraga	St. Mary's Road Multimodal Safety Improvement Proj	The Project will construct a three-way signal-controlled intersection at the St. Mary's Rd/Rheem Blvd intersection, a designated left-turn pocket with optional traffic signal at the St. Mary's Rd/Bollinger Canyon Rd intersection, and modifications to roadway alignment. Rheem Blvd will be widened in order to construct a Class II bike lane, which will connect to a Class I shared-use path along St. Mary's Rd.	CC-250201	21-T08-060	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Contra Costa	El Cerrito	El Cerrito BART to Bay Trail Connection	Connect El Cerrito Plaza BART Station and the San Francisco Bay Trail. The project will evaluate & implement multiple on- and off-street alignment alternatives to implement all ages and abilities bikeways between these two endpoints. Potential treatments include separated bicycle facilities, protected intersections, signalized and flashing beacon crossing treatments, and protected vehicle-bicycle phasing to enhance safety.	CC-250202	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Contra Costa	ECCTA	ECCTA: Comprehensive Operational Analysis	The purpose of this project is to perform a comprehensive operational analysis of ECCTA's mobility services and redesign its transit system. The new mobility network should harmonize with Contra Costa Transportation Authority's Integrated Transit Plan, the Countywide Transportation and Mobility Hub Plans as well as the Metropolitan Transportation Commission's various regional plans to recapture current and future ridership in the region.	CC-250203	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Contra Costa	Contra Costa County	Kirker Pass Road Southbound Truck Climbing Lane	Contra Costa County: Install an additional truck climbing lane in the southbound direction of Kirker Pass Road starting 1,200 south of Nortonville Road to Concord City Limit and provide intersection improvements at the south Hess Road intersection in unincorporated Concord.	CC-250204	21-T09-061	Exempt (40 CFR 93.126) - Safety - Truck climbing lanes outside the urbanized area	Not Modeled
Contra Costa	Contra Costa County	Pacheco Boulevard Improvements	Contra Costa County: Widen roadway, add shoulders, add bicycle and pedestrian improvements, realign curves and install roadway modifications along 5.1 miles of Pacheco Boulevard from Blum Road to Morello Avenue in unincorporated Pacheco.	CC-250205	21-T08-060	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Marin	GGBHTD	Golden Gate Bridge Seismic Retrofit, Phase 3B	This project would retrofit the Golden Gate Bridge to withstand a maximum credible earthquake (magnitude Richter of 8.3) occurring on the nearby San Andreas or Hayward Faults. Seismic retrofit construction has been divided into three phases: Phase 1 includes implementation of seismic retrofit measures to the north approach viaduct and implementation of environmental mitigation measures. Phase 2 includes implementation of seismic retrofit measures to the south viaduct, south anchorage housing, Fort Point Arch, pylons S1 and S2, and utility modifications throughout the south approach structures. Phase 3 includes implementation of seismic retrofit measures to the suspension bridge, south pier and fender, north pier, north anchorage, and pylon N1. Earmarks: HBB SAFETEA earmark $50M (for first year see MRN970016)	MRN050018	21-T01-005	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Marin	GGBHTD	Golden Gate Bridge-Suicide Deterrent SafetyBarrier	Conduct environmental analysis, engineering studies and preliminary engineering to determine alternatives and feasibility for a physical suicide deterrent system on the Golden Gate Bridge. Construct suicide deterrent system. Project includes wind-retrofit. Other State funds are Proposition 63 funds.	MRN050019	21-T01-007	Exempt (40 CFR 93.126) - Safety - Safer Non-Federal-Aid system roads	Not Modeled
Marin	GGBHTD	GGBHTD: Facilities Rehabilitation	GGBHTD: Systemwide: As part of the District's Maintenance and Operating Facilities Program, this project will ensure that District facilities are properly maintained to achieve optimum performance and will achieve the maximum economic useful life from existing fixed assets including, but not limited to roofs, HVAC systems, air compressors and parts cleaners.	MRN050025	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Marin	GGBHTD	GGBHTD - Transit Systems Enhancements	GGBHTD: Systemwide: systems, technology and communication enhancements to transit fleet and facilities.	MRN130015	21-T01-002	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Marin	GGBHTD	GGBHTD Ferry Major Components Rehab	GGBHTD: Systemwide: Rehabilitate and replace major ferry components including navigation systems, onboard monitoring and alarm systems, interior components, boarding apparatus, hull, lifesaving equipment, propulsion systems and other ferry components. Prior funding for this program is programmed on MRN030011. $2.2M in FY17 funds are FTA Passenger Ferry Grant Program funds	MRN150014	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
Marin	MCTD	MCTD: Replace Paratransit Vehicles	MCTD: FY17- 3 local 22ft paratransit cutaway gasoline vehicles: Replace contractor owned vehicles FY20- 16 local 22ft 2015 Starcraft paratransit cutaway gasoline vehicles: FY25- Replace 5 paratransit cutaway vehicles	MRN170003	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Marin	MCTD	MCTD: Replace Paratransit Vehicles with Vans	MCTD: 6 vehicles: Replace 5 local 22ft paratransit cutaway gasoline vehicles with accessible vans and purchase a third vehicle as a non-revenue support vehicle; FY2025 funds are for 3 vehicles	MRN170004	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Marin	GGBHTD	San Rafael Transit Center Relocation	San Rafael: San Rafael Transit Center: The SMART extension will bisect the existing transit center, eliminate Platform C, reduce the facility's transit capacity, and affect the long-term efficiency and operability of the facility. Phase 1 of the project will analyze three previously identified potential long-term alternatives and a no-build alternative, include an option to assess the possibility of additional alternatives, conduct community outreach and environmental clearance, and provide preliminary engineering design. When SMART commences service on their Initial Operating Segment in 2017, the SRTC will be operating in an interim condition which will limit the fiscal and operational efficiency of transit services. Phase 2 will complete final design and construction of the permanent San Rafael Transit Center. 21-T-01-002	MRN170013	21-T01-002	Exempt (40 CFR 93.127) - Bus terminals and transfer points	Not Modeled
Marin	Various	GL: Marin County - TOS-Mobility	Marin County: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and 40 CFR Part 93.127 Table 3 categories - Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Lighting improvements, Emergency truck pullovers, Interchange reconfiguration projects Includes ramp metering and TOS elements on various locations along 101 in Marin County	MRN170018	21-T06-048	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Marin	Marin County	Marin City Pedestrian Crossing Improvements	Marin County: In the Marin City area of unincorporated Marin County: Improve pedestrian accessibility and safety with new curb ramps. The new curb ramps are at the following locations- 3 at Terners Drive @ Driveway entrances to multi-family housing closest to Donahue, 4 at Terners Drive @ Terrace Way, 4 at Terners Drive @ Terrace Drive, 2 at Flemings Court @ Terrace Drive, 2 at Donahue Street @ Sherwood Drive, and 4 at Bay Vista Circle @ Donahue Street & Sherwoood Drive	MRN190015	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Marin	MCTD	MCTD - Bus Stop Improvements	MCTD: Systemwide: Improve accessibility by installing wheelchair landing pads and other passenger amenities at multiple bus stop locations in the county.	MRN210002	21-T10-093	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Marin	MTC	Regional Planning Activities and PPM - Marin	Marin County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on MRN170001	MRN210003	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Marin	MCTD	MCTD: Replace Demand Response Vans	MCTD: Demand response vans: Replace 4 vehicles that are beyond their useful life	MRN210007	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Marin	MCTD	MCTD ZEB Charging Infrastructure	MCTD: At the 3010/3020 Kerner Parking Facility: Prepare the site for ZEB charging infrastructure	MRN210201	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Marin	San Rafael	San Rafael 2nd and 4th Street Intersection Improve	This project improves access to the non-conventional multi-legged intersection at the City's westerly gateway where two major arterial roadways meet a frontage road and residential streets. The intersection is difficult to navigate by motorists, bicyclists, and pedestrians. This project reconfigures the intersection and improves the traffic signal to extend the Cross Marin Bikeway while improving access and safety for pedestrians. These intersection enhancements are complementary to the Third Street improvement project, which includes a Class IV cycletrack along Second Street that is currently under construction. Project includes Demolition, concrete work including sidewalks, curb ramps, and realigning curbs, traffic signal modifications/upgrades, street safety lighting, pavement work, landscape, signage, striping, bicycle improvements, and transit stop	MRN230201	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Marin	MCTD	MCTD - Transit Corridor Improvements	This project will evaluate and make improvements to high ridership transit corridors in Marin County. Proposed improvements include enhanced passenger information, upgraded amenities at bus stops and transit priority improvements to make transit service faster, more reliable, and more accessible to riders. Target corridors are: - 4th Street, San Rafael - Lincoln Ave, San Rafael - South Novato Blvd, Novato	MRN230202	21-T10-093	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Marin	Corte Madera	Paradise Drive Complete Streets	The project includes multimodal enhancements with a new 8' wide shared-use path for pedestrians and bicyclists along the 1700' corridor. Additionally, the project will include new and improved crosswalk, including lighted signs or a Rectangular Rapid Flashing Beacon, near the Upland Circle intersection. To accommodate the new bike and pedestrian improvements and to reduce high vehicular travel speeds along the corridor, the road will be resurfaced and vehicle travel lanes will be narrowed down to 10 feet with a striped shoulder. New signs and striping will be added for additional safety and traffic calming purposes. Paved on-street parking will be included for residents and visitors of Ring Mountain Open Space. The road will be raised to protect against flooding and future sea level rise.	MRN230204	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Marin	San Rafael	Canal Neighborhood Active Transportation Enhanceme	Pedestrian enhancements, bicycle boulevard treatments, and transit stop upgrades on 20 streets in the Canal neighborhood	MRN230207	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Marin	San Rafael	San Rafael Canal Crossing	Non-motorized bridge between Canal Street in San Rafael's Canal neighborhood and Third Street in San Rafael.	MRN230208	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Marin	MCTD	Fixed Route EV Charging and Maintenance Facility	MCTD: San Rafael: Construct new electric bus facility	MRN230209	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction of new bus or rail storage/maintenance	Not Modeled
Marin	Marin County	E Sir Francis Drake Bikeway Gap Closure	Corridor study and preliminary engineering for Bikeway gap closure along East Sir Francis Drake Boulevard between Remillard Park in Larkspur and I-580 overcrossing	MRN230210	21-T07-058	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Marin	MCTD	MCTD- Onboard Technology	Marin Transit will replace on board AVL and fare collection equipment.	MRN230211	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Marin	Corte Madera	Central Marin Regional Pathway Gap Closure	Construction of Class I pathway, 2-way protected Class IV cycle track, and enhanced pedestrian/bike crossings at two uncontrolled crossings, including at a Highway 101 on/off ramp.	MRN230212	21-T12-128	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Marin	GGBHTD	Golden Gate Bridge Seismic Retrofit, Ph: 1-3A	San Francisco /Marin Counties: Golden Gate Bridge This project would retrofit the Golden Gate Bridge to withstand a maximum credible earthquake (magnitude Richter of 8.3) occurring on the nearby San Andreas or Hayward Faults. Seismic retrofit construction has been divided into three phases: Phase 1 includes implementation of seismic retrofit measures to the north approach viaduct and implementation of environmental mitigation measures. Phase 2 includes implementation of seismic retrofit measures to the south viaduct, south anchorage housing, Fort Point Arch, pylons S1 and S2, and utility modifications throughout the south approach structures. Phase 3 includes implementation of seismic retrofit measures to the suspension bridge, south pier and fender, north pier, north anchorage, and pylon N1. Earmarks: 05 Appropriation (5M$) HPP #429 ($8.8M) and HBB SAFETEA earmark ($50M) partial, last three years in MRN050018.	MRN970016	21-T01-005	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Napa	NVTA	NVTA: Replace Rolling Stock	NVTA: Fleetwide: Replace rolling stock for fixed-route, paratransit, and community shuttle fleet.	NAP090005	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Napa	NVTA	NVTA Equipment Replacement and Upgrades	NVTA: Napa Vine service area: Replacement and upgrades to transit equipment and existing facilities	NAP090008	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of office, shop, and operating equipment for	Not Modeled
Napa	Napa	SR-29 Bicycle and Pedestrian Undercrossing	Construct a Class 1, ADA-compliant, paved multi-use path under Highway 29 on the north side of Napa Creek within City of Napa limits. Project will include site work, paving, construction of earth-retaining walls, construction of fences, and planting.	NAP130004	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Napa	NVTA	Napa Valley Vine Trail Calistoga-St. Helena Seg.	In Napa County: Design and construction of the Calistoga-St. Helena Napa Valley Vine Trail Segment, multi-use trail from Calistoga to St. Helena.	NAP150003	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Napa	Saint Helena	Main Street St. Helena Pedestrian Improvements	Saint Helena: Along Main Street (SR29) from Adams Street to Pine Street: Replace and upgrade pedestrian facilities. The project will include the removal and replacement of approximately 1,100 linear feet of sidewalk, curb ramps, construct crosswalk enhancements, tree removal and replacement, landscape irrigation, sewer and water lateral replacement, and installation of street light electrical.	NAP170005	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Napa	American Canyon	Green Island Road Class I	American Canyon: Green Island Rd from Paoli Loop to Commerce Blvd: Construct approximately 4,200 LF of new Class 1 multi-use trail to accommodate cyclists and pedestrians, and to encourage non-vehicular modes of transportation, and as required by local, regional and State Complete Streets policies. Improvements include sidewalks and Class I bike facilities such as the Napa Valley Vine Trail. The City of American Canyon enjoys an ideal location among three major goods movement corridors: Highways 29, 37, and 80 near three international airports and Union Pacific Railroad. Within the City, the Green Island Industrial District (GRID) is a regional agricultural employment center (with 30+/- logistics centers and over 1,227 employees) that provides industrial space for wineries and international farm to table agricultural distributors. These industrial users include food service/processing facilities such as Biagi Brothers (finished agricultural product trucking), Sutter Home Wines (wine), Barry Callebaut (chocolate), Mezzetta Foods (vegetables), and Wallaby Yogurt (dairy products). As a whole, the Project will benefit the City and Napa Valley, which is a critical economic engine for the region. The Project will also serve to connect high-density housing in the American Canyon PDA to economic opportunities in the Green Island Industrial Area. The Project will serve to improve traffic circulation, benefit the City's commercial/industrial users, and foster the economic vitality of the City. The Project will also enhance Napa PCAs by supporting local agricultural uses.	NAP170006	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Napa	Napa	Silverado Trail Five-Way Intersection Improvements	City of Napa: At the intersection of Silverado Trail, Third St, Coombsville Rd, and East Ave: Construct roundabout to improve operations that will result in increased safety, reduced driver delay, reduced congestion, and improved overall level of service. Additionally, the purpose of this project is to improve the safety and accessibility for all users by including bicycle facilities and pedestrian facilities that meet ADA requirements. Caltrans will be the implementing agency for the project.	NAP170009	21-T07-056	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Napa	NVTA	Imola Park n Ride and Express Bus Stop Improvement	Napa County: At the Caltrans owned and operated park and ride at SR 29 and Imola Avenue: Make improvements including in-line passenger loading and alighting at the Imola Ave on/off ramps, improved pedestrian facilities that connect the ramps directly to the park and ride, and safety improvements, such as improved lighting and signal improvements. The facility improvements will also include long-term bicycle parking in the park and ride lot. These facility improvements are specifically designed to improve frequency, reduce running times and improve accessibility for the two highly productive ridership bus routes: the Route 29 Express to the El Cerrito Del Norte BART station and the Route 11X to the Vallejo Ferry Terminal. Currently, the Routes depart from the Soscol Gateway Transit Center in the center of Napa, a significant distance east of the SR29 Corridor. Relocating the stop to the Imola Park and Ride will reduce running time for each route by 20 minutes since the bus routes will not need to divert across downtown Napa and return back to the highway.	NAP190006	21-T12-118	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Napa	MTC	Napa Valley Forward: Safety and Operational Imp.	Napa: SR-29 Up Valley Corridor: Implement safety and operational improvements for a multimodal corridor. Provide operational and safety improvements at 3 intersections along the up valley SR 29 corridor at the intersections of Rutherford/SR 29 and Oakville Cross Road/SR 29. The improvements will relieve the significant traffic congestion along the corridor prevalent during peak commute periods and during the weekends. The intersection improvements will improve safety and corridor operations and also greatly improve bicycle and pedestrian access. The purpose of this project is to enhance multimodal safety, comfort and access and to efficiently manage traffic congestion for both residents, employees, and visitors in Napa Valley. Design will include multimodal assessment to determine level and quality-of-service for vehicle, bicycling, walking and transit modes. The corridor serves to two Communities of Concern in Napa County and the corridor is served by regional transit Routes 10 and 10X.	NAP190007	21-T07-056	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Napa	MTC	Regional Planning Activities and PPM - Napa	Napa County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on NAP170001	NAP210001	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Napa	Napa Valley Vine Trail	Napa Valley Vine Trail - Yountville to St Helena	Napa County: Parallel to Highway 29 from Madison Street in Yountville to Pratt Avenue in St. Helena: Design and construct a 10 mile long, Class 1 multiuse path within the unincorporated County and City of St. Helena. The Napa Valley Vine Trail alignment for the unincorporated segment would start at the intersection of Highway 29 at Madison Street and generally follow the alignment of the Napa Valley Wine Train tracks and the Caltrans Highway 29 right-of-way to the St. Helena City Limit. In St. Helena, the alignment would be along Highway 29, Mitchell, Oak, Adams, the Napa Valley Wine Train (NVWT), and Pratt Avenue. The project would close a gap in the NVVT between the 12.5-mile segment south of Yountville and the nine-mile segment north of Pratt Avenue.	NAP230201	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Napa	NVTA	SR-29 American Canyon Operational & Multimodal Imp	Complete the environmental document for the SR 29 operational and multimodal improvements through American Canyon, including intersection improvements and complete streets facilities.	NAP230202	21-T01-001	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Napa	Napa	Complete Streets Improvement Plan (Jefferson SS4A)	Develop a Complete Streets Improvement Plan for the Jefferson Street Corridor. Plan will identify opportunities for multimodal (bike/ped/auto/transit) safety and connectivity improvements along the Jefferson Street corridor, which is identified as a part of the City of Napa's High-Injury Network. Project funding is all for planning use.	NAP250201	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Napa	Napa	Napa Planning and Demonstration Activities (SS4A)	SS4A Planning and Demonstration Activities. Develop a Complete Streets Improvement Plan for Redwood Road. Plan will identify opportunities for multimodal safety and connectivity improvements along Redwood Road, which is identified as a part of the City of Napa's High-Injury Network. Conduct emergency response time technology demonstration activities and enforcement technology activities. Project funding is for planning and demonstration activities only.	NAP250202	21-T08-060	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	BART	BART-Elevator Renovation Program	BART: 61 locations system-wide: Renovate or rehabilitate elevators	ALA190014	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Regional/Multi-County	BART	BART Train Control Renovation	BART: Systemwide: Rehabilitate existing core system train control equipment that is over 30 years old and is near the end of its useful life. The funds requested for fiscal year 2005 will be used to replace speed command functions of the existing train control system.	BRT030004	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Regional/Multi-County	BART	BART: Traction Power System Renovation	BART: Systemwide: Replace obsolete elements and subsystems of the traction power system to maintain and improve reliability and safety. Additional components of this project for fiscal years 2006-2008 include:1. Purchase & install 9 Sub Stations to replace Substations that are currently approaching the end of their useful life. 2. Install 4.5 Route Miles of 2 circuits of 34.5 kV Cables. 3. Purchase & install 20 more Negative Grounding Devices. 4. Purchase & install 150 more Multi-Purpose Relays, which will be installed on DC Circuit Breakers that will be replaced in more than 5 years. These relays have a number of features that will significantly reduce the severity & damage to the substations that have electrical faults. This will significantly reduce the time for & the cost of repairs to the aging equipment & thus enable reliable train service to be provided until all the Substations are replaced. 5. Replace / rehabilitate other parts as necessary on existing substations to enable them to remain in reliable service until the Substations can be replaced.	BRT030005	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Regional/Multi-County	BART	BART: Rail, Way and Structures Program	BART: Systemwide: Replace worn out mainline rail and make other timely reinvestments in way including, but not limited, to civil structures and all track subsystems.	BRT97100B	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
Regional/Multi-County	MTC	Bay Area Commuter Benefits Program	San Francisco Bay Area: Region wide: Implement the Bay Area Commuter Benefits Program. Senate Bill 1128, codified in California Government Code 65081, authorizes the Bay Area Air Quality Management District and the Metropolitan Transportation Commission to jointly continue the Bay Area Commuter Benefits Program. Employers subject to the program are required by law to register via the program website, select a commuter benefit, and offer the benefit to their employees.	MTC050001	21-EN09-132	Exempt (40 CFR 93.126) - Air Quality - Continuation of ride-sharing and van-pooling promotion	Not Modeled
Regional/Multi-County	MTC	Regional Streets and Roads Program	SF Bay Area: Regionwide: Regional Streets and Roads Program including providing assistance to Bay Area agencies to implement and maintain computerized pavement management system (PMS), implementing PTAP (Pavement Technical assistance program), updating regional Needs etc.	REG090039	21-T01-003	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Regional/Multi-County	WETA	WETA: Ferry Channel and Berth Dredging	WETA: Various service areas: Regularly scheduled dredging to remove silt build-up that would otherwise keep ferries from operating from Vallejo ferry basin, Harbor Bay Channel and other WETA service areas.	REG090054	21-T11-095	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
Regional/Multi-County	WETA	WETA: Ferry Major Component Rehab/Replacement	WETA: Fleetwide: Rehabilitate and/or replacement major ferry components including shafts, propellers, navigation systems, onboard monitoring and alarm systems, interior components, boarding apparatus, hull, lifesaving equipment and other components. Ferry vessels are required to undergo periodic haul-out and rehabilitation work to remain in working order over their 25-year life.	REG090057	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
Regional/Multi-County	WETA	WETA: Fixed Guideway Connectors	WETA: This project includes rehabilitating and replacing the floats and gangway systems that allow the passengers to get from the vessels to the terminals (extension of the fixed guideway in the marine environment). This project will also replace existing passenger loading facilities (ramps), floating barges, piers and hydraulic systems.	REG090067	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Regional/Multi-County	ACE	ACE Positive Train Control	ACE: System-wide: PTC is an advanced train control system, utilizing sensors on trains, switches, tracks and signalized crossings, to allow for automated collision prevention, improved manual accident prevention, and improved headways.	REG110044	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Regional/Multi-County	MTC	Toll Bridge Maintenance	Region-wide: Seven state-owned toll bridges: routine maintenance of bridge facilities	REG130001	21-T01-005	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Regional/Multi-County	MTC	Toll Bridge Rehabilitation Program	Bay Area: On 7 state-owned toll bridges: Rehabilitation program	REG130002	21-T01-005	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Regional/Multi-County	MTC	Regional Communications Infrastructure Upgrade	This project encompasses (1) highway operations equipment and the associated communications infrastructure (2) critical freeway and incident management functions and (3) transportation management center resources needed to actively operate and maintain both equipment and all these critical freeway and incident management functions. The program consists of a variety of activities, including the developing a robust and reliable regional communications network throughout the region improving access to comprehensive and accurate asset inventory information, evaluation of the effectiveness of existing hardware and systems, supporting proactive equipment life cycle planning, and enhancing communications connectivity along the 880 corridor.	REG170002	21-T07-053	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Regional/Multi-County	MTC	511 Carpool and Vanpool Programs	SF Bay Area: Regionwide: Operate Carpool and Vanpool Programs [formerly known as '511 Regional Rideshare Program']. Earlier funding is included under REG090042. Toll credits applied in lieu of match non-federal funds are non-participating	REG170003	21-EN09-132	Exempt (40 CFR 93.126) - Air Quality - Continuation of ride-sharing and van-pooling promotion	Not Modeled
Regional/Multi-County	MTC	Climate Initiatives Education and Outreach	Bay Area: Regionwide: Program designed to reduce greenhouse gas emissions and vehicle miles traveled through education and encouragement programs Program elements include: Bay Area Bike Mobile, the ECO2School program, the Family Biking Workshops program, and Bike to Work Day.	REG170006	21-EN09-132	Exempt (40 CFR 93.126) - Other - Grants for training and research programs	Not Modeled

Regional/Multi-County	MTC	511 Next Gen	SF Bay Area: Regionwide: The 511 program offers free multi-modal traveler information services via multiple dissemination platforms, including the federally dedicated 511 number, on the web and mobile devices at 511.org, and on regional information displays and electronic and wayfinding signage. The program also serves as the primary source for travelers and media during major disruptions and regional emergencies. In addition to supporting numerous MTC and partner initiatives, the program coordinates with many agencies and businesses for transportation information during regional events. The system aims to benefit travelers and to support effective management of the transportation system. The program intends to evolve with changes in technology and customer expectations, while maintaining information accuracy and reliability. Given the public's increasing reliance on private sector services for traveler information, 511 will focus on its strength as a data provider and leverage relationships with private sector traveler information providers in order to increase their dissemination of 511 traffic and transit data. Future program plans include reduction of real-time and trip planning features on the 511 phone and on a re-designed 511.org. Other Federal Funds are Work Zone Data Exchange (WZDx) Demonstration Discretionary Grant	REG170013	21-T07-050	Exempt (40 CFR 93.126) - Other - Directional and informational signs	Not Modeled
Regional/Multi-County	MTC	Regional Planning - PDA Implementation	SF Bay Area: Regionwide: : Planning Assistance to support transportation investments and improve their performance in priority development areas. The goal is to fund comprehensive planning and technical assistance in Priority Development Areas that will result in intensified land uses around public transit hubs and bus and rail corridors in the region.	REG170016	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Regional/Multi-County	MTC	Clipper 2.0 Fare Payment System	SF Bay Area: Regionwide: The Clipper card provides seamless use of public transit across the Bay Area's roughly two dozen transit systems, thereby eliminating a key barrier for new riders of public transit and making fare payment far more convenient for riders. In addition to standard fares, Clipper can be used by seniors, youth, disabled and certain college student riders for discounted transit rates. Launched ten years ago as one of the first smart card transit payment systems in the United States, Clipper is now used by close to 800,000 transit riders a day across all of the region's transit systems and is starting to show its age. The current software design precludes customers from adding value to their cards in real time via a mobile app and fare adjustments are time consuming and costly. Age also brings with it more frequent system failures and the need to replace equipment, yet many Clipper components are now obsolete. To keep pace with the Bay Area's growing reliance upon public transit, it's clear that it's time for an upgrade to Clipper 2.0.	REG170022	21-T07-057	Exempt (40 CFR 93.126) - Mass Transit - Purchase of office, shop, and operating equipment for	Not Modeled
Regional/Multi-County	MTC	TCP Financing Repayment Obligations	SF Bay Area: Regionwide: Repayment of principal balance and interest costs associated with securitization of future FTA formula fund apportionments. Principal balance is approximately $1B, with interest cost in the $300M-$500M range, to be paid back through FY35.	REG170023	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Regional/Multi-County	MTC	Regional Planning Activities and PPM - MTC	Regional: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding programmed on REG170001	REG210001	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Regional/Multi-County	MTC	Priority Conservation Area Grant Implementation	Regionwide: Administration of the Priority Conservation Area (PCA) grant program, which funds the planning, design, and implementation of projects that improve access to priority habitats, open spaces, and recreational opportunities. Toll credits will be used in lieu of match for STP funds.	REG210201	(blank)	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Regional/Multi-County	Caltrain	Caltrain Mini-High Platform Improvements	Caltrain: Systemwide: Install mini-high platforms at 13 stations to improve ADA Access and reduce dwell times at stations. Work will include installation of the precast platforms and modifications as needed to the existing infrastructure as needed to accommodate the installation. Grounding and bonding will be required at all of the stations within the areas that will be electrified. Upgraded stations include: Bayshore, Burlingame, Hayward Park, Belmont, California Avenue, San Antonio, Lawrence, Tamien, Capitol, Blossom Hill, Morgan Hill, San Martin, Gilroy	REG210202	17-10-0026	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Regional/Multi-County	MTC	Bay Trail Planning and Technical Assistance	SF Bay Area: Regionwide: Bay Trail Equity Strategy, Design Guidelines, Strategic Plan, Data Strategy, Needs Assessment/Ops and Maintenance Plan, and Technical Assistance. RTP ID is 21-T08-060. Toll credits will be used in lieu of match.	REG230201	(blank)	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	Regional Mapping and Wayfinding	SF Bay Area: Regionwide: The goal of the Regional Mapping and Wayfinding Project is to design and deploy a fully harmonized suite of maps, signs and transit information in all Bay Area transit locations — from individual bus stops to major hubs like the Salesforce Transit Center, the Eastridge Transit Center or the El Cerrito Del Norte BART station — and to provide practical, predictable guidance to the walkable destinations, local shuttles and the like that extend from these transit stops.	REG230202	21-T03-009	Exempt (40 CFR 93.126) - Mass Transit - Construction of small passenger shelters and information	Not Modeled

Regional/Multi-County	MTC	Regional ITS Architecture	The Bay Area Regional ITS Architecture (RITSA) is the blueprint for Intelligent Transportation Systems (ITS) project coordination and integration in the San Francisco Bay Area. The Bay Area ITS Architecture is available online at https://itsbayarea.mtc.ca.gov. It is periodically upgraded and maintained by the Metropolitan Transportation Commission (MTC) on behalf of region's stakeholders. The purpose of the Architecture is to accurately represent the region's existing and future use of information, technology, and automated systems to improve safety and efficiency for travelers and the agencies providing transportation services across all modes. The system also maintains inventory of mobility projects and services that benefit travelers in the region. Bay Area RITSA follows the national Architecture Reference for Cooperative and Intelligent Transportation (ARC-IT) framework and is maintained to comply with the latest ARC-IT version. Changes to the system is made based on Bay Area stakeholders' input. Some other smaller updates were also addressed at that time. The Bay Area RITSA facilitates ITS planning and aids in coordinated ITS project development, procurement, and delivery. The Architecture website provides access to comprehensive information about the ITS in the region, including project-specific data. Agencies in the Bay Area that implement ITS projects using Federal transportation funds are required to be consistent with the Bay Area ITS Architecture (pursuant to 23 CFR 940.9 and 940.11). It provides all the components required by the FHWA Final Rule and FTA Policy for regional ITS architectures.	REG230203	(blank)	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	Regional Vision Zero/Safety Prog Coord-Outreach	Support regional work by coordinating Vision Zero workshops and peer exchanges and develop a data-driven outreach campaign to help change traffic safety culture in the region. Workshops would bring outside knowledge to a forum to share best practices with our regional partners and bring up the level of knowledge of best practices throughout the region. Peer Exchanges would provide the opportunity for our regional leaders to share their knowledge, experiences, and successes with regional partners. Develop a data-driven outreach campaign which would use the work that went into developing our Regional Vision Zero Action Plan to identify a key issue that is affecting our region and develop an effective outreach campaign to address that issue.	REG230205	21-T09-061	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	Active Transportation Technical Assistance	SF Bay Area: Regionwide: Provide technical assistance to local agencies for active transportation policies and projects to spur implementation of Complete Streets Policy and the AT Network, while securing additional ATP funding. TA support includes: scoping projects for grant applications, writing and reviewing grant applications, complete Streets Policy implementation, designing All Ages and Abilities facilities, preparing active transportation projects for construction. Toll credits will be used in lieu of match.	REG230206	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	BART	BART Variable Parking Pricing	Variable Parking Pricing will better manage parking demand and deliver vehicle miles traveled (VMT) reduction, air quality improvements, and greenhouse gas (GHG) reduction benefits. Applied correctly when facilities are full, parking price increases encourage use of alternative (e.g. non-automobile) modes of access to BART. Parking is then efficiently used only by those who most need it. The current parking pricing software only supports one parking price per station, preventing BART from lowering or raising prices in response to temporal (time of day, day of week, or seasonal) variations in demand. New software will allow BART to maximize ridership by implementing these price variations and provide the ability to extend parking pricing to evenings and weekends.	REG230207	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Regional/Multi-County	MTC	Incident Management Program	SF Bay Area: Regionwide: The purpose of the program is to deploy projects that manage congestion by preventing and/or addressing incidents that occur along Bay Area corridors and arterials. The Incident Management program also utilizes operational and management tools, including advanced transportation management technologies and systems, to enhance mobility and safety.	REG230208	21-T07-053	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Regional/Multi-County	BART	Link21 - Phase 1: Program Development	The BART transbay tube connecting San Francisco and the East Bay reached its operational capacity before the 2020 pandemic, and requires periodic renovation. The nine-county Bay Area is the center of a megaregion, from Monterey County to the northern San Joaquin Valley to Placer County northeast of Sacramento. This 21-county megaregion supports the fifth largest economy in the world, and is increasingly dependent on its rail network, including the BART transbay crossing. BART and its rail partners are engaged in planning for a new transbay rail crossing within the context of the mega-regional rail network. The project is currently in Planning phase.	REG250201	21-T11-112	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	Caltrain	Caltrain: Signal/Communication Rehab. & Upgrades	Caltrain: Systemwide: The signal and communications rehabilitation and upgrades program includes a wide range of work to maintain Caltrain?s existing signal and communications systems in a state of good repair. Signal system rehabilitation and replacement includes: signal control and associated software control programs wayside signals signal wires, conduits, pull boxes signal support structures signal house structures and signal house components crossing mechanisms, including arms, lights, signs, foundations, auditory warning devices switch machines various wayside detectors to safeguard the rail infrastructure and any other necessary components for the signal system to function correctly. Communications rehabilitation and replacement includes existing systems such as: modems communications land lines, including fiber optic cables land line interfaces antennas switches radios software and other necessary communications related hardware. The modification of communications equipment may occur along the Caltrain corridor, at existing base stations located at surrounding mountain tops and the Central Administrative Office, on train consists, and maintenance vehicles, as well as other stationary equipment located along the Caltrain right-of-way.	SM-050041	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled

Regional/Multi-County	Caltrans	GL: Highway Safety Improvement Program	GL: Safety Imprv - Highway Safety Improvement Program: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Truck climbing lanes outside the urbanized area, Lighting improvements, Emergency truck pullovers.	VAR170002	21-T01-007	Exempt (40 CFR 93.126) - Safety - Highway Safety Improvement Program implementation	Not Modeled
Regional/Multi-County	Caltrans	GL: Pavement Resurfacing/Rehab SHS - Highway Maint	GL: Pavement Resurf/Rehab State Highway System - Highway Maintenance. Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Pavement resurfacing and/or rehabilitation.	VAR170004	21-T01-006	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Regional/Multi-County	Caltrans	GL: Safety Improvements - SHOPP Mobility Program	SF Bay Area: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Truck climbing lanes outside the urbanized area, Lighting improvements, Emergency truck pullovers	VAR170005	21-T01-006	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Regional/Multi-County	Caltrans	GL: Pavement Resurf./Rehab - SHOPP Roadway Presv.	Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 categories - Pavement resurfacing and/or rehabilitation, Emergency relief (23 U.S.C. 125), Widening narrow pavements or reconstructing bridges (no additional travel lanes)	VAR170006	21-T01-006	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Regional/Multi-County	Caltrans	GL: Safety Imprv. - SHOPP Collision Reduction	Regionwide: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Truck climbing lanes outside the urbanized area, Lighting improvements, Emergency truck pullovers	VAR170007	21-T01-007	Exempt (40 CFR 93.126) - Safety - Guardrails, median barriers, crash cushions	Not Modeled
Regional/Multi-County	Caltrans	GL: Emergency Repair - SHOPP Emergency Response	Regionwide: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 categories - Repair damage caused by natural disasters, civil unrest, or terrorist acts. This applies to damages that do not qualify for Federal Emergency Relief funds or to damages that qualify for federal Emergency Relief funds but extend beyond the Federally declared disaster period	VAR170008	21-T01-006	Exempt (40 CFR 93.126) - Other - Repair of damage caused by natural disasters, civil unrest, or	Not Modeled
Regional/Multi-County	Caltrans	GL: Safety Improvements - SHOPP Mandates	Regionwide: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Truck climbing lanes outside the urbanized area, Lighting improvements, Emergency truck pullovers	VAR170009	21-T01-006	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Regional/Multi-County	Caltrans	GL: Bridge Rehab and Reconstruction - SHOPP	Regionwide: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 categories - Widening narrow pavements or reconstructing bridges (no additional travel lanes).	VAR170010	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Regional/Multi-County	Caltrans	GL: Shoulder Imprv - SHOPP Roadside Preservation	Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 categories - Fencing,Safety roadside rest areas	VAR170011	21-T01-006	Exempt (40 CFR 93.126) - Other - Plantings, landscaping, etc	Not Modeled
Regional/Multi-County	Caltrans	GL: Bridge Rehab/Recon. - Local Hwy Bridge Program	GL: Local Bridge Rehab/Recon. - Local Highway Bridge Program(HBP) or Highway Bridge Replacement and Rehabilitation (HBRR) Projects. Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 categories - Widening narrow pavements or reconstructing bridges (no additional travel lanes).	VAR170012	21-T01-004	Exempt (40 CFR 93.126) - Safety - Widening narrow pavements or reconstructing bridges (no	Not Modeled
Regional/Multi-County	Caltrans	GL: Railroad-Highway Crossing	GL: Railroad/Highway Crossings. Projects are consistent with 40 CFR 93.126 Exempt Tables 2 categories - Railroad/highway crossing	VAR170017	21-T01-006	Exempt (40 CFR 93.126) - Safety - Railroad/highway crossing	Not Modeled
Regional/Multi-County	MTC	Bike Share Capital Program	SF Bay Area: Regionwide: Coordinate planning, outreach, policy and information sharing for bikeshare and micromobility programs. Fremont, Richmond, and Marin and Sonoma Counties, along the SMART Corridor: Various Locations: Implement bike sharing. Richmond will receive $1,024,000, Fremont will receive $659,000 and SCTA/TAM will receive $826,000. MTC will receive $75,000 to administer the grant.	VAR170024	21-EN09-132	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Regional/Multi-County	MTC	GL: Lifeline Transportation Program Cycle 5 and 6	SF Bay Area: Region-wide: 5307 Lifeline set-aside from FY17 and FY18 Large and Small UA. Various 5307 Lifeline projects in large and small urbanized areas. Project is consistent with 40 CFR Part 93.126 Exempt Table 2	VAR170025	21-T01-001	Exempt (40 CFR 93.127) - Bus terminals and transfer points	Not Modeled
Regional/Multi-County	Caltrans	GL: Pvmt Resurf/Rehab State Hwy Sys - SHOPP Minor	GL: Pavement Resurf/Rehab State Hwy System - SHOPP Minor. Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Railroad/highway crossing, Safer non-Federal-aid system roads, Shoulder improvements, traffic control devices and operating assistance other than signalization projects, Intersection signalization projects at individual intersections, Pavement marking demonstration, Truck climbing lanes outside the urbanized area, Lighting improvements, Emergency truck pullovers, Pavement resurfacing and/or rehabilitation, Emergency relief (23 U.S.C. 125), Widening narrow pavements or reconstructing bridges (no additional travel lanes)	VAR190001	21-T01-006	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Regional/Multi-County	MTC	GL: Transit Operating Assistance	GL - SF Bay Area: Region-wide: Transit Operating Assistance	VAR190006	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Regional/Multi-County	MTC	GL: Transit Preventive Maintenance	GL - SF Bay Area: Region-wide: Transit Preventive Maintenance	VAR190007	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
Regional/Multi-County	Caltrans	GL: Recreational Trails Program	Grouped Listing: Regionwide: Projects with US Recreational Grant Program Funds. Projects are consistent with 40 CFR Part 93.126, 127, 128, Exempt Tables 2 & 3	VAR190009	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Regional/Multi-County	MTC	GL: FTA 5311 Rural Area FY21-FY24	GL: FTA Section 5311 Rural Area Program, Non-ITS portion. Projects include capital and operating assistance. Projects consistent with 40 CFR Part 93.126 Exempt Table 2	VAR210001	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Regional/Multi-County	Caltrans	GL: Fed Lands Highways Pgm-Tribal Transport Pgm	SF Bay Area: Various Locations: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 categories - Safer non-Federal-aid system roads, Shoulder improvements, Pavement resurfacing and/or rehabilitation, Bicycle and Pedestrian Facilities	VAR210002	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled

Regional/Multi-County	MTC	GL: Transit ADA Operating Support	SF Bay Area: Region-wide: Transit ADA operating support	VAR210003	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Regional/Multi-County	MTC	Technical Assistance Mobility Hub Pilot Program	SF Bay Area: Regionwide: Mobility hubs provide highly visible intermodal connections that encourage transit trips and first/last mile biking and connections, especially when co-located with other	VAR210006	21-EN09-132	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	Bay Bridge Forward Preliminary Engineering	SF Bay Area: Various bridge corridors and corridor approaches: Conduct preliminary engineering and planning studies to advance Bay Bridge Forward projects into delivery. Project include, but not limited to transit priority projects (near-term, Blue Ribbon accelerated actions, and mid-term improvements), high occupancy vehicle lane strategies and policies, integrated bridge corridor operations and dynamic transit routing, technology and operational improvements, active transportation, bike share, commuter parking, first and last mile solutions, and other multi-modal/demand management/pricing strategies.	VAR210007	21-T06-049	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	I-880 Optimized Corridor Operations	Alameda and Santa Clara Counties: Along the I-880 corridor: Implement near-term strategies to integrate and optimize corridor operations, including data sharing platform and system integration. The I-880 corridor serves an integral role in the Bay Area transportation network by connecting Alameda County and Santa Clara County/Silicon Valley. The goal of this project is to develop and implement strategies to integrate the various existing and planned ITS/operational infrastructure to improve the corridor operational performance. The existing ITS/operational infrastructure includes adaptive ramp metering, express lanes, incident management, and others. The project may also evaluate opportunities to integrate operations with key parallel arterials.	VAR210008	21-T06-049	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Regional/Multi-County	MTC	GL: FTA Section 5310 Program FY20 - FY23	SF Bay Area: Region-Wide: Enhanced Mobility for Seniors and Persons with Disabilities Program Lump Sum Listing. Project include Vehicle replacements, minor expansion & office equip. Consist with 40 CFR Part 93.126	VAR210201	17-10-0027	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Regional/Multi-County	Caltrans	GL: PROTECT Planning Studies	Bay Area: Various Location: Projects are consistent with 40 CFR Part 93.126 Exempt Tables 2 and Table 3 categories - Planning activities conducted pursuant to titles 23 and 49 U.S.C. Other State funds are PTA.	VAR230201	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Regional/Multi-County	Caltrain	Fencing for Caltrain Right of Way	The Fencing for Caltrain Right of Way project, implemented in phases, will install approximately 90.4 miles of winglets onto Caltrain fencing along the railroad Corridor as part of a series of safety improvement intended to increase safety, including suicide prevention. The Caltrain Corridor serves the counties of San Francisco, San Mateo, and Santa Clara.	VAR230202	21-T01-002	Exempt (40 CFR 93.126) - Safety - Fencing	Not Modeled
Regional/Multi-County	GGBHTD	GGBHTD ZEB Infrastructure	GGBHTD: In San Rafael: Design, Purchase and Installation of ZEB Infrastructure	VAR230203	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Regional/Multi-County	MTC	Mobility Hubs-Parking Management Planning and TA	The goal of the Mobility Hubs and Parking Management Planning programs are to assist jurisdictions, transit agencies and county transportation agencies in developing a hub plans or parking management plans. Jurisdictions, transit agencies and county transportation agencies are eligible to receive planning grants through a competitive process. MTC anticipates recommending grant awards to the Commission for approval in June 2023. In addition, for the Mobility Hubs and Parking Management capital projects, MTC will provide design and evaluation technical assistance to help project sponsors meet the objectives of the program.	VAR230204	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	Priority Production Area Pilot Program	SF Bay Area: Regionwide: Planning Assistance to support infrastructure investments, policies, or programs to improve the performance of Priority Production Areas, clusters of industrial businesses well-served by the region's goods movement network. The goal is to fund comprehensive planning and technical assistance in Priority Production Areas that will result in increased economic development investments and protection from competing land uses.	VAR230205	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	MTC	Transportation Electrification Planning Program	Given the increased urgency to reduce GHG emissions and advance the Plan Bay Area 2050 transportation electrification strategy, MTC developed a program that will invest in infrastructure and planning to accelerate electrification of the light-duty transportation sector. The Transportation Electrification Planning Program will focus on three main components: 1) A.Public Fleet Electrification Planning, 2) Local Transportation Electrification Action Planning and 3) Regional Program Planning.	VAR230206	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Regional/Multi-County	BART	Electric Vehicle Charging at BART Stations	Install roughly 200 Level-2 charging ports at four BART stations.	VAR230207	21-EN08-131	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Regional/Multi-County	MTC	GL: Bus Accelerated Infrastructure Delivery	The Bus Accelerated Infrastructure Delivery (BusAID) effort serves to fund the delivery of near-term (quick-build) transit priority projects in "hotspot" locations throughout the Bay Area. The intent is to maximize travel time savings and service	VAR230208	21-T10-093	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Regional/Multi-County	GGBHTD	GGBHTD - Zero Emissions Bus Replacement	Purchase of seven zero emission buses to replace existing diesel engine buses.	VAR230209	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled

San Francisco	SFMTA	SFMTA:Train Control & Trolley Signal Rehab/Replace	SFMTA: Systemwide: ATCS Wayside/Central Train Control & Rail/Bus Signal Systems Rehab/Replace Program includes but is not limited to (1) Final cutover of the new Advanced Train Control System (ATCS), remove the old signal system, and replace critical wayside equipment including station controllers, axle counters, and loop cables (2) Replace the UPS that provides power to the Central Control portion of the ATCS (3) Replace subway motor generators at Van Ness Station,	SF-050024	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
San Francisco	SFCTA	Yerba Buena Island (YBI) Ramp Improvements	San Francisco: Existing on and off ramps at the Yerba Buena Island (YBI) interchange at US I-80: Reconst ramps On the west side of the Island: Rehabilitate existing deficient bridges. Neither element is included as part of the current San Francisco-Oakland Bay Bridge (SFOBB) East Span Seismic Safety Project. Funds programmed after FY19 are for elements that do not change roadway capacity. $18M in Other Federal are RAISE funds	SF-070027	21-T01-004	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
San Francisco	SFMTA	Oakdale Caltrain Station	San Francisco: Oakdale near Palou: Planning, preliminary engineering, and environmental work for a new Caltrain commuter-rail station at Oakdale Avenue to accommodate transit needs of a newly developing Bayview/Waterfront/Hunters	SF-090011	21-T11-115	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
San Francisco	SFMTA	SFMTA: Paratransit Vehicle Replacements	SFMTA: Paratransit service across San Francisco: preserve service and replace 84 paratransit vehicles	SF-090035	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
San Francisco	WETA	WETA: Replace Ferry Vessels	WETA: All existing ferry vessels for WETA: Replace vessels when they reach the end of their useful life of 25 years	SF-110053	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
San Francisco	Port of SF	Cargo Way and Amador Street Improvements	In San Francisco: On Cargo Way from Jennings to 3rd Street and Amador Street from Illinois Street to 2,300 ft. east: design and construct a complete street project, including road resurfacing, separated bike lane on Cargo Way, expanded sidewalks, greening, and reduce stormwater run-off.	SF-170012	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
San Francisco	BART	Embarcadero Stn: New North-Side Platform Elevator	San Francisco: At the north end of the Embarcadero BART/Muni Station: Purchase and install a new vertical elevator. A glass enclosed cab and hoistway are envisioned to be used for visual transparency and an emergency stop will be provided at the Muni platform. This project meets the OBAG goal of Transit expansion, reliability and access improvements, is in a PDA, increases Core Capacity and is included in MTC's Bay Area Core Capacity Transit Study. $1,172,942 for this project is included in VAR170025 for Lifeline Cycle 6.	SF-170016	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of office, shop, and operating equipment for	Not Modeled
San Francisco	SFMTA	SFMTA: Motor Coach Mid-Life Overhaul	SFMTA: Existing Motor Coach and Trolley Coach Mid-life overhauls. SFMTA has started the Fleet Replacement program since 2013 and these vehicles have reached the midpoint of its life expectancy. A midlife overhaul program is critical to sustain the reliability and service availability of the vehicles. Taking the midlife overhaul opportunity, this allows SFMTA to keep the onboard electronic systems up-to-date. The general scope of work is to include the propulsion system, traction motors, onboard battery system, destination signs, flooring, seats, pneumatic system, electrical systems, interiors and	SF-170018	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
San Francisco	SFMTA	SFMTA: Rehab Historic Streetcars	SFMTA: Fleet of historic streetcars: Rehabilitate vehicles. SFMTA operates a fleet of Presidents' Conference Committee streetcars (PCC) and other vintage streetcars 21 hours per day, 365 days a year. The PCCs carries approximately 20,000	SF-170021	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
San Francisco	TIMMA	Treasure Island Ferry Terminal Landside Imprvmnts	San Francisco: On Treasure Island at the new Treasure Island Intermodal Terminal on Avenue of the Palms between Clipper Cove Way and California Ave: Construct land-side improvements including shelters and public restrooms.	SF-190006	21-T10-092	Exempt (40 CFR 93.126) - Mass Transit - Construction of small passenger shelters and information	Not Modeled
San Francisco	SFCTA	Yerba Buena Island Multi-Use Pathway	San Francisco: On Yerba Buena Island along Hillcrest Rd and Treasure Island Rd: Build new multi-use path connecting the Bay Bridge East Span Bike Landing on YBI to the future Bay Bridge Skyway on West Span and to the Ferry Terminal on	SF-210001	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Francisco	MTC	Regional Planning Activities and PPM - SF County	San Francisco County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on SF-170002	SF-210004	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
San Francisco	SFMTA	Central Embarcadero Safety Project	The Project expands on recent quick-build safety measures along The Embarcadero, between Bryant Street and Broadway, on the Vision Zero High Injury Network. It includes curb, utility, and other changes to extend and improve the waterside protected bikeway; shorten and improve crosswalks; and add real-time messaging/wayfinding for parking and special events.	SF-230201	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Francisco	SFMTA	29 Sunset Improvement Project	The San Francisco Municipal Transportation Agency (SFMTA) 29 Sunset Improvement Project aims to improve the performance (travel time and reliability) of and passenger experience (including improved safety for pedestrians accessing the bus) on the Muni 29 Sunset bus route such as optimization of stop locations; improvements to stops, such as expanded waiting areas and, in some cases, transit bulbs; and implementation of transit signal priority.	SF-230202	21-T10-068	Exempt (40 CFR 93.126) - Mass Transit - Construction of small passenger shelters and information	Not Modeled
San Francisco	Caltrain	San Francisco RailyardsTOC Implementation Strategy	The project will develop a Transit Oriented Communities Implementation Strategy (TOC Strategy) plan for the major mixed-use transit-oriented development at the 20-acre Caltrain 4th and King railyard. The project includes public engagement and neighborhood planning to develop strategies that reflect local priorities; assess how to create more housing by removing barriers to housing in surrounding neighborhoods; identify infrastructure needs required to enhance multimodal connectivity between the neighborhood and TOD, including bicycle and pedestrian access.	SF-230203	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled

San Francisco	SFMTA	SFMTA Facility Development -- Battery Electric Bus	San Francisco: ZEB Infrastructure Set-Aside SFMTA is preparing a RFP for an Environmental Consultant for CEQA and NEPA for its bus yards 949 Presidio Ave.-- Presidio Yard, 2301 Stockton St. -- Kirkland Yard, 1301 Cesar Chavez -- Islais Creek Yard. The $6,312,271 in funding will be used for planning, inreach and outreach, and preparation of CEQA and NEPA documents to prepare these yards for next steps for improvements, including installing infrastructure to operate BEBs to meet CARB's 2040 deadline.	SF-230204	21-EN08-131	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
San Francisco	SFMTA	Muni Forward Five-Minute Network Corridor Planning	The Five-Minute Network is part of the SFMTA's next generation of Muni Forward transit priority capital projects. The most intensive improvements will focus on the network of high-ridership corridors with capacity to support combined five-minute headways or better, that serve major regional destinations and transit hubs, referred to as a "Five-Minute Network." Improvements would also be made to routes that provide critical connections to the Five-Minute Network.	SF-230205	21-T10-068	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
San Francisco	SFMTA	Bayview Multimodal Community Corridor	The Bayview Community Multimodal Corridor project will improve pedestrian and bicycle safety and access by providing a comfortable multimodal route and supportive programs. The project includes 9 raised crosswalks, 3 raised intersections, over 0.5 mile of protected bikeway, 3 protected intersections, 7 bulbouts, 11 curb ramps, 125 feet of widened sidewalk, 13 speed humps/cushions, 2 transit boarding islands.	SF-230206	21-T02-008	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Francisco	SFMTA	Western Addition Safe Streets	The Western Addition Community Safe Streets Project (the Project) will improve traffic safety outcomes and increase connectivity in the Western Addition. The project will deliver core safety improvements identified in the Western Addition Community Based Transportation Plan (WA CBTP) and implement speed management strategies throughout the neighborhood to reduce crashes and help San Francisco achieve its Vision Zero goals of zero traffic deaths.	SF-230207	21-T02-008	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
San Francisco	Port of SF	POSF-MTC Parking Management Pilot	Purchase and installation 28 multi-space meters that would be managed and maintained by SFMTA. The project will reduce local congestion caused by drivers by searching for parking without the benefit of real-time meter occupancy information; reduce delays to transit caused by local congestion, improving transit reliability and increasing transit	SF-230208	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
San Francisco	SFMTA	Pay or Permit Parking Program Expansion	This project uses FHWA funds to purchase parking paystations to expand SFMTA's Pay or Permit Parking Program, which charges a fee to visitors to park on streets in residential neighborhoods to increase parking availability and reduce congestion.	SF-230209	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
San Francisco	SFMTA	Howard Streetscape Improvement Project	San Francisco: Implement safety improvements on Howard Street from 4th to 11th Streets, which is on San Francisco's Vision Zero High Injury Network. The project will remove a westbound vehicle lane, construct a two-way protected bikeway, upgraded bike and vehicle signals, bulb-outs and raised crosswalks, new midblock crosswalks, and improved curb management. Also included are public realm improvements such as landscaped medians, decorative pavement, cultural district signs and plaques, and additional streetlights.	SF-230210	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
San Francisco	SFMTA	Third Street Dynamic Traffic Signal Optimization	The Third Street Dynamic Traffic Signal Optimization Project seeks to improve and advance the SFMTA goals of safety and reliability, equity, access, and climate through the implementation of smart technology traffic signals. The technology includes a new traffic detection system and a demand based adaptive signal priority central traffic software. These technology solutions respond to real time needs of multimodal traffic flow to move the most people safely through the diverse Third Street corridor.	SF-230212	21-T10-068	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
San Francisco	SFMTA	SF Muni Rail, Way & Structures Program	SFMTA: Systemwide: Design and replacement of trackway, tunnel, and related systems serving the light rail and cable car lines as part of a regular replacement program and to mitigate excessive noise and vibration. The program seeks to rehabilitate and repair existing track work, including replacement and tamping of ties and ballast and installation of guardrail, enhance system safety and reliability, while reducing the need for excessive maintenance. This program is divided into 10 year segments, and work is ongoing on various phases of the program.	SF-95037B	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
San Francisco	SFMTA	SFMTA: Cable Car Vehicle Renovation Program	SFMTA: Cable car fleet: Overhaul and reconstruct the cable car fleet to maintain system reliability and productivity. Project is phased. Currently each car is unique and parts must be fabricated for each individual car. One goal of the renovation program is to start to standardize major vehicle components. Minor overhauls are scheduled every 15 years, major overhauls at 30-35 years and reconstruction at 60-70 years. At any one time, a total of four cars may be undergoing renovation. Reconstruction takes 18 months, major overhaul takes 9 months, and a minor overhaul takes 6 months.	SF-970073	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation of transit vehicles	Not Modeled
San Francisco	SFMTA	SFMTA Overhead Line Recon and Traction Power Prog	SFMTA: Systemwide: Design and construction of Muni Trolley Poles, Overhead Contact System, and Rail Traction Power improvements that provides power to Muni, based on evaluation of the Muni Track and Traction Power Condition Assessment, which serves light rail and trolley coach lines. The projects included in this program are designed to reduce operational problems, reduce maintenance and increase system reliability, provide flexibility in addressing acute needs, and address areas of chronic service outages or emergency repairs.	SF-970170	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled

San Francisco	SFMTA	Cable Car Traction Power & Guideway Rehab	SFMTA: On the Cable Car system: Includes various guideway and infrastructure repair and improvement projects. Covers all street components of the Cable Car system, such as pulleys, switches and turntables. Replace track curves, frogs, sheaves, Barn 12KV, switchgear, DC Motor, mechanical, HVAC, and infrastructure upgrade for the space to comply with latest codes and ADA compliance. Because this is an ongoing program, projects are in varying stages of conceptual design, design, and construction.	SF-99T002	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
San Mateo	Caltrain	Caltrain Electrification	The Electrification Program will electrify the 52-mile Caltrain Commuter line from San Francisco to Tamien. The project includes the following activities: (1) an Environmental Assessment / Environmental Impact Report (EA/EIR) (2) the design and installation of approximately 150 single track miles of overhead contact system (OCS) that will distribute power to the electrically-powered locomotives or electric multiple unit (EMU) trainsets (3) the design and construction of two traction power substations and eight autotransformer stations to deliver the 25kV, 60Hz, single-phase, alternating current to the OCS (4) the design and installation of enhancements to the signaling and grade crossing control systems to make the system compatible with electrification and to provide for future operations service levels and (5) the integration of the Electrification System and Signaling modifications. (6) The development of specifications and the procurement of 98 EMUs.	SF-010028	21-T11-101	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
San Mateo	Caltrain	Caltrain Systemwide Track Rehab and Related Struct	Caltrain: Systemwide: Track Rehabilitation and Related Civil Structure program includes a wide range of track and civil structure projects to maintain these existing assets in a state of good repair. Track rehabilitation work under this program includes rehabilitation and replacement of track and track structure such as switches and switch components, rail lubricators, rail components, eliminate jointed track with welded rail, rail surfacing, rail grinding, replacement of ties and ballast, sub-grade undercutting, placement of asphalt underlay to rehabilitate track subgrade, replacement of existing paved street crossings with new crossing panels. Civil structure rehabilitation and replacement under this program includes existing bridge and bridge components such as foundations, piers, abutments, girders, stringers, deck structures	SM-03006B	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
San Mateo	Redwood City	US 101 / Woodside Interchange Improvement	Redwood City: Route 101 from 0.5 mile south of Route 101/84 Separation to Maple Street Overcrossing and on Seaport Boulevard and Route 84 from Route 101/84 Separation to Spring Street: Widen Woodside Road to six lanes (three in each direction) plus turn pockets, reconstruct all ramp connections between Woodside Road and US 101, construct direct-connect flyover ramps connecting to Veterans Boulevard, and construct additional pedestrian and bicycle facilities throughout the Project area and improve local intersections on Woodside Road and Seaport Boulevard. The Project would not change the alignment or operations of US 101.	SM-050027	21-T06-027	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
San Mateo	CCAG	SM Countywide ITS Improvements - SSF Segment	San Mateo County, City of South San Francisco: County-wide: ITS improvements at various locations in the County. The South San Francisco Expansion will extend the San Mateo County Smart Corridor north to include the Alternate Routes located in the City of South San Francisco. The Smart Corridor Implementation South San Francisco Expansion project	SM-070002	21-T07-057	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
San Mateo	East Palo Alto	US 101 University Ave Interchange Improvements	E. Palo Alto: On University Ave across US 101 btw Woodland Ave and Donahoe St: Add bike lanes and a pedestrian lane and modify the NB and SB off-ramps to eliminate pedestrian/bicycle conflicts and improve the traffic operations. Project will	SM-070006	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	CCAG	San Mateo County SR2S Program	San Mateo County: Countywide: Provide modularized safe routes to school programs and projects that focuses on education, encouragement, evaluation and enforcement components to all interested schools.	SM-110022	21-EN09-132	Exempt (40 CFR 93.126) - Other - Grants for training and research programs	Not Modeled
San Mateo	San Mateo	SR92/El Camino Real (SR82) Ramp Modifications	San Mateo: At the SR92/El Camino Real (SR82) interchange: Modify existing on/off ramps to improve the ingress and egress of the interchange. The overall project cost is estimated to be nearly $10 million. Due to funding availability, the project could be divided into phases: Phase I would be to build the westbound modifications, and Phase II would be to build the eastbound modifications. Includes required follow up landscaping.	SM-110047	21-T06-048	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled

San Mateo	SF City/County	Southern Skyline Blvd. Ridge Trail Extension	Construct a new 6-10 foot wide multi-modal (hiking, biking and equestrian use) wildland trail constructed on the east side of state route 35 "Upper Skyline Blvd" between the intersection of highway 92 and highway 35 southward approximately 6 miles to the SFPUC Peninsula Watershed property boundary with the Golden gate National Recreation Area Phleger Estate. The trail surface will be a combination of native materials and amended/improved materials. The major engineering requirement will be construction of 1000 feet of engineered retaining walls to support the trail tread where the alignment will cross three steep gulches in the northerly portion of the alignment. Three permanent restrooms, trailhead improvements, parking area and trail furniture will also be included in the project.	SM-130031	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	San Mateo County	Hwy 1 Congestion & Safety Improvements	San Mateo County: Highway 1 between Pacifica in the north and Half Moon Bay in the south (approximately 7 miles): Install various improvements such as raised medians, left turn lanes, acceleration lanes, pedestrian crossings, bike	SM-170001	21-T06-030	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
San Mateo	San Mateo	East Hillsdale Boulevard Ped/Bike Overcrossing	City of San Mateo: Over US 101 at the US 101/Hillsdale Boulevard Interchange: Construct pedestrian and bicycle overcrossing	SM-170006	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Caltrain	Caltrain TVM Rehab and Clipper Functionality	Caltrain: Systemwide: Refurbish existing TVM machines and incorporate Clipper functionality that both issue new cards and allow customers to add value in real time. This project will provide each station with a minimum of one dedicated clipper functional ticket vending machine on each station platform. This project will also replace and upgrade clipper card readers (or CID readers) at Caltrain stations as part of the MTC?s Clipper upgrade project.	SM-170010	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of office, shop, and operating equipment for	Not Modeled
San Mateo	Half Moon Bay	Half Moon Bay - Poplar Complete Streets	Half Moon Bay: Phase 1 on Poplar St from Main St to Hwy 1: Implement complete street improvements including full depth pavement reconstruction, curb and gutter, crosswalk enhancements, sidewalks and bicycle lanes to approximately 900 lineal feet of road. Phase 2 will construct improvements from Hwy 1 to Railroad Avenue subsequent to phase 1 completion	SM-170013	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	San Bruno	Huntington Transit Corridor Bike/Ped Improvements	San Bruno: On Huntington Ave from San Bruno Ave to Herman St : Implement pavement preservation and bike/ped facilities including the following: construction of a two-way cycle track along the northbound side of Huntington Avenue, a sharrow will be placed in the rightmost lane going southbound along with designated bike route signage Huntington Avenue will receive a slurry sealed treatment along the entire project area installation of streetscape improvements such as pedestrian scale lighting, landscaping and/or public art.	SM-170017	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Belmont	Belmont Pavement Preservation	Belmont: The proposed pavement repair and rehabilitation improvements include digouts, crack sealing, slurry sealing, thermoplastic striping and pavement markings at the following eight locations: Chula Vista from Alameda de las Pulgas to Ralston Avenue 6th Avenue from Ralston Avenue to Hill Street 6th Avenue from Emmett Avenue to Harbor Boulevard Cypress Avenue from Laurel to Middle Road Dale View from Hiller to Old Country Road Elmer from Ralston Avenue to	SM-170043	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
San Mateo	Portola Valley	Portola Valley Street Preservation	Portola Valley: Westbridge Drive (approximately Alpine Rd to Cervantes Rd) Alpine Road (approximately Willowbrook Dr. to Nyland Gate) Alpine Road (approximately Ladera to 200' N/O Hillbrook Dr) Corte Madera Rd (approximately Alpine Rd to Portola Rd). Pavement preservation including pavement grinding, base repair, slurry seal, thermoplastic traffic striping and pavement markings, and other misc work related to road resurfacing	SM-170044	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
San Mateo	CCAG	ITS Improvements in San Mateo County Northern Citi	San Mateo County: In San Mateo County Northern Cities Daly City, Brisbane, and Colma along the US 101 corridor to the SF County line, and on I-280 from I-380 to the San Francisco County Line: Continue the ITS improvement implementation efforts of City/County Association of Governments of San Mateo County (C/CAG), California Department of Transportation	SM-170046	21-T07-057	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
San Mateo	San Carlos	Brittan Ave. Widening	San Carlos: At the intersection of Brittan and Industrial Road: Widen sections of both roadways near the intersection, adding a turning median on Brittan Avenue to the west of the intersection, adding a left turn lane on eastbound Brittan Avenue, and adding a second left turn lane on southbound and northbound Industrial Road	SM-190001	21-T07-056	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
San Mateo	Redwood City	Roosevelt Ave Quick-build Traffic Calming	Redwood City: Along Roosevelt Ave: Install quick-build improvements to implement the approved, traffic calming plan with features to reduce speeding, enhance crossings, and address overall traffic safety including RRFBs, bulb-outs, a roundabout, high-visibility and raised crosswalks, bicycle-friendly speed humps, advance yield signage, splitter island, wayfinding signage for the Peninsula Bikeway, travel lane reduction, and opportunities for landscaping, seating, bike racks,	SM-210002	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled

San Mateo	San Bruno	San Bruno Transit Corridor Ped Connection Ph4	San Bruno: At the intersection of San Bruno Ave and Green Ave: Implement enhancements to improve pedestrian connectivity including installing curb extensions and accessible curb ramps. The Transit Corridor Pedestrian Connection Project aims to improve pedestrian connectivity within the City's Transit Corridor Area by enhancing the streets directly adjacent to the downtown core of San Bruno.	SM-210003	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Burlingame	Burlingame - Broadway Grade Separation	Burlingame: Broadway Ave at the Caltrain ROW: Grade separate Broadway from the Caltrain tracks, reconstruct the Broadway Caltrain station to meet current standards (eliminating the existing hold-out rule that currently prohibits north and south bound trains from passing through the station at the same time), the relocate and reconfigure parking from the west to the east side of the tracks, a new pedestrian and bicycle access crossing in proximity to Carmelita Avenue, and the grade separation of an existing at-grade pedestrian/bicycle access at Morrell Avenue within close proximity to the existing crossing.	SM-210004	21-T11-103	Exempt (40 CFR 93.126) - Safety - Railroad/highway crossing	Not Modeled
San Mateo	San Mateo	Delaware Street Safe Routes to School Corridor	San Mateo: Delaware St from 19th Ave to Pacific Blvd: Implement bicycle and pedestrian improvements including Class IV separated bike lanes and bicycle boulevard, upgrade pedestrian facilities, and connections to existing facilities. The Delaware Street Safe Routes to School Corridor is a high-priority project identified in the City's 2020 Bicycle Master Plan	SM-210006	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Burlingame	Burlingame Ped Safe Routes and Mobility Imp	Burlingame: Various locations near schools and transit, target approximately 22 locations: Implement quick build pedestrian safety improvements including installation of high-visibility crosswalks, advance pavement markings, striped bulb-outs, red curbing, and RRFBs.	SM-210007	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	SSF	South San Francisco East of 101 Transit Expansion	South San Francisco: Various locations including on Oyster Point Blvd between Veterans Blvd and Eccles Ave, Gateway Blvd between Oyster Point Blvd and E Grand Ave, and E Grand Ave between Gateway Blvd and Haskins Way: Install 11 new bus stops and upgrade 2 existing stops, enhance sidewalk and crosswalk.	SM-210008	21-T10-093	Exempt (40 CFR 93.126) - Mass Transit - Construction of small passenger shelters and information	Not Modeled
San Mateo	Burlingame	Burlingame Square Caltrain Station Mobility Hub	Burlingame: At the intersection of California Drive and Burlingame Avenue, adjacent to the Burlingame CalTrain Station: Implement streetscape improvements that enhance safety and accessibility including seating areas, bicycle racks, pedestrian-scale lighting and traffic signal improvements, sidewalk improvements, and pedestrian level wayfinding to help	SM-210009	21-T03-009	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Millbrae	Millbrae Transit Center MicroMobility Hub Pilot	Millbrae: Near the Millbrae Transit Center, in a City-owned parking lot: Install new local mobility hub including providing approximately a 5 bike-share, e-bikes station, bike racks, wayfinding signs, site amenities such as shaded waiting area and plantings, and ADA improvements. This area will help bridge first-and last-mile gaps.	SM-210010	21-T03-009	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Millbrae	Park Blvd, San Anselmo Ave and Sta. Teresa Wy Imps	Millbrae: Along San Anselmo Ave, Park Blvd, and Santa Teresa Way: Installation of traffic calming, pedestrian and bicycle improvements. Installation will include new striped bulbouts, reflective flexible posts, and re-striping of the crosswalk. The project will also include installation of green-backed sharrows, signage, and striping updates to integrate a new Class 3	SM-210011	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Daly City	Southgate Ave and School St Safety Improvements	Daly City: Southgate Ave from St. Francis Blvd to Sullivan Ave and School Street from Junipero Serra Blvd to Mission St: Safety improvements including would install edgelines, painted bulb-outs and high-visibility crosswalks to increase	SM-210012	21-T09-061	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
San Mateo	MTC	Regional Planning Activities and PPM - San Mateo	San Mateo County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on SM-170002.	SM-210013	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
San Mateo	SamTrans	SamTrans Bus Replacement	SamTrans: Bus Fleet: Replace buses that have reached the end of their useful life. This project will procure 135 transit buses to replace an equal number of 2009 Gillig buses that have reached the end of their useful life.	SM-210014	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
San Mateo	SamTrans	SamTrans Paratransit Vehicle Replacements	SamTrans: Paratransit vehicle fleet: Replace vehicles that have reached the end of their useful life. Vehicles to be replaced between FY2022 and FY2024 include: FY22--21 cutaway buses, FY24--14 minivans, FY24--9 cutaway buses.	SM-210015	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled

San Mateo	SamTrans	SamTrans South Base BEB Charging Infrastructure	SamTrans: South Base: Install electrical charging Infrastructure including design and construction of charging infrastructure and bus charging bays, procurement and installation of 37 overhead pantograph charging dispensers, and design and construction of essential power distribution networks.	SM-210201	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
San Mateo	Burlingame	Rollins Road Bicycle and Pedestrian Improvement	Burlingame: Rollins Road north of Broadway to Millbrae City limit near Adrian Road: Implement Road Diet; Striping and Signage; Pedestrian Crossing Improvement; ADA corner ramp and Bulb-out installation; separate Class IV bikeway; median installation and rectangular rapid flashing beacons. The existing multilane roadway is 64-ft wide curb to curb, with 10-ft ROW on each side, consisting of four vehicle travel	SM-230201	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Colma	El Camino Real Complete Streets Mission-Arlington	El Camino Real Complete Street Project (Segment B) is a component of a larger El Camino Real (ECR) Improvement Project. The improvements on ECR Segment B include construction of new accessible sidewalks, bicycle facilities, along	SM-230202	21-T08-060	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
San Mateo	Menlo Park	Middle Avenue Pedestrian and Bicycle Undercrossing	Construct a grade separated pedestrian and bicycle crossing of the Caltrain railroad in the vicinity of Middle Avenue in the City of Menlo Park.	SM-230203	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Redwood City	Roosevelt Avenue Traffic Calming project	Installation of traffic calming measures on Roosevelt Avenue between Alameda de las Pulgas and El Camino Real including a road diet near the Upton St intersection	SM-230204	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
San Mateo	SMCTA	19th Avenue/Fashion Island Blvd	The 19th Avenue/Fashion Island Boulevard Complete Street Class IV Bikeway (Bikeway) is located along 19th Avenue/Fashion Island Boulevard between the City of San Mateo and City of Foster City. The proposed mile long new bikeway extends between the Hayward Park Caltrain Station in City of San Mateo and the Bridgepointe Parkway shopping	SM-230205	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	SSF	School St/Spruce Ave and Hillside Blvd Safety Imps	Project improvements will provide students and other residents with safe active transportation modes on busy Hillside Boulevard and on Spruce Avenue/School Street through placement of a traffic signal, high visibility cross walks, ADA compliance improvements, curb ramps, bulb-outs, and drainage improvements.	SM-230206	21-T08-060	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
San Mateo	San Mateo County	Bay Road Complete Street Rehabilitation	The Project is a joint effort with the City of Redwood City to make improvements within the Project limits for all road users who use or cross Bay Road, between 5th Avenue and 15th Avenue/Spring Street. The Project will include pedestrian crossing improvements, new bicycle facilities, new ADA-compliant curb ramps, traffic stripings and markings, pavement repairs, improved transit facilities, and green infrastructure.	SM-230207	21-T08-060	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
San Mateo	Pacifica	Sharp Park PDA Improvements	The Sharp Park PDA Pedestrian Improvement Project will close sidewalk gaps, improve sidewalk to above ADA standards, install new ADA compliant driveways and corner curb ramps, install curb and gutter to improve storm water management, remove and replace failed pavement, slurry seal, and install bicycle and pedestrian striping along Paloma Avenue, Carmel Avenue and Santa Maria Avenue from Francisco Boulevard to Beach Boulevard.	SM-230208	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	Caltrain	Caltrain Railcar Replacement	Procurement of high-performance EMUs to replace diesel locomotive trains and enhance the speed, capacity, safety, and reliability of Caltrain, the primary commuter rail service for millions of residents in the San Francisco Bay Area. The Project will enable Caltrain to eliminate diesel service originating and terminating on the main transit link between the major employment centers of San Francisco and San Jose, reducing emissions and noise pollution in the equity priority communities along the corridor. The Project will advance the US Department of Transportation goal of transitioning to a cleaner and more energy-efficient future, and forms part of a larger formal electrification initiative at Caltrain (PCEP).	SM-230209	21-T11-101	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
San Mateo	SamTrans	El Camino Real Mid-County Multimodal Corridor Plan	The El Camino Real Mid-County Plan will integrate SamTrans' transit priority capital improvement vision with local visions for bicycle facilities, pedestrian improvements, parking, and/or general-purpose travel lanes along El Camino Real (CA State Route 82), in the cities of San Mateo, Belmont, and San Carlos. This will result in comprehensive conceptual level designs, developed in partnership with cities and local communities, for improving transit performance. The proposed plan will build on the conceptual	SM-230210	21-T12-119	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled

San Mateo	Woodside	Woodside Road Bike and Ped Improvements E of I-280	This project would provide bike and ped safety enhancements on Woodside Rd between I-280 and Alameda de las Pulgas. Improvements would likely include green bike lane markings, bike lane buffer, vehicle speed reduction through signage and striping changes, and potentially other traffic calming and bike safety measures. The project is within Caltrans right of way. The Town has been awarded $800,000 in Community Project Funding through the efforts of Congresswoman Anna Eshoo.	SM-230211	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	San Mateo County	Santa Cruz Ave/Alameda de las Pulgas Complete St	The work to be done consists, in general, of reducing the number of travel lanes by constructing bicycle and pedestrian improvements, which include concrete islands, bulb-outs, and curb ramps. It also involves the removal of damaged sidewalk, roadway, and miscellaneous concrete, as well as the re-alignment of the curb line, gutter, sidewalk, and driveway. Additionally, the project includes drainage improvements with the placement of new storm drains, utility adjustments, removal of old striping and markings, restriping, traffic signal light modifications, creation of protected	SM-230212	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
San Mateo	Atherton	Alameda de las Pulgas Traffic and Safety Imps	Traffic safety improvements on Alameda de las Pulgas including but not limited to removal of a mid-block pedestrian activated signal and crossing between Mills Avenue and Camino al Lago, signalization of the Camino al Lago intersection, geometric modification and signalization of the Atherton Avenue intersection, green infrastructure and drainage improvements, curb ramps, complete streets, slurry seal (if within the budget) and signing, striping and pavement markings.	SM-230214	21-T08-060	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
San Mateo	Belmont	Ralston Avenue Segment 4	A complete streets project focusing on circulation, safety, pedestrian and bicycle improvements along Ralston Avenue between Alameda de las Pulgas to the western City limit at Christian Drive. Improvements to sidewalk, crosswalks, ramps, pavement, and bicycle facilities will be done as part of the project to improve mobility and safety for all modes of transportation. The design is based on the Ralston Avenue Corridor Study and Improvement Plan which was adopted in August 2014. The project has a conceptual design and needs detailed PSE and Construction funding.	SM-250202	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
San Mateo	SSF	South Linden Grade Separation Project	This Project will raise the railroad between Colma Creek Bridge in South San Francisco, CA and the I-380 overcrossing in San Bruno, CA, with grade separation structures at South Linden Avenue in South San Francisco and Scott Street in San Bruno. South Linden Avenue will be partially lowered and reconstructed with pedestrian and bicycle access and safety improvements. At the Scott Street crossing, motor vehicle access will be closed and a pedestrian and bicycle undercrossing will be constructed.	SM-250203	21-T11-103	Exempt (40 CFR 93.127) - Changes in vertical and horizontal alignment	Not Modeled
San Mateo	Belmont	Alameda de las Pulgas Corridor Improvements	A multi-agency regional transportation improvement project involving cities of Belmont, San Carlos, and two School Districts (Sequoia Union High School and San Carlos School District) along the Alameda de Las Pulgas (ADLP) and San	SM-250204	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	VTA: Standard and Small Bus Replacement	VTA: Fleetwide: Standard and Small Bus Replacement	SCL050001	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Santa Clara	VTA	VTA: Rail Replacement Program	VTA: Rail Replacement Program throughout the Light Rail system (no rail expansion).	SCL050002	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
Santa Clara	San Jose	Bay Trail Reach 9 & 9B	San Jose: From the existing San Francisco Bay Trail/Highway 237 Bikeway Trail to the Bay Trail designated parking spaces (adjacent to the publicly accessible Marriott Hotel property) design and construct 1.1 miles of commuter/transportation trail with construction and environmental documents to describe the installation of asphalt-	SCL050082	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	San Jose	San Jose: Los Gatos Creek Reach 5 Underpass	In San Jose: Los Gatos Creek Trail between Auzerais Ave and Montgomery/Bird Ave: Construct Los Gatos Creek Trail (Reach 5b/c). Construction documents will cover trail underpasses beneath railway bridge and San Carlos St bridge, ramping system leading to underpasses, development of new paved trail leading to Montgomery Ave.	SCL110029	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	VTA Track Intrusion Abatement	VTA: Various locations along trackway: Take steps to prevent track intrusion into light rail trackway at intersections and locations currently subject to trespassing. Planned improvements include installation of fencing, barriers, signage, flashing signs, and pavement markings at locations identified and approved by VTA's Safety Committee.	SCL150008	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
Santa Clara	VTA	I-280/Winchester Blvd Interchange Improvement	San Jose: I-280/Winchester Interchange: Construct new off-ramp from northbound I-280 would connect to Winchester Boulevard via Tisch Way. The new off-ramp would diverge from the current northbound I-280 off-ramp to Stevens Creek	SCL150014	21-T06-017	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled

Santa Clara	VTA	VTA: Paratransit Vehicle Procurement	VTA: Paratransit Fleet: Procure vehicles and associated equipment for paratransit services.	SCL170005	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Santa Clara	Sunnyvale	Sunnyvale SNAIL Neighborhood Improvements	Sunnyvale: Various locations: Add bulbouts, create new bicycle lanes and bicycle boulevards. The project will enhance bike lanes, add green bike lanes, create new bicycle lanes/routes and boulevards. The project will also add high visibility crosswalks and install crosswalk warning system at selected locations in Sunnyvale's SNAIL and San Miguel Neighborhoods. SRTS improvements will be constructed for Columbia Middle School and San Miguel Elementary School.	SCL170017	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Santa Clara	Sunnyvale	Bernardo Avenue Bicycle Underpass	Sunnyvale: Between North and South Bernardo Avenue under the Caltrain tracks: Construct bicycle underpass. Bernardo Avenue is a two lane collector roadway that is located in the western portion of the City of Sunnyvale. It stretches from Homestead Road in the south near Cupertino and Middlefield Road in the north near Mountain View. It serves as a major	SCL170020	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Sunnyvale	Peery Park "Sense of Place" Improvements	Sunnyvale: In Peery Park Specific Area on Potrero Avenue from Maude Avenue to Central Expwy: Install sidewalks, pedestrian improvements, crosswalk improvements, ADA compliant curb ramps and possible curb extensions to reduce pedestrian crossing distances.	SCL170023	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	San Jose	San Jose Pavement Maintenance	San Jose: Various roadways including - Cherry Av from Almaden Ex to Branham Ln, Fruitdale Av from Bascom Av to Southwest Ex, Lean Av from Blossom Hill Rd to Chynoweth Av, Meridian Av from Camden Av to Blossom Hill Rd, Naglee Av from Forest Av to The Alameda, O'Toole Av from Montague Ex to Brokaw Rd, Piedmont Rd from Landess Av to Penitencia Creek Rd, Pine Av from Hicks Av to Bird Av, Santa Teresa Blvd from Bernal Rd to City Limit (3,000 feet south of	SCL170044	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Santa Clara	VTA	VTA: Non-Revenue Vehicle Procurement	VTA: Systemwide: Acquire non-revenue vehicles to replace existing units that have reached the end of their useful life. This ongoing program schedules the acquisition of Non-Revenue Vehicles to replace existing units that have high mileage, have had a history of mechanical failures, or have been decommissioned because of mechanical failures which were not	SCL170047	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of support vehicles	Not Modeled
Santa Clara	San Jose	W San Carlos Urban Village Streets Improvements	San Jose: West San Carlos St between I-880 and McEvoy St: Implement safety improvements including median islands, ADA curbs ramps, flashing beacons, enhanced crosswalks, curb extensions, green infrastructure, traffic signal modifications and bike racks	SCL170061	17-07-0001	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	VTA	I-280 Soundwalls - SR-87 to Los Gatos Creek Bridge	San Jose: On I-280 between SR 87 and Los Gatos Creek Bridge: Construct soundwalls. Ambient noise level decibels affecting pre-existing residential areas adjacent to I-280 in accordance with Streets and Highways Code Section 215.5 on I-280.	SCL170064	21-T07-056	Exempt (40 CFR 93.126) - Other - Noise attenuation	Not Modeled
Santa Clara	VTA	Hwy. Transp Operations System/FPI Phase 1 & 2	Santa Clara County: At various locations: Implement Transportation Operations System/Freeway Performance Initiative projects which includes freeway ITS infrastructure, arterial management, incident management, emergency preparedness, and operations and maintenance of ITS infrastructure.	SCL190003	21-T07-056	Exempt (40 CFR 93.126) - Safety - Traffic control devices and operating assistance other than	Not Modeled
Santa Clara	VTA	I-280/Wolfe Road Interchange Improvement	Cupertino: I-280 at Wolfe Rd interchange: Replace existing overcrossing structure, modify existing on-ramps and and off-ramps, modify existing local street intersections and upgrade bicycle and pedestrian facilities, construction auxiliary lanes, retaining walls, and soundwalls as needed.	SCL190011	21-T06-017	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	VTA	US 101/San Antonio Rd/Charleston/Rengstorff IC Imp	Mountain View and Palo Alto: US 101/San Antonio I/C: Reconstruct to a full interchange At the US 101/Charleston/Rengstorff interchange: Modify on- and off-ramps Between interchanges: Add new auxiliary lane to improve overall traffic operations and local circulation for all modes	SCL190012	21-T06-028	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	VTA	US 101/SR 25 Interchange - Phase 1	Unincorporated southern Santa Clara County south of Gilroy: at the US 101 and SR 25 interchange: Reconstruct the interchange at a location just north of the existing interchange. The improvements would include a new, widened bridge to convey SR 25 over US 101. It would also improve ramps for all traffic movements between US 101 and SR 25. The	SCL190013	21-T06-028	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	VTA	VTA: HVAC Replacement	VTA: At various facilities system-wide: Replace heating, ventilation and cooling equipment including four rooftop units at Guadalupe Division, two rooftop units at Chaboya Division, five rooftop units at Cerone Division, ten rooftop units at River Oaks Division. New equipment will be integrated into Energy Management System (EMS).	SCL190026	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of office, shop, and operating equipment for	Not Modeled
Santa Clara	San Jose	Willow-Keyes Complete Streets Improvements	San Jose: Along Willow St from LeLong St to Graham Ave, Graham Ave from Willow St to Sherman St, and Goodyear/Keyes St from Sherman St to 3rd St: Construct bicycle and pedestrian safety improvements including road diets	SCL190028	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	San Jose	Better Bikeway San Jose - San Fernando Street	San Jose: On San Fernando St from Almaden Blvd to 11th St: Construct bicycle and pedestrian safety improvements including bicycle signals, transit boarding islands, and dutch-style protected intersections.	SCL190029	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Santa Clara	Mountain View	Rengstorff Ave Grade Separation	Mountain View: At the intersection of Rengstroff Ave and the Caltrain right-of-way: Grade separate Caltrain at Rengstorff Avenue in Mountain View by lowering Rengstorff Avenue under the Caltrain tracks, constructing a bike/pedestrian bridge over Rengstorff parallel to the Caltrain bridge, and including bike/pedestrian improvements on Rengstorff under Caltrain.	SCL190032	21-T11-103	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	VTA	VTA: Guadalupe Steam Rack Improv & Liner Replace	VTA: At Guadalupe Division: Replace existing steam rack (light rail) track with a new liner system and overhead roof structure. The liner system will feature more efficient collection of steam water and the roof structure will be long and wide enough to reduce the unnecessary collection and treatment of rain water.	SCL190053	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	US 101/SR 152/10th Ramp and Intersection Imp.	Gilroy: US-101/SR-152/10th St Interchange: Widen the existing bridge, modify existing on- and off-ramp upgrade local roadways to current standards to improve local circulation. Implement "Complete Streets" element" to improve bicycle and pedestrian connectivity.	SCL210002	21-T06-048	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	Campbell	SR 17 Southbound/Hamilton Ave. Off-Ramp Widening	Campbell: Southbound Route 17 at Hamilton Ave: Widen off-ramp to improve operations. Add sharrows, green bike lane markings, ADA curb ramps, straighten west leg crosswalk, modify traffic signal at the Hamilton/Salmar intersection.	SCL210003	21-T06-048	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	VTA	VTA Rail Substation Rehab/Replacement	VTA: Light Rail System. Replacement of Traction Power Substation (TPSS) #11 located near Ohlone / Lick Spur and TPSS along Tasman West and Tasman East lines.	SCL210006	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Santa Clara	Mountain View	Mountain View - Stierlin Rd Bike-Ped Improvements	Mountain View: Along Stierlin Road from Central Expressway (opposite Mountain View Transit Center), Central Avenue and Shoreline Boulevard: Implement bicycle and pedestrian improvements including a) Class IV protected bike lanes on Shoreline Boulevard south of Middlefield Road to Montecito Avenue, b) traffic calming and pedestrian improvements on Central Avenue and Stierlin Road, including bulbouts, high-visibility crosswalks, pedestrian and street lighting improvements, midblock raised crossing and speed hump, c) green-backed sharrows on Stierlin Road between Windmill Park Lane/Wright Avenue and Washington Street and Class II bike lanes on Stierlin Road slip ramp, d) protected intersection at Shoreline Boulevard/Montecito Avenue-Stierlin Road, and e) Pedestrian activated midblock crossing on Shoreline Boulevard adjacent to the Safeway Shopping Center.	SCL210012	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	San Jose	En Movimiento - Quick Strike Improvements	San Jose: Various locations in East San Jose: Build bike boulevard corridors that will provide safe and comfortable connections to existing and planned transit, as well as many popular destinations. The En Movimiento Quick Build Network project aims to provide bike and pedestrian improvements to East San Jose as envisioned in the En Movimiento Transportation Plan. The proposed network consists of eight bike boulevard corridors that will provide safe and comfortable connections to existing and planned transit, as well as many popular destinations. The project will serve East San Jose, one of our more under-resourced communities. The proposal calls for bike boulevard and pedestrian treatments including traffic circles, traffic diverters, high visibility crosswalks, pedestrian bulb-outs, wayfinding/signage, and chicanes-speed humps.	SCL210015	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	San Jose	San Jose Downtown Bikeways - Quick Strike	San Jose: Various locations in the downtown area (project limits include 3rd St from St. James to Keyes, 4th St from Julian to Reed, San Salvador St from 4th to 10th, 2nd St from Reed to Keyes, and Taylor/Mabury from 21st to Lenfest): Enhance existing facilities to become a connected network of Class IV (Separated) and Class III (Bike Boulevard) all-ages-and abilities. The Downtown Bikeways project will take downtown bikeways from temporary to permanent, adding more robust protection to the downtown bicycle network in San Jose and filling network gaps. This project will build on the success of the Better BikewaySJ project. After 3 years of interim design, the plastic bollard protection shows wear, and is frequently blocked by non-compliant parking and loading vehicles. This project will add surface concrete curbs, which will help keep the lanes clear, and make the street design more understandable for all users.	SCL210016	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	VTA Electronic Locker Upgrade and Replacement	VTA: At VTA park and ride lots, Light Rail Stations and Transit Centers: Replace 189 bicycle lockers (135 long-term rental lockers and 54 electronic lockers retrofitted in 2009/2010) located at VTA park and ride lots, Light Rail Stations and Transit Centers with new, Wi-Fi enabled, electronic lockers. The lockers VTA is replacing are 20 to 30 years old and have physically decayed to be inoperable, insecure, and must be replaced to provide service. Replacement will permit VTA to serve more customers and provide real-time availability and advance reservation capabilities. The project will fund outreach to current rental locker customers and marketing to highlight the improved bike lockers and encourage their use.	SCL210017	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Saratoga	Blue Hills Elementary Pedestrian Crossing at UPRR	Saratoga: Parallel to Fredericksburg Dr and Guava Ct and the Union Pacific Railroad Vasona Branch: Reopen and construct an at-grade bike/ped crossing connecting Fredericksburg Dr. and Guava Ct, which provides pedestrian connectivity to Lido Way. The project proposes to construct a 10-foot wide walkway over the UPRR Vasona Branch tracks within the existing 20-foot wide City access easement. An ADA-Compliant landing will be provided at both ends and center	SCL210018	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Santa Clara	VTA	SR 237/Lawrence Expressway/Carribean Dr IC Imp	Sunnyvale: SR-237/Lawrence Expressway/Carribean Dr Interchange: Modify interchanges to relieve congestion and improve traffic operations including modifing on and off ramps, upgrading local roadways to current standards, enhancing roadway safety, and implementing Complete Street element and improving bicycle/pedestrian connectivity. Plan Bay Area 2050 : 21-T06-043	SCL210019	21-T06-043	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	San Jose	SR 87/Capitol Expressway/Narvaez Ave. IC Imp	San Jose: SR 87/Capitol Expressway interchange: Modify the existing interchange with standard northbound on and off ramps that connect directly to Capitol Expressway instead of Narvaez Avenue. Improvements include adding a signalized	SCL210020	21-T06-040	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	VTA	US 101/Ellis Street Interchange Improvement	Mountain View: US 101/Ellis Street Interchange Modify: Modify interchange. Plan Bay Area 2050 RTP TIP 21-T06-028	SCL210021	21-T06-028	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	Campbell	Campbell PDA Enhancements	Campbell: Various streets in the vicinity of the Campbell PDA including Campbell Ave, Civic Center Dr, and Orchard City Dr: pedestrian and bicycle safety improvements including accessibility ramps, curb extensions, intersection reconfiguration, sidewalks, traffic signal modification, signs, striping	SCL210024	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	Mountain View	Mountain View Mobility Hub Pilot	Mountain View: At the Mountain View Transit Center: Implement multi-modal enhancements including upgrading the existing bike storage room with new racks and utility upgrades (These improvements would allow for a public/private operation that would provide more accessible daily use and include marketing to increase usage), micro-mobility park-and-charge, charging ports for bikes and scooters (including access to grid power and data feeds), bicycle fix-it stations, mobility information kiosks, reconfiguration of western portion of Caltrain lot to provide new loading areas for TNCs and car-	SCL210025	21-EN09-132	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Mountain View	Mountain View Shoreline Blvd Pathway Improvements	Mountain View: Adjacent to Shoreline Blvd from Wright Ave to Villa St: Reconstruct a pathway connection to connect neighborhoods and the Transit Center and Downtown. Project scope includes removal of the existing pathway, installation of a new ADA-compliant bicycle and pedestrian pathway, curb, gutter, curb ramps, stairs, pathway lighting, landscaping,	SCL210027	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	SR-17 Bike/Ped Trail and Wildlife Crossing	Santa Clara County: SR-17 South of Los Gatos: Construct a separate Highway 17 wildlife undercrossing at a top roadkill hotspot on the eastern slope of the Santa Cruz Mountains, up to 5.4 miles of related directional fencing, and a multi-use	SCL210028	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	MTC	Regional Planning Activities and PPM - Santa Clara	Santa Clara County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on SCL170001	SCL210029	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Santa Clara	VTA	N 1st/Tasman EB Track Switch Mod - TSP Enhancement	San Jose: At the Champion station In the vicinity of the North First St and Tasman Dr intersection: Modify the eastbound trackway circuit to trigger the eastbound transit signal priority (TSP) service calls earlier with the goal of reducing delays for eastbound light rail vehicles.	SCL210030	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Santa Clara	Cupertino	Cupertino Stevens Creek Blvd Class IV Bike Lanes	Cupertino: On Stevens Creek Blvd between Wolfe and Hwy 85: Convert existing Class II bike lanes to Class IV bike lanes. Improvements include installing pre-cast concrete vertical curbs, in-line floating bus stops and associated drainage improvements, traffic signal modifications with bicycle phasing, revised signage and striping, and removal of crosswalk	SCL210034	21-T07-056	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	SR 237 Westbound On-Ramp at Middlefield Rd.	Mountain View: Along Middlefield Rd from Logue Dr to 400 feet south of the eastbound SR 237 off-ramp: Improve traffic operations and enhance safety and implement Complete Streets improvements coordinated with other City of Mountain View improvements for enhanced bicycle and pedestrian access and safety.	SCL230001	21-T06-043	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Santa Clara	Santa Clara	De La Cruz/Lick Mill/Scott Blvds Bicycle Lanes	Santa Clara: On three corridors (De La Cruz Blvd: Montague Expressway to Trimble Road, Lick Mill Blvd: Tasman Drive to Montague Expressway, and Scott Blvd: Calabazas Creek Trail to Saratoga Avenue): Complete traffic analyses, public outreach, design, and construction of bicycle facilities . The project will enhance safety, improve mobility, and reduce vehicle emissions by implementing high priority bicycle projects identified in the Santa Clara Bicycle Plan Update 2018.	SCL230202	(blank)	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	Cerone Operations Command and Control Center	VTA: At Cerone Bus Operating Division: Construct a new Operations Command and Control Center (OCC) Theater that would include Bus and Light Rail Workstations displaying the entire VTA Bus and Light Rail System in real time. The new OCC would support SCADA, Information Technology, and Telecommunications Rooms with staff offices for both the OCC facility and field staff. The new facility would also include a Training Center and Situation Room.	SCL230203	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Construction of new bus or rail storage/maintenance	Not Modeled
Santa Clara	Morgan Hill	Monterey Road Traffic, Bicycle, and Pedestrian Imp	The project consists of slurry sealing the roadway, which will include localized pavement repairs and crack sealing for preventative maintenance; new thermoplastic striping for buffered bicycle lanes and green colored pavement treatment enhancements for the existing Class II bicycle facilities at intersections, conflict points, and their approaches; complete	SCL230204	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Santa Clara	Central Santa Clara Bicycle and Pedestrian Improve	Construct 36 curb ramps,12 curb bulb-outs, 50 feet of new sidewalk, 2 new traffic signals, 2 new Pedestrian Hybrid Beacons, 2 new Rectangular Rapid Flashing Beacons, upgrade 2 existing traffic signals, install10 streetlights, 5,000 ft of fiber optic cable, and over 5,000 ft of Class II & III bike lanes.	SCL230205	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Santa Clara	Los Altos	N San Antonio Rd Complete Streets Project	Streetscape project along N San Antonio Rd from Foothill Expressway to El Camino Real. Includes Class IV protected bikeways, pedestrian enhancements, enhanced crossings, median landscaping, median curb reconstruction, resurfacing treatment.	SCL230206	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	San Jose	White Road Complete Streets Safety Improvements	This project will install 3 new traffic signals along the corridor to improve pedestrian accessibility to bus stops, schools, and retail, and reducing one of the longest stretches without a controlled crossing on the corridor from 2700' to 1700'). In addition, this project will improve safety for people walking and biking through protected intersections, new crosswalks, high visibility crosswalks, lane reduction, slip lane removal, and protected bike lanes.	SCL230207	21-T08-060	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Santa Clara	San Jose	Jackson Ave Complete Streets	The Jackson Avenue Complete Streets Project will provide transit, bicycle, and pedestrian enhancements along Jackson Avenue, a multilane corridor that runs parallel to I-680 in East San José. This project will improve safety, travel options, and access for underserved communities. Project may include new signals and intersection channelization	SCL230208	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Santa Clara	San Jose	Signalized Intersections Pedestrian Safety Improve	This project seeks to improve existing traffic signals at 3 signalized intersections in San Jose: Reed & Seventh, First & Virginia, and Dana and Naglee. Improvements include addition of protected left turns, upgrading existing equipment to the latest standards (additional signal heads, accessible pedestrian push button signals, video	SCL230209	21-T09-061	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Santa Clara	Mountain View	Moffett Boulevard Complete Streets	Repaving and installation of Class II bike lanes and Class IV protected bikeways between Middlefield Road and the northern terminus of Moffett Boulevard (Clark Road), a sidewalk gap closure between Stevens Creek Trail and Leong Drive, and intersection improvements at Moffett Boulevard/State Round 85, pending Caltrans approval consistent with the	SCL230211	21-T08-060	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Santa Clara	Mountain View	Middlefield Road Complete Streets	Repaving of Middlefield Road between Moffett Boulevard and Whisman Road and new Class IV protected bikeways, between Moffett Boulevard and Bernardo Avenue, consistent with the City of Mountain View's Bicycle Transportation Plan.	SCL230212	21-T08-060	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Santa Clara	Mountain View	El Camino Real/El Monte/Escuela Intersection Imps	Removal of the existing slip lane, installation of high visibility crosswalks, Class IV protected bikeways, green dashed conflict zones, and green bike boxes (pending Caltrans approval) and consistent with the City of Mountain View's El Camino Streetscape Plan	SCL230213	21-T08-060	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Santa Clara	VTA	Transit Reliability Imp and Performance System	VTA: Provide transit signal priority (TSP) capabilities throughout Santa Clara County at all traffic signals buses operate through, which are currently managed by four different and incompatible control systems. The project takes advantage of approaches used on the Internet of Things (IoT) with remote virtualized servers monitoring and controlling traffic signals through standardized communication protocols. These remote virtualized servers utilize the real-time tracking of buses to	SCL230214	21-T10-064	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	Wheels on the Bus – Real-Time Data (RTD)	A feasibility study to evaluate technologies capable of collecting and disseminating real-time use data for VTA's front-mounted bus bike racks and interior mobility device securement equipment. The desired technology should provide real-time information to VTA internal stakeholders and customers. The project will evaluate the integration of this real-time data	SCL230215	21-T10-064	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Santa Clara	VTA	Monterey Road Transit Lane	VTA: In San Jose: Implement a road diet and install a dedicated bus lanes and protected bicycle lanes on Monterey Road in San Jose from the intersection with Keyes Rd/1st St to Ford Rd to improve transit travel times while improving safety for	SCL230216	21-T10-064	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	VTA	Expand Cerone Bus Yard for Electric Vehicles	VTA: In San Jose: Define additional modifications and engineering work to expand bus charging capacity at Cerone Bus Yard.	SCL230218	21-EN08-131	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	Expand Chaboya Bus Yard for Electric and Fuel Cell	VTA: In San Jose: Modifications and engineering work required at Chaboya Bus Yard to increase operational efficiency and installation of zero emission bus infrastructure, both electric and hydrogen, as well as servicing of articulated vehicles.	SCL230219	21-EN08-131	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	Santa Clara	Anna Dr Neighborhood Flood Protection	The project will upsize the existing storm drain system in the Anna Drive neighborhood east of San Tomas Aquino Creek to meet current flood protection requirements.	SCL230220	21-T08-060	Exempt (40 CFR 93.126) - Other - Plantings, landscaping, etc	Not Modeled

Santa Clara	VTA	Bascom Avenue Complete Street (I-880 to Hamilton)	VTA: In Santa Clara County: Construct community-identified complete streets and safety improvements on a three-mile stretch of Bascom Avenue in Santa Clara County. Conceptual designs were developed by the Bascom Avenue Complete Streets Study. When completed, the project will close sidewalk gaps, improve crossings, add new controlled pedestrian crossings, add a Class IV separated bikeway and transit islands, construct a raised median, and add street trees and lighting safety enhancements.	SCL230221	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Santa Clara Co	Santa Clara Co Circ and Mobility Element Update	The General Plan Transportation Chapter (Circulation and Mobility Element) was last prepared and adopted in 1995. Since then, there have been significant changes in land use, housing and employment, travel behaviors and preferences, and the types of technologies we have access to today. County Goals and Policies in the existing	SCL230222	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Santa Clara	Los Gatos	Highway 17 Bicycle and Pedestrian Overcrossing	The Highway 17 Bicycle & Pedestrian Overcrossing Project proposes to construct a separate bicycle and pedestrian bridge over Highway 17 on Blossom Hill Road between Roberts Road West and Roberts Road East (just south of the existing Blossom Hill Road Bridge) to provide a new Class I facility for bicyclists and pedestrians, and to construct separated bike and ped approach trails on both sides of the new bridge.	SCL230223	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Saratoga	Citywide Master Plan for Bikeways and Sidewalks	This project proposes to create a master plan for bikeways and sidewalks in the City of Saratoga. The master plan will identify and prioritize locations for new bikeways and sidewalks and opportunities for gap closure. This project will improve	SCL230224	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Santa Clara	VTA	Transit Center Park and Ride and Bus Stop Rehab	VTA: In Santa Clara County: Rehabilitate and repair transit centers and park and ride lots as outlined in VTA's condition assessment, as well as rehabilitate and improve various bus stops.	SCL230225	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	Facilities Maintenance Equipment Program	VTA: In Santa Clara County: Replace essential shop and other maintenance equipment that has reached the end of its useful life.	SCL230226	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	Gilroy	Safe Routes to School - Christopher High School	Construct a Class I multi-use trail approximately 6,500 linear feet in length	SCL230227	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	Homestead Road Safe Routes to School	Homestead Road is a major east-west corridor that spans from Santa Clara University to Foothill Expressway traversing multi-jurisdictions including unincorporated Santa Clara County, Caltrans and the cities of Santa Clara, Cupertino, Sunnyvale, and Los Altos. This corridor is a local connection for three public schools, including West Valley Elementary School, Cupertino Middle School, and Homestead High School. The project upgrades pedestrian and bicycle infrastructure on Homestead Road between Foothill Expressway and Hollenbeck Avenue/Stelling Road. Improvements include bike paths, separated bike lanes, widened sidewalks, high-visibility crosswalks, curb ramps, and pedestrian and bicycle detection upgrades. This project will make it easier for K-12 students to travel to and from three	SCL230228	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Sunnyvale	Pedestrian and SRTS Imps in SNAIL and Braly Corner	Pedestrian and Safe Routes to School improvements at 3 intersections in SNAIL & Braly Corners neighborhoods. Intersections are Gail Ave/Gladiola Dr by Braly Elementary School, Borregas Ave/Hemlock Ave, and Borregas Ave/Duane Ave near Columbia Middle School. The improvements will include high visibility crosswalks, signing and roadway	SCL230229	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	VTA	Safety Enhancements at Grade Crossings	VTA: In Santa Clara County: Install pedestrian gates at several crossings along the light rail corridors, including automatic pedestrian gates, swing gates and railings, minor civil improvements, and related signal modifications as necessary.	SCL230230	21-T10-086	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	VTA	Light Rail Station Rehabilitation FY24-FY25	VTA: In Santa Clara County: Rehabilitate/renovate 4-6 existing light rail stations, including upgrading/repairing existing finishes, wind screens, benches, trash containers, signage, ADA accessibility, and lighting.	SCL230231	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	Fiber Optics Replacement Program	VTA: In Santa Clara County: Replace the fiber optic network on Tasman West between Whisman and Baypointe light rail stations.	SCL230232	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Santa Clara	VTA	Guadalupe Elevator and Escalator Drainage Improvem	VTA: In San Jose: Install bio-retention filter system for elevator and sump pump drainage.	SCL230233	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	Guadalupe 2nd Entrance	VTA: In Santa Clara County: Analyze the feasibility of options and develop a preliminary alignment for the recommended option for a second light rail entrance to the Guadalupe Yard from North First Street.	SCL230234	21-T01-007	Exempt (40 CFR 93.126) - Mass Transit - Rehabilitation or reconstruction of track structures, track,	Not Modeled
Santa Clara	VTA	Access Controls & CCTV Capability Expansion	VTA: In Santa Clara County: Procure and install cameras, access control hardware devices, SANs for video, as well as cabling and network infrastructure.	SCL230235	21-T07-057	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Santa Clara	Sunnyvale	City of Sunnyvale Stevens Creek Trail Extension	Extension of Stevens Creek Trail (Class 1 bike and ped facility) in Sunnyvale from Remington Drive to Fremont Avenue.	SCL230236	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Santa Clara	San Jose	San Fernando Street Mobility Hubs	This project will complete the design, environmental clearance, and construction of two small-scale mobility hubs on San Fernando Street in Downtown San José: one Urban District Hub and one Pulse Hub. Each hub includes a long-term	SCL230237	21-T08-060	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Santa Clara	VTA	Audio Frequency Train Activated Circuit (AFTAC) Re	VTA: In Santa Clara County: Assessment, engineering, and construction to address reliability concerns for the Audio Frequency Train Activated Circuit (AFTAC) on the Vasona line.	SCL230238	21-T07-057	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled
Santa Clara	VTA	Advanced Passenger Management Project	VTA: In Santa Clara County: Implement new hardware/software and applications that will help VTA paratransit customers have a safer and more enjoyable trip. Project proposes cognitive technologies to advance the Human Machine Interaction (HMI) capabilities of the Video Analytics platform.	SCL230239	21-T07-057	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Santa Clara	Palo Alto	Meadow Drive & Charleston Road Grade Separation	The project provides for the planning, design, and construction of the grade separations at the existing at grade crossings on Meadow Drive and Charleston Road in the Caltrain Rail Corridor. The project will provide improvements to accommodate bicycles, pedestrians, and vehicular movement at the crossings	SCL230240	21-T11-103	Exempt (40 CFR 93.126) - Safety - Railroad/highway crossing	Not Modeled
Santa Clara	Palo Alto	Churchill Avenue Grade Separation Project	Churchill Avenue Grade Separation Project provides for the planning, design, and construction of the grade separation at the existing at grade crossing on Churchill Avenue in the Caltrain Rail Corridor. The project will provide improvements to accommodate bicycles, pedestrians, and vehicular movement at the crossing.	SCL230241	21-T11-103	Exempt (40 CFR 93.127) - Changes in vertical and horizontal alignment	Not Modeled
Santa Clara	MTC	SR-237 Adaptive Ramp Metering Implementation	Santa Clara County: SR-237 from US-101 to I-880 adaptive ramp metering implementation. The Adaptive Ramp Metering (ARM) Implementation program offers a cost-effective path to upgrade traditionally ramp-metered congested corridors, enhancing corridor-level system management to improve corridor operational improvements.	SCL230242	21-T06-049	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Santa Clara	Palo Alto	Palo Alto SS4A Safety Action Plan	Through collaboration with diverse stakeholders, equity analysis, and consideration of low-cost, high-impact strategies citywide, the Palo Alto Safe Streets for All Action Plan will chart a path forward to enhance safety and mobility in Palo Alto. Palo Alto has a high proportion of vulnerable road users, with over 9% of commuters traveling by bike and over 40% of	SCL250201	21-T09-061	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	Saratoga	Village to Hakone Gardens Walkway Project	This project will create a walkway along State Route 9 from downtown Saratoga, "Saratoga Village," to Saratoga's traditional Japanese garden, Hakone Gardens. The walkway will require a soldier pile retaining wall along the PCC sidewalk for the first 350 feet. The remaining 450 LF of walkway will be constructed from asphalt concrete.	SCL250202	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Santa Clara	Santa Clara	Santa Clara Vision Zero Plan	Development of a City of Santa Clara Vision Zero Plan through a comprehensive traffic safety analysis. The project will include community engagement events, countermeasure recommendations, and other potential opportunities to increase	SCL250203	21-T09-061	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Santa Clara	San Jose	I-880/Montague Expwy. Interchange Improvements	Improve interchange at I-880/Montague Expressway. construct Partial Clover interchange at I-880 and Montague Expressway, including improvements on Montague. This project will provide complete street improvements.	SCL250205	21-T06-025	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Santa Clara	VTA	Palo Alto Avenue Grade Separation Project	The project provides for the planning, design, and construction of the grade separations at the existing at-grade crossings on Palo Alto Avenue/Alma Street along the Caltrain Rail Corridor. The project will provide improvements to accommodate	SCL250206	21-T11-103	Exempt (40 CFR 93.127) - Changes in vertical and horizontal alignment	Not Modeled
Solano	SolTrans	SolTrans: Bus Replacement (Alternative Fuel)	SolTrans: Eight 45' MCI commuter coaches: Replace vehicles as they reach their useful life.	SOL090034	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Solano	STA	Solano Safe Routes to School Program	Solano County: Countywide: Education & Encouragement events, includingBicycle Rodeo Equipment & Education Materials, Walk & Roll Encouragement events, marketing, walking school bus program, and program coordination through	SOL110019	21-T09-061	Exempt (40 CFR 93.126) - Other - Transportation enhancement activities (except rehabilitation and	Not Modeled
Solano	Fairfield	Fairfield-Suisun Intercity/Local Bus Replacement	Fairfield: Systemwide: Replace four (4) local/intercity buses that have exceeded their expected useful life.	SOL110041	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Solano	Solano County	Suisun Valley Bicycle and Pedestrian Imps	Solano County: At Mankas Corner: Construct staging area with bicycle and pedestrian improvements and a Class II Bike Path on Rockville Road (from Rockville Trails Park to Fairfield City Limit), Suisun Valley Road (from Fairfield City Limit to Napa County Line), Mankas Corner Road (from Fairfield City limit to Suisun Valley Road), Abernathy Road (from Suisun	SOL130007	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	Caltrans	Rio Vista SR12 Pavement Rehab and Intersection Imp	Solano County: SR12 from Currie Rd to the County Line: Rehabilitate roadway Rio Vista: At SR12/Church Rd. Intersection: Improve safety and operational efficiency. Add Standard Shoulders, EB Left Turn Lane, WB Acceleration Lane (720 ft) and Deceleration Lane (300 ft), Remove Trees in Clear Recovery Zone	SOL150003	21-T01-003	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Solano	Vallejo	Vallejo Bay Trail / Vine Trail Gap Closure	The Bay Trail/Vine Trail Gap Closure Project is the culmination of a multiyear feasibility study that investigated and evaluated multiple routes to close the gap between the Bay Trail to the south and the Bay Trail and Napa Vine Trail in	SOL170008	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	STA	Solano Mobility Call Center	Solano County: County-wide: Operate call center featuring in-person assistance for customers related to transit, commuting, and mobility services, including ADA, Clipper, and ride matching, among others	SOL170009	21-T01-001	Exempt (40 CFR 93.126) - Mass Transit - Operating assistance to transit agencies	Not Modeled
Solano	Fairfield	Grange Middle School SR2S and PavementPreservation	Fairfield: On E. Tabor Ave between Dover Ave and Clay Bank Rd, and on Sunset Ave between E. Tabor and Travis Blvd: Implement pedestrian & bicycle safety improvements and pavement maintenance improvements including the installation of colored and stamped crosswalks, the installation of rapid flashing beacons, traffic signal modifications, the replacement	SOL170010	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled

Solano	Vacaville	Vaca Valley/I505 Multimodal Improvements	Vacaville: On Vaca Valley Parkway at E Monte Vista Ave and I-505 ramps: Install roundabouts and construct bicycle/pedestrian facilities over I-505 connecting to existing facilities and ADA improvements. The project limits are east of the north I-505 ramps and west of E Monte Vista Ave.	SOL170013	21-T07-056	Exempt (40 CFR 93.127) - Intersection channelization projects	Not Modeled
Solano	Suisun City	New Railroad Avenue Pavement Rehabilitation	Suisun City: Railroad Ave from Sunset Ave to Birchwood Ct: Rehabilitate roadway on eastbound lanes Railroad Ave from Sunset Ave to Marina Blvd: Restripe existing Class 2 bicycle lanes on both sides of street, including buffer depending on	SOL170014	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Solano	Solano County	Solano County Roadway Preservation	Solano County: On Midway Road from Interstate 80 to approximately 200 feet west of Porter Road: Place asphalt overlay.	SOL170015	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Solano	Solano County	Solano County Farm to Market Phase 3	Solano County: Abernathy Road from Rockville Road to Mankas Corners Road (1.6 miles), Suisun Valley Road from Ledgewood Road to the Fairfield City Limit (2.4 miles), Rockville Road from Suisun Valley Road to Abernathy Road (1.7 miles) and Mankas Corners Road from Abernathy Road to the Fairfield City Limit (0.6 miles): Construct a total of 6.3 miles	SOL170016	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	STA	SolanoExpress Bus Electrification	Solano County: Countywide: Purchase electric over-the-road coaches for long-haul SolanoExpress routes. Original specs called for 13 electric buses, since costs have risen, the amount of buses purchases might be fewer than originally proposed.	SOL190002	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Solano	F-S Transit	Fairfield - Electric Bus Fleet and Infrastructure	Fairfield: Systemwide: Purchase Zero-emission vehicles (ZEVs), charging and electrical infrastructure upgrades, vehicle maintenance facility expansion and upgrades, and associated equipment to maintain and operate ZEVs. Project will use a combination of local, state, and federal funding sources.	SOL190003	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Solano	STA	Solano Regional Transit Improvements - TIRCP 2020	STA: Systemwide: Network Integration Planning (Real-time Transit Coordination Equipment and SolanoExpress Bus Rapid Transit Implementation and Electrification Plan) At Fairfield Transportation Center, Sacramento Valley Station, Suisun-Fairfield Amtrak Station, Walnut Creek BART Station, Vallejo Transit Center: In-Line Charging Infrastructure At the Vacaville Transit Center: Bike/ped connection and access improvements, transit signal prioritization improvements, ticketing improvements for SolanoExpress At the Fairfield-Vacaville Hannigan Train Station: Train station parking lot improvements, bike/ped connection and access improvements and At the Fairfield Transportation Center: West Texas St pedestrian connection, new SolanoExpress stop at westbound I-80 and West Texas St	SOL190023	21-T10-093	Exempt (40 CFR 93.126) - Mass Transit - Construction or renovation of power, signal, and	Not Modeled
Solano	STA	I-80/I-680/SR 12 Interchange Phase 2A	Solano County: I-80/I-680/SR-12 Interchange: Complete the construction of the I-80 connection to SR 12W that was started with the Construction Package 1. The existing eastbound SR 12W to eastbound I-80 connector will be removed. A new two-lane highway alignment and bridge structure for the eastbound SR 12W to eastbound I-80 will be constructed that meets the design requirements for future project phases. The new bridge structure will be designed to accommodate a future connector to southbound I-680. The project will construct the off-ramp from eastbound SR 12W to Green Valley Road. A braided ramp connection for eastbound I-80 to Green Valley Road and southbound I-680 will also be constructed.	SOL190024	21-T06-015	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Solano	Caltrans	Solano WB I-80 Cordelia Truck Scales	Solano County: WB I-80: Relocate Truck Scales facility 0.7 mile east from its current location. Create braided off-ramp connection and new entrance ramp connection to/from Westbound I-80 to address safety issues caused by short on-ramps leading to traffic congestion and increased risk of rear-end accidents. Create direct access to the facility from westbound State Route 12 (East). The new facility will expand capacity with seven covered inspection areas (old facility has four),	SOL190025	21-T07-055	Exempt (40 CFR 93.127) - Truck size and weight inspection stations	Not Modeled
Solano	Fairfield	Fairfield - Cadenasso Drive Paving	Fairfield: On Cadenasso Dr from west of Magellan Road to Beck Ave: Pavement preservation including using hot mix asphalt, ADA Ramp Upgrades, adjusting utilities to grade (manholes, valve boxes, monuments), add striping/pavement markings. There will also be an additive bid alternate (with local funds) for 2.5 inch mill and overlay w/fabric for Auto Mall Pkwy.	SOL210001	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Solano	Vacaville	Vacaville Pavement Preservation	Vacaville: Various Streets and Roads including Merchant St from I-80 to Camelia Way, Alamo Dr from Butcher Rd to Edgewood Dr, Alamo Dr from Buck Ave to West Monte Vista Ave, West Monte Vista from Alamo Dr to Orchard Ave, and Fruitvale from Orchard Ave to City Limits: Pavement preservation including resurface pavement, stripe, ADA improvements	SOL210002	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Solano	Vacaville	Vacaville: Electric Bus Charging Infrastructure	Vacaville: System-wide: Implement core infrastructure improvements to support the charging of a 100% Zero Emissions Bus fleet. California law mandates zero emission vehicles for future replacements. Vacaville is actively participating in an	SOL210003	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Solano	Vacaville	Vacaville: Electric Bus Fleet	Vacaville: Fleetwide: Procure 10 electric zero-emission buses in an effort to transition to an all electric fleet.	SOL210004	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Solano	Vacaville	Vacaville: Transit Building Expansion	Vacaville: Transit building: Construct addition to existing Transit building, adding offices and storage areas.	SOL210005	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled

Solano	STA	Solano Connected Mobility Implementation Plan	Solano County: Countywide: Develop a countywide Connected Mobility Implementation Plan to address how Solano reacts to the recommendations of Blue Ribbon Task Force	SOL210006	21-T10-093	Exempt (40 CFR 93.126) - Other - Planning and technical studies	Not Modeled
Solano	Vallejo	Vallejo Ferry Mobility Hub Improvement	Vallejo: In the public areas in front of the Vallejo Ferry Terminal all on the west side of Mare Island Way from the Ferry Terminal Building to the entrance of Parking Lot E: Implement mobility hub improvements based on community	SOL210007	21-EN09-132	Exempt (40 CFR 93.126) - Mass Transit - Construction of small passenger shelters and information	Not Modeled
Solano	MTC	Regional Planning Activities and PPM - Solano	Solano County: County-wide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on SOL170001	SOL210008	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Solano	Fairfield	Fairfield West Texas Street Complete Streets	Fairfield: Along West Texas St between Beck Ave and Pennsylvania Ave: Modernizes a relinquished highway to improve conditions for bicyclists and pedestrians traveling including implementing a road diet. The corridor is a primary route of local and regional significance, providing access to key community destinations including a major transit hub, downtown, a park, government services, and schools. As a Class II bike route, bicyclists share the curb lane of the 5 lane roadway with fast-moving traffic. Sidewalks are narrow and not buffered from the roadway pedestrians often cross at unmarked and unsafe locations because there are too few marked crossings. Although facilities for walking and biking exist, they are insufficient. This proposed road diet will reduce lanes for motorist and upgrade facilities for bicyclist and pedestrians. Class II bike routes will be upgraded to Class IV separated bikeways and a landscaped street buffer will be installed, marked	SOL210009	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Solano	Vallejo	Vallejo Springs Rd Pavement Preservation	Vallejo: On Springs Rd from Humboldt St. to Maywood Dr: Pavement preservation including developing and implementing a water pollution program, traffic control for street closures and detours, surveying and staking for proposed grades, remove and replace curb, gutter, sidewalk, and curb ramps, cold-milling removal of asphalt concrete, hot-mix asphalt paving, lowering and raising of existing utilities, recycling disposed materials, pavement striping, signage, relocating utilities, Capital Improvements shall include demolition, and all ancillary work associated with the work, completed in place as shown on the drawings and specifications. This project is part of an exchange of federal funds (OBAG2-SSM) from SOL170008.	SOL210010	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Solano	Vallejo	Sacramento Street Road Diet - Phase II	This project will deliver a road diet on Sacramento Street between Tennessee and Frisbee Streets. The road diet will reduce the travel lanes from 4 lanes to 2 lanes with a center turn lane and add buffered bikes lanes in both directions. The project will also bring all curb ramps along this stretch into compliance with high visibility crosswalks and slurry seal the roadway to preserve the pavement and create a blank canvas for the restriping of the roadway including red curbs and bus boxes at the Soltrans bus stops along this stretch. The Project includes the PE, Environmental	SOL230201	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Solano	Benicia	East Fifth Street PDA - Affordable Housing Streets	The City of Benicia owns a vacant piece of land in the Eastern Gateway neighborhood that it intends to sell for the purpose of affordable housing development. This property has two street frontages and the City owns significant excess right of way	SOL230202	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	Fairfield	Travis Safe Routes to School and Transit	Class I trail connecting Hannigan train station with three schools and Travis Air Force Base. Existing Markeley Lane alignment upgraded with a bidirectional Class IV cycle track.	SOL230203	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	Solano County	Solano 360 Transit Center Phase 1	Construct a Rideshare Parking lot as the first phase of the Transit/North Parking Center which will serve as a bus hub within Solano 360 with access to the County fair, and local & regional transit stops. Amenities include exterior lighting, EV charging stations, vegetated medians, and perimeter fencing. A 2-lane roadway with left turn lane, parkway landscaping,	SOL230204	21-T10-093	Exempt (40 CFR 93.127) - Bus terminals and transfer points	Not Modeled
Solano	Fairfield	Linear Park Node 4 Safe Routes to School Improveme	Complete construction of Linear Park Node 4 to include widening of the existing eight foot wide Class I off-street pathway to twelve feet, installation of pathway lighting & security cameras, and landscaping. Other State funds are AB178 state budget earmarks.	SOL230205	21-T09-061	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Solano	Fairfield	East Tabor and Tolenas Sidewalks	In Fairfield:On East Tabor Street construct new sidewalk on the north side across the railroad tracks to connect the ends of the existing sidewalk and close the sidewalk gap. Project also includes minimal roadway widening to place the sidewalk in the correct alignment, construction of curb and gutter, revised traffic striping to add class 2 bike lane, and improvements as needed for bikes to use the new pedestrian crossing across the railroad tracks. On Tolenas Avenue (east side) the sidewalk will be widened from 4 feet to 6 feet, minimum. Non-participating work includes costs to modify an existing private property access and parking lot to facilitate the new sidewalk installation alignment adjacent to UPRR right-of-way.	SOL230206	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	STA	Bike Trail Pedestrian Improvements	Bike Trail Pedestrian Improvements at three (3) trail crossings, Arlene Drive west of Arlene Way; Briarwood Drive south of Florence Drive; and Fruitvale Road between Ridgewood Drive and Parkridge Drive: Install crosswalks; Rapid Rectangular Flashing Beacons (RRFBs), and associated signing and striping.	SOL230207	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Solano	Suisun City	Park N Ride Parking Lot EV Station Installation	Project is to install three (3) Type-2 EV charging stations and one (1) Type-3 EV charging stations for a total installation of four (4) new EV charging stations in the City's Park N Ride Parking Lot. The Project Scope of Work will include: all necessary electrical underground work and electrical updates, including panel upgrades, that are required to provide the necessary infrastructure to the new EV charging stations; parking facility upgrades required to meet the current ADA	SOL230208	21-EN08-131	Exempt (40 CFR 93.126) - Air Quality - Continuation of ride-sharing and van-pooling promotion	Not Modeled
Solano	Vallejo	Vallejo Bluff Trail Project	Project proposes constructing 1.97 miles of Class I bike/ped path along SR29 under I80 between Sequoia Ave. and Sequoia Ave (east and west of I80) and another leg of the trail up the bluff above I80 and the Carquinez Bridge connecting	SOL250201	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Sonoma County	Replace Hauser Bridge over Gualala River 20C0240	In Sonoma: Bridge No.20C0240,Hauser Road Bridge over South Fork Gualala River, 5 Mi east of Seaview Road. Replace existing one-lane bridge with a new two-lane bridge	SON110025	21-T01-005	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Sonoma	Santa Rosa	Jennings Ave Bike-Ped RR Crossing Corridor	Santa Rosa: At Jennings Ave and SMART railroad tracks: Construct a bicycle and pedestrian crossing. An at grade crossing at this location would be designed to be ADA compliant and would include to the best available practices in the industry to provide appropriate warning devices in compliance with federal and State regulations. It would include gate	SON150003	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Santa Rosa	US 101 Hearn Ave Interchange	Santa Rosa: US 101/Hearn Avenue over-crossing/interchange: Replace the US 101/Hearn Avenue over-crossing/interchange with a new over crossing/interchange including bike lanes, sidewalks, and re-aligned ramps to US 101.	SON150006	21-T06-029	Exempt (40 CFR 93.127) - Interchange reconfiguration projects	Not Modeled
Sonoma	SCTA	Highway 116/121 Intersection Improvement Project	Sonoma County: Southwest of the City of Sonoma at the intersection of State Routes 116, and 121, and Bonneau Road: Improve intersection of State Routes 116 (PM 46.5/46.8) and 121 (PM 6.5/R7.0), and Bonneau Road. Project proposes to reduce congestion at intersection by installing either a roundabout or traffic signal. Other components of project would	SON150009	21-T07-056	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Sonoma	Petaluma	Petaluma: Transit Yard & Facilities Improvements	Petaluma: Transit Yard and Facility: Improvements to the Transit Yard and Facility to enhance security and maintain a state of good repair, including pavement repair and upgrades, video surveillance system, office security, yard lighting, ADA	SON170005	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Sonoma	SCTA	Sonoma County - County-Wide SRTS Program	Implement an ongoing Safety and Education Program in schools in Sonoma County, while encouraging schools to lead their own ongoing programs, with a goal of increasing active or shared modes of transportation to school.	SON170009	21-EN09-132	Exempt (40 CFR 93.126) - Other - Grants for training and research programs	Not Modeled
Sonoma	Santa Rosa	Highway 101 Bicycle and Pedestrian Overcrossing	Santa Rosa: Over Highway 101 in the vicinity of the Santa Rosa Junior College and the Coddingtown Mall: Construct a Class I shared-use ADA accessible bicycle and pedestrian bridge, which includes a 16-foot wide structure over the highway and accessible ramps	SON170012	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Sonoma County	Crocker Bridge Bike and Pedestrian Passage	Sonoma County: On existing north piers of Crocker Bridge: Construct a Class 1 bicycle and ped facility. The new Class I facility would remove a significant active transit barrier for two disadvantaged neighborhoods and provide a direct multi-	SON170014	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Petaluma	Petaluma AVL Equipment	Petaluma: Systemwide: Purchase and maintain AVL system equipment for fixed route vehicle.	SON170017	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of operating equipment for vehicles (e.g.,	Not Modeled

Sonoma	Sebastopol	Bodega Avenue Bike Lanes and Pavement Rehab	Sebastopol: On Bodega Ave between Pleasant Hill Ave and Jewell Ave: Add approximately 0.7 miles of Class II bike lanes On Bodega Ave between Pleasant Hill Ave and High St: Rehabilitate pavement. Included are new sidewalks to effect several sidewalk gap closures, plus a section of shoulder repair to ensure sufficient pavement width. There are also	SON170021	21-T01-003	Exempt (40 CFR 93.126) - Safety - Pavement resurfacing and/or rehabilitation	Not Modeled
Sonoma	Healdsburg	Healdsburg Avenue Complete Streets Improvements	Healdsburg: On Healdsburg Ave from Powell Ave to Passalaqua Rd: Construct complete streets improvements for all modes of travel including pedestrians, bicyclists, motorist, transit riders including reducing travel lanes from 5 to 3, adding bikes lanes, bus turn-outs, street parking, lighting, landscaping, LID, sidewalks, ped ramps, etc.	SON170024	21-T08-060	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Sonoma	Son Co TA	Joe Rodota Trail Bridge Replacement	Sonoma County: On the Joe Rodota Trail near the City of Sebastopol: Remove and replace two deteriorating bicycle and pedestrian bridges. Work includes installing two temporary bridges before the removal and replacement of the existing bridges, drilling new concrete piers and constructing new bridge abutments and retaining walls, lifting and placing two prefabricated bridges, and paving asphalt to match the bridge approaches	SON170025	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	SantaRosa Bus	Santa Rosa CityBus: Electric Bus Replacement	Santa Rosa CityBus: Replace diesel powered local transit buses with electric and purchase/install supporting charging infrastructure. FY17 and FY18 awards will each support the replacement of 2 buses (4 total), the FY21 award will assist in the replacement of 6 buses as well as supporting electric bus charging infrastructure, and the FY23 award will assist in replacing 6 buses and further supporting charging infrastructure.	SON170026	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Sonoma	SantaRosa Bus	Santa Rosa Transit Mall Roadbed Rehabilitation	Santa Rosa: At the Transit Mall (2nd St between Santa Rosa Ave and B St): Rehabilitate the 500ft, two-lane roadbed in the multi-transit operator (Santa Rosa CityBus, Sonoma County Transit, Golden Gate Transit, Mendocino Transit, Greyhound) Santa Rosa Transit Mall to address service disruptions, operational safety issues, and pedestrian hazards resulting from failing pavement, and will re-establish safe, accessible crossing facilities for pedestrian circulation. Project will remove top layers of roadbed materials and replace with newly rehabilitated roadway and new striping for pedestrian access. The federal awarded funding fill be transferred from FHWA to FTA for the grant award.	SON210001	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Reconstruction or renovation of transit buildings and	Not Modeled
Sonoma	Cotati	Cotati Downtown-Civic Center Connectivity Safety	Cotati: Various locations in Downtown and Civic Center: Pavement preservation and bicycle and pedestrian safety improvements. The Project rehabilitates La Plaza (inner hub street) and West Sierra Avenue and includes striping for a class 3 bike lane with buffer hatching and green bike paint at the intersections, and enhanced pedestrian crossings. The Project enhances connectivity of the City's centrally located La Plaza park and Downtown to the Community Demonstration Farm and Civic Center by repaving and restriping La Plaza and West Sierra Avenue to calm traffic and provide safe bicycle and pedestrian routes. The Project also enhances access of these points of interest from the Cotati train station and bus	SON210002	21-T09-061	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Sonoma	Sebastopol	SR 116 and Bodega Ave Pedestrian Improvements	Sebastopol: Various Locations: Construct ADA compliant ramps at four intersections along State Route 116, and pedestrian enhancements along Bodega Avenue at two uncontrolled crossings. The ADA compliant ramp work will take	SON210005	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Petaluma	Petaluma: Purchase 2 Replacement Fixed Route Buses	Petaluma: (2) 35' Battery Electric Buses: Purchase 2 Battery Electric 35' vehicles to replace (2) 35' 2007 Fixed Route Diesel buses that have expended their useful life. VIN # 15GGB271971077482 and VIN # 15GGB271071077483	SON210006	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Sonoma	MTC	Regional Planning Activities and PPM - Sonoma	Sonoma County: Countywide: Regional Planning Activities and Planning, Programming and Monitoring (PPM). Prior year funding was programmed on SON170002	SON210007	21-T07-058	Exempt (40 CFR 93.126) - Other - Planning activities conducted pursuant to titles 23 and 49 U.S.C	Not Modeled
Sonoma	Rohnert Park	Southwest Boulevard Complete Streets	Rohnert Park on Southwest Boulevard between Commerce Boulevard and 300-feet east of Adrian Drive: Pavement rehabilitation lane reconfiguration; installation of new median and sidewalks; improvement of on-street bike facilities, crosswalks and bus stop; modifications of existing sidewalks and intersections; enhancement of existing soundwall other streetscape improvements (i.e. signage, landscaping).	SON210009	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Son Co TA	Sonoma County - West County Trail Gap Closures	Sonoma County: West County Trail at a 0.20 gap along Green Valley Rd and a 0.90-mile gap Occidental Rd: Construct Class I bike path segments to close gaps in the trail. The two Class I bike path segments will parallel Green Valley Road and Occidental Road. The construction work includes the following: earthwork, 8 feet wide asphalt pavement for the trail, drainage improvements, signage, and striping.	SON230001	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Sonoma County	Todd Road and Standish Avenue Intersection Improve	The project will install a traffic signal at the intersection of Todd Road and Standish Avenue/Ghilotti Avenue where Ghilotti Avenue will be realigned to make a 4-way intersection. The project includes installation of ADA compliant curb ramps, sidewalk extensions to make an existing bus stop more accessible and installation of Class II bicycle lanes on Todd Road.	SON230202	21-T01-003	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Sonoma	Santa Rosa	Highway 101 Hearn Avenue Multi-Use Pathway and Pav	This project will 1) install a Class I separated multi-use pathway along the South side of Hearn Avenue, connecting the existing SMART multi-use pathway at the western project limits with a planned multi-use pathway on the Hearn Avenue	SON230203	21-T01-003	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Rohnert Park	Hwy. 101 Bike/Ped Overcrossing at Copeland Creek	New Class 1 bicycle/pedestrian bridge spanning 850 -1000 feet in length crossing over the US 101 freeway. Project includes environmental document, preliminary engineering, design/PS&E and construction.	SON230204	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Sonoma	Healdsburg	Healdsburg: Grove Street Neighborhood Plan Impleme	Grove Street from Grant Street to Dry Creek Avenue in the City of Healdsburg adding curb, gutter, and sidewalk where missing to create continuous ADA compliant walkways. Includes connection and improvements to two public transit stops, LID water quality features, shade trees, and traffic calming measures. This segment of Grove Street runs parallel to a Class 1 bike facility, the Foss Creek Pathway, and has access points at both ends of the project and one in the middle.	SON230205	21-T01-003	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled
Sonoma	Santa Rosa	Downtown Connectivity to Support Housing Density	This project includes traffic and transit circulation, pavement, and multi-modal improvements needed to accommodate job and housing growth in the City core. Improving the pavement surface will provide increased ride quality in the travel lanes as well as the bike lanes which is a benefit for Transit, emergency responders, scooters, cyclists, and the motoring public.	SON230206	21-T01-003	Exempt (40 CFR 93.126) - Safety - Projects that correct, improve, or eliminate a hazardous location	Not Modeled
Sonoma	Petaluma	Petaluma Paratransit Replacements	Purchase five (5) paratransit cutaways. Replace (2) 2015 24' Gas Ford E450 Cut-Away Vans and one (1) 2015 Ford E350 22' Cut-Away van with three (3) 2023 Cut-Away Vans, 5-Year, Gas, and replace two (2) 2013 24' Gas Ford E450 Cut-Away	SON230207	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Sonoma	Petaluma	Petaluma: (3) 40' Battery Electric Buses	Petaluma: (3) 40' Battery Electric Buses: Purchase 3 Battery Electric 40' vehicles to replace (2) 35' 2007 Fixed Route Diesel buses and (1) 35' 1999 Fixed Route Diesel bus that have expended their useful life.	SON230208	21-T01-002	Exempt (40 CFR 93.126) - Mass Transit - Purchase of new buses and rail cars to replace existing	Not Modeled
Sonoma	SCTA	SR 121 at 8th Street East Intersection Improvement	The proposed project would provide intersection improvements to address high commute volumes that result in insufficient gaps for left turns in and out of 8th St. E., inducing significant motorist delay and increased safety challenges. Additionally, the current intersection's lack of multi-modal facilities acts as a barrier for pedestrians, cyclists and other non-motorized users. Two alternatives are currently proposed: 1- construct a traffic signal at the subject intersection. This alternative would also construct Class II bike lanes and sidewalks along Route 121 and a Class I shared use path along 8th Street East and construct high visibility crossings and accessible pedestrian signals at the project intersection; 2- construct a modern roundabout at the subject intersection. This alternative would also construct Class II bike lanes along the approach roadways. At the intersection, this project would construct Class I shared use paths along 8th St. East and construct high	SON230209	21-T01-006	Exempt (40 CFR 93.127) - Intersection signalization projects at individual intersections	Not Modeled
Sonoma	Petaluma	Petaluma River Trail	The Petaluma River Trail is part of a larger regional vision for active transportation, connecting to and sharing alignments with the Great Redwood Trail/SMART Trail, Bay Area Ridge Trail, Bay Trail, and proposed Petaluma-Sebastopol Trail. Planned improvements include a paved multi-use trail with natural surface shoulders, viewing and seating areas, lighting, wayfinding, educational signage, and other trail amenities. The next phase of the project will focus on a key 0.5-mile gap	SON250201	21-T08-060	Exempt (40 CFR 93.126) - Air Quality - Bicycle and pedestrian facilities	Not Modeled

Appendix E. Transportation Control Measures

The original set of TCMs plus the five most recent TCMs (A-E) have been fully implemented. The TCMs were added over successive revisions to the SIP. For more information on the completed TCMs 1-28, see the Transportation-Air Quality Conformity Analysis for the 2001 Regional Transportation Plan and FY 2001 Transportation Improvement Program Amendment 01-32 (February 2002). This report can be found in the MTC-ABAG Library.

- Twelve (12) ozone measures were originally listed in the 1982 Bay Area Air Quality Plan.
- In response to a 1990 lawsuit in the federal District Court, sixteen (16) additional TCMs were subsequently adopted by MTC in February 1990 as contingency measures to bring the region back on the "Reasonable Further Progress" (RFP) line. The Federal District order issued on May 11, 1992, found that these contingency TCMs were sufficient to bring the region back on the RFP track anticipated in the SIP. These measures became part of the SIP when EPA approved the 1994 Ozone Maintenance Plan.
- Two (2) transportation control measures from the 1982 Bay Area Air Quality Plan apply to carbon monoxide control strategies, for which the region is in attainment with the federal standard, and primarily targeted downtown San Jose (which had the most significant CO problem at that time.) MTC also adopted a set of TCM enhancements in November 1991 to eliminate a shortfall in regional carbon monoxide emissions identified in the District Court's April 19, 1991, order. Carbon monoxide standards have been achieved primarily using oxygenated/reformulated fuels in motor vehicles and with improvements in the Smog Check program.
- As part of EPA's partial approval/partial disapproval of the 1999 Ozone Attainment Plan, four (4) TCMs were deleted from the ozone plan (but two (2) of these remain in the Carbon Monoxide Maintenance Plan).
- Five (5) new TCMs were adopted as part of the new 2001 1-Hour Ozone Attainment Plan and were fully funded in the 2001 TIP and 2001 Regional Transportation Plan.

With respect to TCM 2 from the 1982 SIP, there was a protracted debate, leading to a citizen's lawsuit in federal court, about the obligations associated with this TCM. On April 6, 2004, MTC prevailed in the U.S. Court of Appeals for the Ninth Circuit, which concluded that TCM 2 does not impose any additional enforceable obligation on MTC to increase public transit ridership by 15%over 1982-83 levels by November 2006 (Bayview Hunters Point Community Advocates v. Metropolitan Transportation Commission (2004 WL 728247, 4 Cal. Daily Op. Serv. 2919, 2004 Daily Journal D.A.R. 4209, 9th Cir.(Cal.), Apr 06, 2004). Thus TCM 2 has been resolved, and there are no further implementation issues to address in this TCM.

Approved TCMs in the SIP

Table 10. Original TCMs from 1982 Bay Area Air Quality Plan

TCM	Description
TCM 1	Reaffirm Commitment to 28%Transit Ridership Increase Between 1978 and 1983
TCM 2	Support Post-1983 Improvements in the Operators' Five-Year Plans and, After Consultation with the Operators, Adopt Ridership Increase Target for the Period 1983 through 1987
TCM 3	Seek to Expand and Improve Public Transit Beyond Committed Levels
TCM 4	High Occupancy Vehicle (HOV) Lanes and Ramp Metering
TCM 5	Support RIDES Efforts
TCM 6[1]	Continue Efforts to Obtain Funding to Support Long Range Transit Improvements
TCM 7	Preferential Parking
TCM 8	Shared Use Park and Ride Lots
TCM 9	Expand Commute Alternatives Program
TCM 10	Information Program for Local Governments
TCM 11[2]	Gasoline Conservation Awareness Program (GasCAP)
TCM 12[2]	Santa Clara County Commuter Transportation Program

Table 11. Contingency Plan TCMs Adopted by MTC in February 1990 (MTC Resolution 2131)

TCM	Description
TCM 13	Increase Bridge Tolls to $1.00 on All Bridges
TCM 14	Bay Bridge Surcharge of $1.00
TCM 15	Increase State Gas Tax by 9 Cents
TCM 16[1]	Implement MTC Resolution 1876, Revised — New Rail Starts
TCM 17	Continue Post-Earthquake Transit Services
TCM 18	Sacramento-Bay Area Amtrak Service
TCM 19	Upgrade Caltrain Service
TCM 20	Regional HOV System Plan
TCM 21	Regional Transit Coordination
TCM 22	Expand Regional Transit Connection Ticket Distribution
TCM 23	Employer Audits
TCM 24	Expand Signal Timing Program to New Cities
TCM 25	Maintain Existing Signal Timing Programs
TCM 26	Incident Management on Bay Area Freeways
TCM 27	Update MTC Guidance on Development of Local TSM Programs

TCM 28	Local Transportation Systems Management (TSM) Initiatives

Table 12. New TCMs in 2001 Ozone Attainment Plan

TCM	Description
TCM A	Regional Express Bus Program
TCM B	Bicycle/Pedestrian Program
TCM C	Transportation for Livable Communities
TCM D	Expansion of Freeway Service Patrol
TCM E	Transit Access to Airports

[1] Deleted by EPA action from ozone plan
[2] Deleted by EPA action from ozone plan but retained in Carbon Monoxide Maintenance Plan.
Source: Bay Area Air Quality Management District, Metropolitan Transportation Commission, 2001.

Status of Transportation Control Measures

TCMs A-E were approved into the SIP as part of EPA's Finding of Attainment for the San Francisco Bay Area (April 2004). The conformity analysis must demonstrate that TCMs are being implemented on schedule (40 CFR 93.113). TCMs A-E have specific implementation steps which are used to determine progress in advancing these TCMs (see Table 13). TCMs A-E are now fully implemented.

Table 13. Implementation Status of Approved TCMs in 2001 Ozone Attainment Plan (A – E)

#	TCM	Description	Ozone Attainment Plan Implementation Schedule	Implementation Status
A	Regional Express Bus Program	Program includes purchase of approximately 90 low emission buses to operate new or enhanced express bus services. Buses will meet all applicable CARB standards and will include particulate traps or filters. MTC will approve $40 million in funding to various transit operators for bus acquisition. Program assumes transit operators can sustain service for a five-year period. Actual emission reductions will be determined based on routes selected by MTC.	FY 2003. Complete once $40 million in funding pursuant to Government Code Section 14556.40 is approved by the California Transportation Commission and obligated by bus operators	$40 million for this program was allocated by the CTC in August 2001. The participating transit operators have ordered and received a total of 94 buses. All buses are currently in operations. TCM A is fully implemented.
B	Bicycle /Pedestrian Program	Fund high priority projects in countywide plans consistent with TDA funding availability. MTC would fund only projects that are exempt from CEQA, have no significant environmental impacts, or adequately mitigate any adverse environmental impacts. Actual emission reductions will be determined based on the projects funded.	FY 2004 – 2006. Complete once $15 million in TDA Article 3 is allocated by MTC.	MTC allocated over $20 million in TDA Article 3 funds during FY2004, FY2005, and FY2006. TCM B is fully implemented.
C	Transportation for Livable Communities (TLC)	Program provides planning grants, technical assistance, and capital grants to help cities and nonprofit agencies link transportation projects with community plans. MTC would fund only projects that are exempt from CEQA, have no significant environmental impacts, or adequately mitigate any adverse environmental impacts. Actual emission reductions will be based on the projects funded.	FY 2004 – 2006. Complete once $27 million in TLC grant funding is approved by MTC	In December 2003, the Commission reaffirmed its commitment of $27 million annually over 25 years for the TLC program as part of Phase 1 of the Transportation 2030 Plan. MTC and the county Congestion Management Agencies (CMAs) have approved over $27 million in TLC grant funding by FY 2006. In November 2004, MTC approved $500,000 for regional TLC Community Design Planning Program, and in December 2004, MTC

#	TCM	Description	Ozone Attainment Plan Implementation Schedule	Implementation Status
				approved $18.4 million in TLC funding for the regional TLC Capital program. As of December 2006, CMAs in Alameda, Marin and Sonoma counties approved an additional $12.4 million in their county-level TLC Capital programs for a regional total of $31.2 million. TCM C is fully implemented.
D	Additional Freeway Service Patrol	Operation of 55 lane miles of new roving tow truck patrols beyond routes which existed in 2000. TCM commitment would be satisfied by any combination for routes adding 55 miles. Tow trucks used in service are new vehicles meeting all applicable CARB standards.	FY 2001. Complete by maintaining increase in FSP mileage through December 2006	FSP continues to maintain the operation of the 55 lane miles of new roving tow truck coverage. This level of service was maintained through 2006. FSP continues to expand its service areas. TCM D is fully implemented.
E	Transit Access to Airports	Take credit for emission reductions from air passengers who use BART to SFO, as these reductions are not included in the Baseline.	BART – SFO service to start in FY 2003. Complete by maintaining service through December 2006	Service began June 2003. Service adjustments have been made since start of revenue service. The BART to SFO service has been maintained through 2006 and is continued. TCM E is fully implemented.

Appendix F. Methodology for Bay Area Conformity Determinations

Air Resources Board

Alan C. Lloyd, Ph.D.
Chairman
1001 I Street • P.O. Box 2815 • Sacramento, California 95812 • www.arb.ca.gov

Winston H. Hickox
Agency Secretary

Gray Davis
Governor

November 30, 2001

Mr. Wayne Nastri
Regional Administrator
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Dear Mr. Nastri:

The Air Resources Board (ARB/Board) hereby transmits the Bay Area emission factor model (SF Bay Area-EMFAC 2000) to the U.S. Environmental Protection Agency (U.S. EPA) for approval and use in the 2001 San Francisco Bay Area State Implementation Plan (Bay Area SIP) and subsequent Bay Area conformity determinations.

SF Bay Area-EMFAC 2000 is tailored specifically to the San Francisco Bay Area. The emission factors contained in SF Bay Area-EMFAC 2000, along with updated activity data from the Metropolitan Transportation Commission (MTC), provide the basis for the mobile source emissions budgets in the 2001 Bay Area SIP. SF Bay Area-EMFAC 2000 will be used for subsequent Bay Area conformity determinations. At a public meeting on November 1, 2001 the ARB Board approved SF Bay Area-EMFAC 2000 for these purposes following a 30-day public notice. At the time the Bay Area SIP was being developed, this model was the most current emission factor model available. SF Bay Area-EMFAC 2000 was based on EMFAC2000. The documentation for EMFAC2000 was publicly available beginning in May 2000 and made available for use by the Bay Area Air Quality Management District when it began developing the 2001 Bay Area SIP in November 2000.

The three Bay Area co-lead agencies responsible for developing the Bay Area SIP have committed to do a mid-course review of the Bay Area SIP by December 31, 2003 and revise the 2001 SIP by March 2004. ARB has committed to submit the revised Bay Area SIP to U.S. EPA by April 15, 2004. The mid-course review will use the most current emission factor model available at that time to develop the mobile source emissions budgets. This model will be EMFAC2001 or its successor.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: http://www.arb.ca.gov.

This transmittal provides documentation of the emission factors and activity data used in SF Bay Area-EMFAC 2000 to develop the 2001 Bay Area SIP. In addition, it includes the methodology ARB will be using to conduct Bay Area conformity determinations.

SF Bay Area-EMFAC 2000 Emission Factor Model Documentation

Comparison between MVEI7F/7G and SF Bay Area-EMFAC 2000

The emission factors used in the SF Bay Area-EMFAC 2000 emission factor model represent a major improvement over emission factors used in older models such as MVEI7F and MVEI7G. SF Bay Area-EMFAC 2000 exhaust hydrocarbon emission rates are significantly higher than the emission rates included in the older models. The increase in exhaust hydrocarbon rates is mainly a result of the following changes:

- More accurately reflecting real-world driving by using the Unified Cycle (UC) driving cycle rather than the Federal Test Procedure (FTP);
- Using new speed adjustment factors to better reflect how emissions change as average driving speeds change;
- Representing 45 model years, rather than only 35; and
- Incorporating new vehicle test data.

Evaporative hydrocarbon emission rates in SF Bay Area-EMFAC 2000 are also significantly higher than the older models' emission rates. The most important changes causing the increase in evaporative hydrocarbon emission rates include:

- Higher hot soak emission rates, especially for older catalyst-equipped vehicles;
- Higher running loss emission rates, based on new data; and
- Including emissions for vehicles with liquid fuel leaks.

Emission rates for oxides of nitrogen (NOx) are also significantly higher in SF Bay Area-EMFAC 2000 than in the older models. The increased estimates of NOx emission rates are primarily due to the following changes:

- Inclusion of "off-cycle NOx" (i.e., NOx emissions that were not represented in the certification driving cycle); and
- Incorporation of new vehicle test data for catalyst equipped passenger cars and light trucks.

Incorporation of Latest Standards

SF Bay Area-EMFAC 2000 also includes the effects of recently adopted standards on the emissions of the on-road fleet. The future year emission rates in SF Bay Area-EMFAC 2000 reflect the adopted standards described below.

<u>Supplemental Federal Test Procedure</u>
Two supplemental test procedures to the FTP were adopted by the Board in July of 1997. These new standards are applicable to passenger cars, light-duty trucks, and medium-duty vehicles weighing 8,500 pounds or less. These standards require the

control of excess emission of hydrocarbon and oxides of nitrogen during “off-cycle” operations (high speed and hard acceleration), and excess emissions associated with the use of air conditioning. The new standards are to be phased-in between 2001 and 2005.

Low Emission Vehicles (LEVII)

The second phase of Low Emission Vehicle Standards (LEVII) was adopted by the Board in November of 1998. This action imposed more stringent hydrocarbon, carbon monoxide, NOx and exhaust particulate matter emissions standards for passenger cars, light-duty trucks and medium-duty vehicles up to 14,000 pounds sold in California beginning in 2003.

Near Zero Evaporative Standards

Also in November 1998, the Board adopted new standards for the emissions of evaporative hydrocarbons (diurnal, hot soak and resting loss). The standards were reduced from 2 grams per test (hot soak plus diurnal) for passenger cars, to 0.5 grams per test.

New On-Road Motorcycle Standards

In December of 1998, the Board adopted lower exhaust emission standards for on-road motorcycles. These standards, which may require future motorcycles to utilize catalytic converters, are applicable to new motorcycles sold in California beginning in 2004.

Off-Cycle NOx Mitigation

In a settlement reached between the federal government, the Air Resources Board and heavy-duty engine manufacturers, several mitigation measures were agreed to regarding off-cycle NOx emissions. In addition to ending the practice of defaulting to an advanced timing condition during extended cruise operation, several manufacturers have agreed to perform “low emission” rebuilds for in-use engines. These rebuilds will lower the emissions of the in-use fleet.

New Exhaust Emissions Standards for Urban Transit Buses

In February of 2000, the Board adopted a regulation that allows transit agencies the choice between either a diesel or alternative fuel “path” to lower emissions. Beginning in 2002, over the course of 10 years, this regulation requires increased introduction of

cleaner engine buses in transit agencies' fleets, use of cleaner diesel fuel, retrofits to reduce exhaust particulate matter (PM) emissions from older diesel buses, and use of zero-emission buses (ZEBs).

Public Review

The emission factors used in SF Bay Area-EMFAC 2000 were developed in a 3-year process and were subject to public review and comment during three workshops held in 1998, 1999, and 2000. Throughout the comment period, ARB received a number of written and verbal comments, which were addressed in the development of the emission factor model.

Further detail regarding the development of the SF Bay Area-EMFAC 2000 emission factor model may be found in the attached Technical Support Documentation. The Technical Support Documentation refers to broader work on the statewide EMFAC2000 emission factor model, but also applies to the region specific SF Bay Area-EMFAC2000.

Activity Data Documentation

The Bay Area vehicle miles traveled (VMT), VMT growth rates, and VMT-speed distributions incorporated into SF Bay Area-EMFAC 2000 represent the best current activity data estimates available. The derivation of these estimates are explained below.

Vehicle Miles of Travel

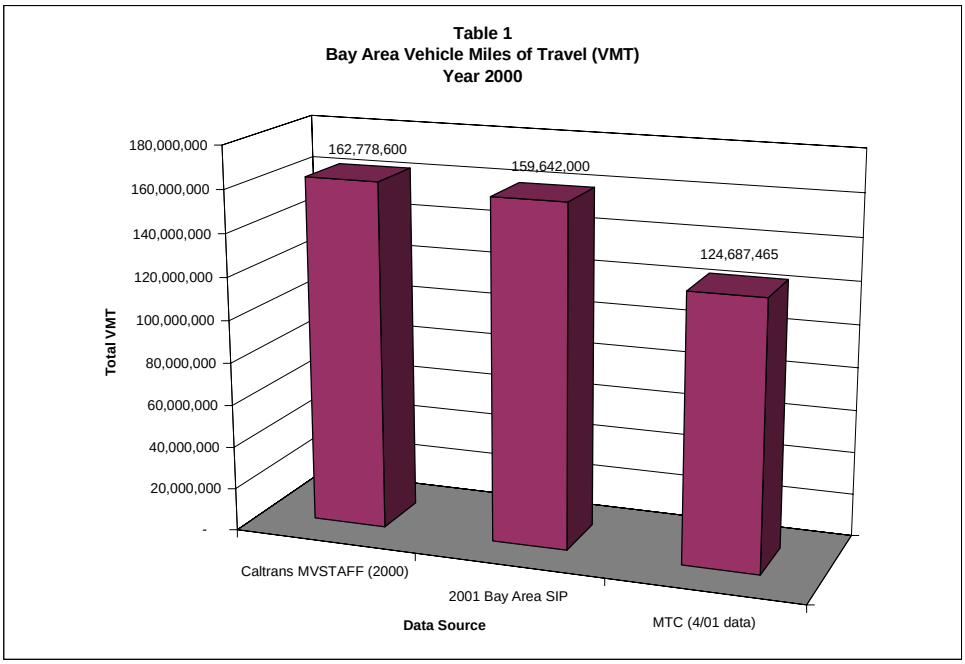
Bay Area VMT estimates for calendar year 2000 are based on the ARB VMT estimation methodology using mileage accrual rates derived from Smog Check odometer data and Department of Motor Vehicle vehicle populations (see Section 7 of the attached Technical Support Documentation for further detail on the ARB VMT estimation methodology).

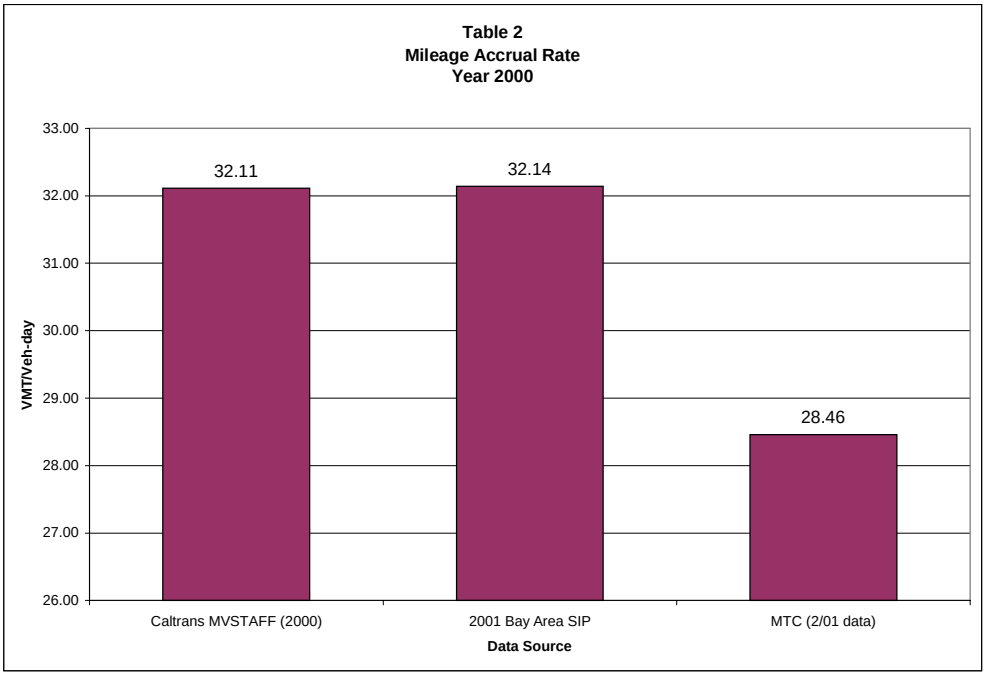
The decision to use ARB's VMT estimate instead of the VMT estimate from MTC's BAYCAST-90 travel demand model for calendar year 2000 was made in an agreement between MTC and ARB. As Table 1 illustrates, MTC's 2000 VMT estimate for the region is about 22 percent lower than both ARB and Caltrans' estimates. The ARB and Caltrans[1] methods for estimating VMT were developed independently of each other, yet fall within 1 percent of each other.
Additional justification for using the ARB VMT estimation methodology is found in the estimate of the number of miles driven by each vehicle per day (i.e., the mileage accrual

[1] Caltrans' VMT estimate was taken from the annual "Motor Vehicle Stock, Travel, and Fuel Forecast" (MVSTAFF) report. The MVSTAFF report forecasts statewide VMT based on statewide vehicle population data from the DMV, fuel consumption estimates from the Board of Equalization, and fuel economy estimates derived from the national fuel economy standards. Statewide VMT estimates are then disaggregated to the county level using county auto registration and road system mileage ratios.

rate). Table 2 compares mileage accrual rates from various data sources. MTC's estimates appear too low to be consistent with odometer readings collected in the Smog Check program. MTC's mileage accrual estimates are 11 percent lower than both Caltrans' ARB's estimates for the Bay Area.

For the purposes of the 2001 Bay Area SIP, MTC agreed to use ARB's 2000 VMT estimate. It was also agreed that the difference in VMT between ARB's and MTC's calendar year 2000 VMT estimates would be used as a "correction" for all future analysis years.





VMT Growth Rates

In the agreement between ARB and MTC, ARB agreed to use MTC's VMT growth rate as implied by the VMT estimates produced by BAYCAST-90. The rationale for this is that while ARB questions the level of travel in calendar year (CY) 2000 as estimated by MTC's travel demand model, ARB is not questioning future year growth projections included in the travel demand model.

VMT-Speed Distributions

The final pieces of activity data provided by MTC and incorporated into SF Bay Area-EMFAC 2000 are the VMT-speed distributions for two calendar years (2000 and 2005). Based on consultation between MTC and ARB staff, ARB incorporated the VMT-speed distributions into SF Bay Area-EMFAC 2000 by applying CY2000 speed distributions to CYs 2000-2003, and CY2005 speed distributions to CYs 2004+.

Methodology for Bay Area Conformity Determinations

For all Bay Area conformity determinations based on the mobile source emissions budgets set in the Bay Area SIP (using SF Bay Area-EMFAC 2000), the following step-wise methodology will be followed:

1. MTC will submit to ARB updated VMT-speed distributions and updated VMT estimates by county for all relevant analysis years. ARB will follow the procedures below for analysis years for which MTC does not submit new activity data (i.e. for which activity data does not change from MTC's original SIP submittal):
    - ARB will use the speed distributions submitted by MTC for the most recent calendar year prior to the analysis year of interest. For example, if MTC submits new VMT-speed distributions for 2005 and 2010, but not for the 2006 analysis year, the 2006 analysis year will use the speed distributions submitted for 2005. VMT-speed distributions will not be interpolated.
    - The VMT estimate for each county will be interpolated using county-specific compounded growth rates.[2] The interpolated VMT will then be used for the following steps.

2. ARB will calculate VMT for the portions of Sonoma and Solano Counties that fall in the San Francisco (S.F.) Air Basin. This is necessary since the SIP budgets are based on the S.F. Air Basin (which covers only the southern portions of Solano and Sonoma Counties), while the MTC VMT estimates include the full nine Bay Area counties. The county portions will be calculated by multiplying the full county VMT submitted by MTC by the VMT ratio (partial county/county) derived from SF Bay Area-EMFAC 2000.[3] In year 2000, about 71 percent of Solano County, and 77 percent of Sonoma County VMT occurred in the S.F. Basin.

3. ARB will calculate the year 2000 difference in VMT between the VMT estimate included in the SF Bay Area-EMFAC 2000 runs[4] and the VMT estimate submitted by MTC for conformity.[5] The resulting differences by county represent the VMT "correction" between ARB and MTC's VMT estimates.

4. The VMT correction will be added by county to the submitted VMT for all analysis years, resulting in the "target" VMT estimate that will be used for the conformity modeling runs.[6]

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[2] For example, 2006 VMT is interpolated from 2005 and 2010 VMT estimates submitted by MTC by the following equation: $VMT_{2006} = (VMT_{2010} / VMT_{2005})^{0.2} * VMT_{2005}$

[3] For the S.F. Basin portions of Solano and Sonoma County VMT:
S.F. Basin County Portion VMT_{MTC} = [S.F. Basin County Portion $VMT_{SFBayArea\text{-}EMFAC2000}$ / Total County VMT $_{SFBayArea\text{-}EMFAC2000}$] * Total County VMT_{MTC}

[4] SF Bay Area-EMFAC 2000 calculates VMT based on Smog Check odometer readings and DMV vehicle registration data for light duty vehicle classes, and instrumented truck data for the truck classes.

[5] VMT $correction_{county\ a}$ = SIP VMT_{CY2000} – MTC VMT_{CY2000}

[6] Target $VMT_{county\ a}$ = MTC $VMT_{county\ a}$ + VMT $correction_{county\ a}$

5. The county-specific target VMT in the conformity modeling runs will be achieved in SF Bay Area-EMFAC 2000 by modifying the county-specific vehicle populations in SF Bay Area-EMFAC 2000 using the What-if-Scenario (WIS) option. Since vehicle population and VMT are linearly related in SF Bay Area-EMFAC 2000, to obtain the "target" vehicle population, ARB staff will take the ratio between the SIP VMT estimates and the target VMT for each analysis year and apply them to the SIP vehicle population estimates for each respective analysis year.[7]

6. Once the target vehicle populations have been calculated, ARB staff will run SF Bay Area-EMFAC 2000 using the WIS option to adjust vehicle populations by county, and incorporate any updated speed distributions.

7. ARB staff will then apply control factors to the model output to adjust for emission reduction measures not included in the SF Bay Area-EMFAC 2000 emission factor model or changed since the model was developed.

8. Finally, ARB staff will compare the results to the SIP budgets for the conformity demonstration.

If you have questions regarding this submittal, you may contact me at (916) 445-4383, or have your staff contact Ms. Cynthia Marvin, Chief of the Air Quality and Transportation Planning Branch, at (916) 322-7236.

Sincerely,

/s/

Michael P. Kenny
Executive Officer

Enclosures

cc: See next page.

[7] Target Veh Pop = [((Target VMT – SIP VMT) / SIP VMT) * SIP Veh Pop] + SIP Veh Pop

cc: (w/o Enclosures)
Mr. Jack Broadbent, Director
Air Division
U.S. Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, California 94105

Ms. Ellen Garvey, Executive Officer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, California 94109

Mr. Steve Heminger, Executive Director
Metropolitan Transportation Commission
101 Eighth Street
Oakland, California 94607

Mr. Eugene Leong, Executive Officer
Association of Bay Area Governments
101 Eighth Street
Oakland, California 94607

Ms. Cynthia Marvin
Air Resources Board

January 2003

Recommended Methods for Use of EMFAC2002 To Develop Motor Vehicle Emissions Budgets and Assess Conformity

As the agency charged with estimating motor vehicle emissions for air quality plans, the Air Resources Board (ARB) has improved the EMFAC modeling tool for use in combination with estimates of vehicle population and activity to develop motor vehicle emissions budgets and assess transportation conformity. The most recent version of this tool, EMFAC2002, has been transmitted to the U.S. Environmental Protection Agency (U.S. EPA) for approval for use in State Implementation Plans (SIPs) and conformity assessments. This paper describes the recommended practices for ARB, air districts, metropolitan planning agencies (MPOs) and regional transportation planning agencies (RTPAs) to use vehicle activity in conjunction with EMFAC2002 emission rates to calculate emissions budgets and conduct conformity assessments.

The vehicle activity indicators commonly used to develop emissions inventories are vehicle trips and vehicle miles of travel (VMT) by speed, vehicle class and time of day. Though not a direct measure of travel activity, vehicle population may also be a variable for these purposes, as described below.

Vehicle trips. In California, MPOs and RTPAs use demographic forecasts and travel demand models to develop estimates of current and future daily VMT, daily vehicle trips and average travel speeds for links in the transportation network. ARB separately estimates daily vehicle trips, but defines trips as the number of times a vehicle is started, rather than a number of specific daily destinations. This distinction is important; ARB and U.S. EPA studies find that vehicles are started five to six times per day, while trips associated with destinations as reported through travel surveys and predicted in travel demand models occur three to four times per day. Because start emissions and the duration of time between starts are crucial to emissions estimation, ARB equates vehicle trips with vehicle starts. Though EMFAC2002 permits model users to alter estimates of vehicle trips used to estimate emissions, ARB recommends that the model's default estimates of vehicle trips (starts), developed from instrumented vehicle studies, be used for air quality planning and conformity purposes.[1] Alternatively, for vehicle classes where appropriate local data are made available for review through the interagency consultation process, use of trip factoring or other methods to fully account for vehicle starts may be employed. Such alternative approaches should be discussed in the interagency consulation process.

[1] An exception would occur when a user chooses to factor these start-based trips to account for trip reduction programs. EMFAC2002 start-based trips rather than destination-based trips should serve as the baseline for this adjustment. The adjustment would be made through the What-If Scenario (WIS) function of EMFAC2002 as follows, where TRS denotes the trip reduction scenario:

*WIS Input TRS Trips = EMFAC Default Trips * (RTPA TRS Trips / RTPA Baseline Trips)*

Vehicle speeds. Most travel demand models provide output of estimated average speed by time period and link that may be summarized for use in EMFAC2002. For each major vehicle class and up to 24 hourly time periods, total VMT is divided into 13 different speed "bins" (5 mph through 65 mph) and used as input to EMFAC2002. ARB recommends continuation of this current practice to develop emissions budgets and assess conformity. Travel from intrazonal trips should be assigned to the appropriate speed bin based on the speed assigned to that travel in the travel demand model. VMT for each speed bin and time period can be used as input through the WIS function of EMFAC2002. It is also possible to input this data specific to vehicle class if adequate and defensible local data are available.

Vehicle population. Vehicle trips (starts) in EMFAC2002 are estimated as a function of the number of vehicles, or vehicle population, by county. The population of each class of motor vehicle is estimated and forecast from Department of Motor Vehicles (DMV) registration data. EMFAC2002 assumes there is a relationship between vehicle population and VMT, carried through mileage accrual rates.[2] In the default case, the model assumes *vehicle population * mileage accrual = VMT.* ARB-preferred practice is to maintain this internal consistency, for reasons explained below.

Vehicle miles of travel. Daily VMT is both an emissions model input usually provided by MPOs/RTPAs and a model output used to estimate exhaust emissions. ARB staff reviews MPO/RTPA estimates of VMT and vehicle speeds, and supports these estimates for use in air quality plans whenever we agree they are reasonable and defensible. Use of the latest estimates of MPO/RTPA VMT and speeds in plan development facilitates the subsequent federal transportation conformity process. This is particularly important for any year for which the plan creates emissions budgets, as conformity rules allow no emissions budget exceedance, regardless of how small. As there may be some variance between default EMFAC2002 VMT and more recent MPO/RTPA estimates to be used for SIP development, we are recommending a procedure to more exactly incorporate into emissions budgets revised VMT estimates for emissions budget analysis years.

Although it is possible to directly input VMT into EMFAC2002 through the model's WIS function, it is generally not recommended to do this independent of vehicle population because of the desire to properly estimate start and evaporative emissions tied to the size of the vehicle fleet. A change in total forecasted miles of travel implies a change either in the number of vehicles traveling those miles or in mileage accrual rates. For future years, we generally recommend making vehicle population the variable, rather than mileage accrual. Thus, VMT adjustment would usually occur through vehicle population adjustment in the model's WIS function, according to this formula:

*WIS Input Population = EMFAC Default Population * (RTPA VMT / EMFAC Default VMT)*

[2] Accrual rates are miles traveled per year as a function of vehicle age, derived from the Bureau of Automotive Repair Smog Check database as described in Section 7.1 of the EMFAC2000 Technical Support Document, found via http://www.arb.ca.gov/msei/on-road/latest_revisions.htm#pcaccrual.

The result of this modification is that emissions estimates more precisely incorporate the daily VMT provided by each MPO/RTPA to calculate exhaust emissions, and vehicle population is adjusted for consistency with this assumption of higher or lower VMT, providing similarly modified start and evaporative emissions.[3] Though the emissions impact of using this approach will often be small, we believe the approach is appropriate given the desire to fully reflect the impacts of changes in travel activity on all emissions processes. Use of consistent methods in air quality plans and conformity assessments will both reduce potential conformity problems and preserve the integrity of the SIP and conformity processes.

Alternatively, local data may indicate that changes in VMT are tied more closely to changes in household or business rates of travel than to changes in vehicle ownership. Or, improved travel demand modeling may project auto ownership rates with a high degree of confidence. In such cases it may be appropriate to adjust total mileage accrual rather than vehicle population. It is also possible to derive a modified VMT forecast from adjustments to both variables in EMFAC2002. Planning agencies are encouraged to present alternative approaches for consideration in the interagency consultation process.

Recommendations

1. ARB recommends that the EMFAC2002 default estimates of vehicle trips, based on starts per day, be used for SIP development and conformity purposes. Model defaults for trips may be factored to account for trip reduction scenarios, but should not be replaced with estimates that do not account for all vehicle starts. Alternative approaches, such as the factoring of travel demand model trip outputs for appropriate classes to account for additional starts, may be considered through interagency consultation.

2. We recommend continuation of current practices for input of latest speed distributions for SIPs and conformity assessments. Travel from intrazonal trips should be assigned to the appropriate speed bin based on the speed assigned to that travel in the travel demand model.

3. To fully reflect the impacts of modified VMT forecasts on all emissions processes, in the calculation of SIP emissions budgets, and in the assessment of conformity with those budgets, vehicle population should be adjusted in EMFAC2002 proportional to the estimated VMT change. Local circumstances may alternatively support adjustment of mileage accrual rates, subject to interagency consultation.

[3] After adjusting VMT through use of the population variable in the WIS function of EMFAC, a user who desires to match VMT even more exactly (to the mile instead of the tens of miles) can then adjust VMT in the WIS without disturbing the population adjustment. This is unlikely to have a discernible impact on emissions, however.

Appendix G. EMFAC Adjustment Factor Methodology and Correspondence

Attachment A

EMFAC Off-Model Adjustment Factors to Remove Emissions Benefits of Advanced Clean Trucks, Zero-Emission Airport Shuttle, Warranty Phase 1, and Heavy-Duty Omnibus Regulations

I. Summary

On June 12, 2025, three Congressional Resolutions purported to disapprove U.S. EPA's decisions to grant California waivers for several regulations in the EMission FACtors (EMFAC) 2021 v1.0.2 baseline, including Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Heavy-Duty Omnibus (Omnibus) regulations.[1] While those illegal actions are being contested, CARB staff are providing factors to remove these regulations from EMFAC2021 v1.0.2 solely for the purposes of State Implementation Plan (SIP) development and conformity determinations, including regional emissions analysis for transportation plan and transportation improvement program conformity determinations, as well as as hot-spot analysis for project-level conformity determinations. The off-model adjustment factors are listed in the attached Appendix A to remove ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus emissions reductions from the EMFAC2021 v1.0.2 baseline.

II. Background on EMFAC

EMFAC is California's federally approved on-road mobile source emissions inventory model that reflects California-specific driving and environmental conditions, fleet mix, and vehicle emissions, including those resulting from California's mobile source regulations. The EMFAC model supports CARB's regulatory and air quality planning efforts and fulfills the federal Clean Air Act and the Federal Highway Administration's transportation planning requirements. On November 15, 2022, U.S. EPA approved EMFAC2021 v1.0.2 for use in SIP development and conformity analyses, with EPA noting that it would not be able to approve SIPs based on EMFAC2021 until the adopted regulations in the EMFAC2021 v1.0.2 baseline had received waivers from EPA and been approved in the California SIP. This model accounts for the effects of regulations that were approved by the Board as of the release of EMFAC2021 v1.0.2 on January 15, 2021.

[1] Other affected regulations include Zero-Emission Powertrain Certification and Advanced Clean Cars II. Zero-Emission Powertrain Certification does not affect pollutant emissions, and Advance Clean Cars II was adopted after the release of EMFAC2021.

III. Descriptions of ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus

The EMFAC2021 v1.0.2 baseline includes the effects of a number of regulations, including ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus. Descriptions of all regulations are provided below.

ACT:[2] ACT was approved by CARB's Board in June 2020. The California Office of Administrative Law (OAL) then approved ACT with an effective date of March 15, 2021. This regulation requires manufacturers of Class 2b-8 chassis or complete vehicles with combustion engines to sell an increasing percentage of zero-emission trucks in their annual California sales starting in 2024. By 2035, zero-emission truck or chassis sales would need to be 55 percent of Class 2b–3 truck sales, 75 percent of Class 4–8 vocational truck sales, and 40 percent of Class 7-8 tractor truck sales. This regulation reduces emissions from trucks model year 2024 and newer.

Zero-Emission Airport Shuttle:[3] Zero-Emission Airport Shuttle was approved by CARB's Board in June 2019. OAL then approved the regulation in January 2020. This regulation requires airport shuttle fleets to fully transition to zero emission by 2035. No additional reductions were credited beyond ACT.

Warranty Phase 1:[4] CARB adopted amendments to the heavy-duty engine (Gross Vehicle Weight Rating, or GVWR, above 14,000 lbs.) warranty regulation in 2018. The California OAL then approved this regulation on June 12, 2019. This regulation reduces NOx and particulate matter (PM) emissions from heavy-duty engines model year 2022 and newer.

Omnibus:[5] Omnibus was approved by CARB's Board in August 2020. The California OAL then approved Omnibus with an effective date of December 22, 2021. This regulation comprehensively updates heavy-duty engine NOx emissions standards and provides additional requirements for engines to remain clean throughout their lifetime. This regulation primarily reduces NOx emissions from trucks with engines that are model year

[2] CARB. (2021). Advanced Clean Trucks Regulation, *https://ww2.arb.ca.gov/rulemaking/2019/advancedcleantrucks*.
[3] CARB. (2020). Zero-Emission Airport Shuttle Regulation, *https://ww2.arb.ca.gov/rulemaking/2019/asb19*.
[4] CARB. (2019). Heavy-Duty Warranty Amendments, *https://ww2.arb.ca.gov/rulemaking/2018/hd-warranty-2018*.
[5] CARB. (2021). Heavy-Duty Omnibus Regulation, *https://ww2.arb.ca.gov/rulemaking/2020/hdomnibuslownox*.

2024 and newer. Additionally, this regulation further lengthens the warranty requirement beyond Warranty Phase 1 for engine model years 2027 and newer.

IV. Methods for Removing Emissions Reductions of ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus from EMFAC2021

To remove the impact of ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus regulations on criteria pollutant emissions, CARB staff used the methodology implemented in the latest U.S. EPA-approved version of the EMFAC model, EMFAC2021 v1.0.2. Using the "Annual" setting, the model was run for calendar years 2022 through 2050 to estimate emissions under two scenarios:

1. **Remove Regulations** scenario where emissions are estimated without accounting for the benefits of the ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus regulations. This scenario was developed using a custom internal version of the model with targeted adjustments. Changes to estimation methods and results for each are listed below.
    - ACT and Zero-Emission Airport Shuttle:
        - ACT zero-emission sales for medium- and heavy-duty (Class 2b-8) model year 2024 and newer vehicle population and vehicle miles traveled forecasts, which includes airport shuttles required as part of the Zero-Emission Airport Shuttle regulation, are removed; no zero-emission vehicles in these weight classes assumed, maintaining the model's 2019 base year.[6]
        - Outputs show increased tailpipe (all pollutants) and brake wear PM emissions.
    - Warranty Phase 1
        - Heavy-duty (Class 4-8) California-certified heavy-duty model year 2022 and newer engines are assumed to have baseline warranty requirement of 100,000 miles.
        - Removed adjustments for Phase 1 lengthened warranty, and, therefore, emission deterioration rates are based on in-use emissions test data of 0.2 g/bhp-hr NOx certified engines that are not affected by this regulation.
        - Outputs show increased tailpipe NOx and PM emissions.

[6] The adjustment factors for heavy-duty ZEVs are 0, except for the UBUS (transit bus) category, where adjustment factors are equal to 1.0, reflecting the 2019 base year where it is assumed there are no heavy-duty ZEVs other than UBUS. Because vehicle population forecasts stay constant, the brake and tire wear emissions from ZEVs shift to combustion vehicles when ACT is removed and are therefore appropriately accounted for.

- Omnibus:
  - Heavy-duty (Class 4-8) California-certified heavy-duty model year 2024 and newer engines are assumed to meet prior California engine emissions standards (*i.e.*, 0.2 g/bhp-hr NOx standard).
  - Removed reduction factors reflecting Omnibus requirements[7] that are applied to baseline emission rates. Baseline emission rates default to in-use test data from 0.2 g/bhp-hr NOx certified engines.
  - Outputs show increased tailpipe NOx and PM emissions.

2. **Include Regulations** scenario where the benefits of ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus regulations, in addition to all other adopted regulations when the model was finalized, are reflected when estimating emissions. This is the same scenario as presented in the public version of the EMFAC2021 v.10.2 model. More details on how these regulations were incorporated into the model can be found in the EMFAC2021 Technical Documentation.[8]

The emissions results from these two scenarios were used to assess the increase in emissions from removing ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus and derive the adjustment factors presented in Appendix A. The adjustment factors for each calendar year, vehicle category, fuel type and pollutant (described further below) were calculated based on the following equation:

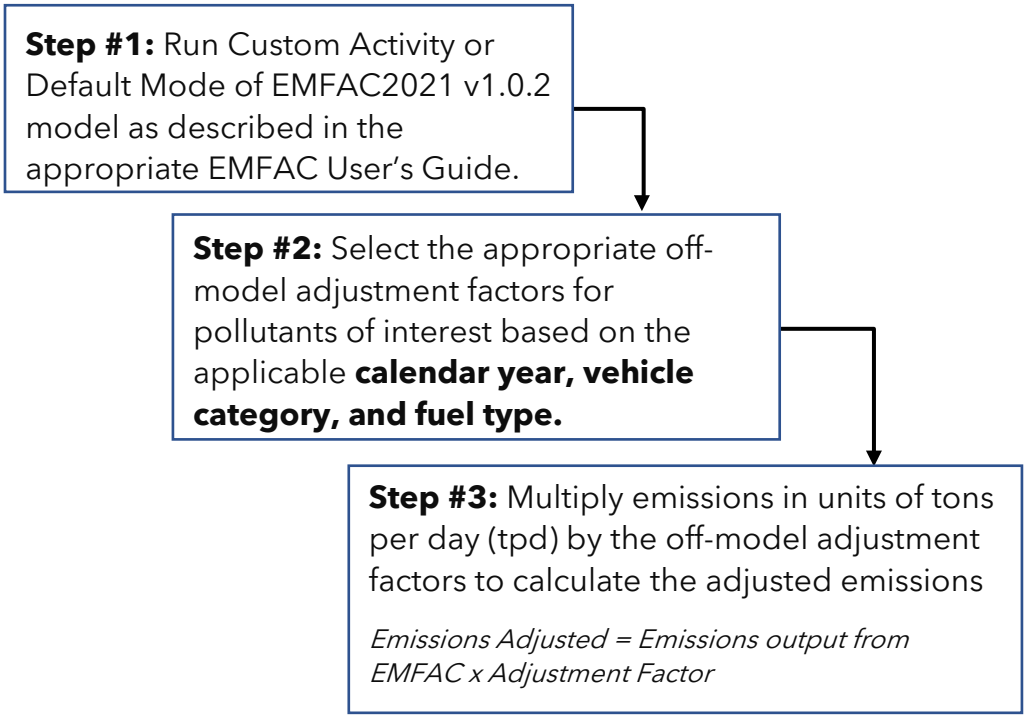
Adjustment factors = Remove Regulations emissions / Include Regulations emissions

[7] Includes tightened Federal Test Procedure (FTP), new load certification cycle (LLC), tightend idling standards, improvements to the existing heavy-duty in-use testing program (HDIUT), improvements to the durability demonstration program (CCP), lengthened warranty and useful life (UL) mileages, and amendments to the emissions warranty information reporting (EWIR) program and corrective action procedures.
[8] CARB. (2021). EMFAC2021 Technical Documentation. EMFAC2021 Volume III Technical Document, *https://ww2.arb.ca.gov/sites/default/files/2021-03/emfac2021_volume_3_technical_document.pdf*.

V. Application of Off-Model Adjustment Factors

The off-model adjustment factors for EMFAC2021 v1.0.2, prepared using the methods described above, are tabulated in Appendix A. These factors apply to NOx, ROG, PM2.5, and PM10 emissions for each calendar year, vehicle category, and fuel type in EMFAC2021 v1.0.2. The flowchart illustrated in Figure 1 details the methodology to apply these adjustment factors.

Figure 1. Process to apply EMFAC2021 v1.0.2 off-model adjustment factors[9]



Contact

For questions regarding the EMFAC off-model adjustment factors, please contact us at: *EMFAC@arb.ca.gov*

[9] Custom Activity (SG) mode is available using the EMFAC2021 v1.0.2 desktop application, or the EMFAC2021 v1.0.2 web database: https://arb.ca.gov/emfac/scenario-analysis/.

REGION 9
SAN FRANCISCO, CA 94105

November 21, 2025

Edie Chang
Deputy Executive Officer
California Air Resources Board
1001 I Street
Sacramento, California 95812

Dear Deputy Executive Officer Chang,

Thank you for your letter of October 31, 2025, requesting U.S. Environmental Protection Agency (EPA) approval of EMission FACtors (EMFAC) model version EMFAC2021 off-model adjustment factors that remove the estimated emissions benefits attributed to California's Advanced Clean Trucks (ACT), Zero-Emission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Heavy-Duty Omnibus (Omnibus) regulations from EMFAC2021. The EMFAC off-model adjustment factors are multipliers that would be applied to vehicle emissions modeled by EMFAC2021. With this letter, the EPA is approving the use of EMFAC2021 with these adjustment factors for the Clean Air Act (CAA) purposes of State Implementation Plan (SIP) development and conformity determinations.

Background

In May 2025, the Congress enacted joint resolutions of disapproval under the Congressional Review Act for preemption waivers that the EPA had previously issued pursuant to CAA section 209, including for the ACT, Zero-Emission Airport Shuttle, Warranty Phase 1, and Omnibus regulations.[1] President Trump signed the resolutions into law on June 12, 2025.[2] Each resolution provides that the corresponding waiver "shall have no force or effect."[3] As a result, the EPA's prior preemption waivers for these regulations have no force or effect. Accordingly, these regulations are preempted by the CAA, meaning that California can no longer enforce or attempt to enforce the regulations and that estimated emissions reductions attributed to the regulations cannot be used for the CAA purposes of SIP development or conformity determinations.

[1] *See* H.R.J. Res. 87; and H.R.J. Res. 89.
[2] *See* Pub. L. 119-15, 139 Stat. 65 (June 12, 2025); Pub. L. 119-17, 139 Stat. 67 (June 12, 2025). Congress similarly enacted a resolution of disapproval of EPA's waiver for the Advanced Clean Cars II (ACC II) Regulation. *See* H.R.J. Res. 88. President Trump signed this resolution into law as well. *See* Pub. L. 119-16, 139 Stat. 66 (June 12, 2025). EMFAC2021 does not purport to account for emissions reductions from ACC II.
[3] *Id*.

EPA's approval

The EMFAC2021 on-road motor vehicle emissions model, which the EPA approved for SIP development and transportation conformity in California in 2022,[4] includes estimated emissions reductions attributed to the regulations listed in your October 31, 2025 letter. The EPA approved the model in 2022 based on the understanding that the measures had "already been adopted by the enforcing jurisdiction," per 40 CFR 93.122(a)(3)(i), and that it was therefore appropriate to include emissions reductions from these measures in the emissions analysis. Because the preemption waivers for these regulations no longer have force or effect, as described above, the regulations cannot be implemented or enforced, and it is no longer appropriate to describe them as being "adopted by the enforcing jurisdiction."

With the approval of the adjustment factors in this letter, EMFAC2021 with the adjustment factors, is the latest approved method for modeling emissions available in California, per 40 CFR 93.111. Emissions estimates in SIP submittals, analyses for transportation plan and transportation improvement program (TIP) conformity determinations, and hot-spot analyses for project-level conformity determinations must be based on EMFAC2021 with these adjustment factors, so that emissions estimates for these CAA purposes do not include the effects of these regulations.[5]

Nothing in this letter should be understood as stating the EPA's position on the full scope and effect of the recent legislation enacted pursuant to the CRA and signed by the President in June 2025. Rather, the EPA is approving adjustment factors for EMFAC2021 in an effort to, as stated in your letter, take a "first step toward reestablishing a pathway for California to continue to meet federal air quality planning and conformity requirements." The EPA looks forward to further engagement with CARB and other relevant stakeholders and reserves all rights and authorities to implement the CAA consistent with the Agency's legal obligations and the recent legislation.

Additional information on implementation

Under the transportation conformity regulation, there are several types of transportation activities that can proceed with interagency consultation (per 40 CFR 93.112) and without additional emissions modeling. As long as such activities do not involve the use of EMFAC, they would not be affected by the EPA's approval of the use of EMFAC2021 with the adjustment factors. First, metropolitan planning organizations and other transportation agencies, as applicable, can continue working from existing, currently conforming transportation plans and TIPs[6] and proceeding with project-level conformity determinations involving non-exempt projects that do ***not*** require a carbon monoxide or particulate

[4] 87 FR 68483 (November 15, 2022) (EPA approval and notice of availability for EMFAC2021). The EPA must approve new versions of California's emissions model, EMFAC, before they are used in a transportation conformity analysis, and in the preparation or revision of SIPs. *See* 40 CFR 93.111(a).

[5] For the same reason, a SIP or conformity determination based on EMFAC2017 must not include the adjustment factors that the EPA approved for use with EMFAC2017 in 2022 (87 FR 68483, November 15, 2022). Please consult with the relevant EPA contacts on any analyses that were begun with EMFAC2017 before the end of the EMFAC2021 new model grace period.

[6] 40 CFR 93.114.

matter hot-spot analysis.[7] Second, projects described in 40 CFR 93.126, 93.127, and 93.128 can also be added to a transportation plan and TIP without a conformity determination, as described in the transportation conformity regulation.

Other than in the cases identified above, transportation conformity determinations must be based on EMFAC2021 with the adjustment factors in order to be consistent with the transportation conformity rule. This is the case even if modeling was started before the waivers for the regulations were disapproved. Unlike planning assumptions, which may change after a conformity analysis begins (40 CFR 93.110(a)), emissions reductions from regulations may only be included in the emissions analysis for conformity determinations under certain circumstances, per 40 CFR 93.122(a)(3). As described above, the regulations listed in CARB's October 31, 2025 letter no longer fit within these circumstances.

In addition, a transportation plan or TIP conformity determination can rely on the previous emissions analysis per 40 CFR 93.122(g) if that previous emissions analysis was based on EMFAC2021 with the adjustment factors. A conformity determination based on a previous emissions analysis that did not include adjustment factors would not meet transportation conformity requirements as described above.

For a project-level conformity determination that includes a hot-spot analysis, EMFAC2021 with the adjustment factors would meet requirements in 40 CFR 93.111(a) related to the use of the latest emissions model and ensure that the modeling does not include the effects of the regulations listed in CARB's October 31, 2025 letter. In addition, conformity determinations for projects with a hot-spot analysis based on EMFAC2021 without the adjustment factors would not meet 40 CFR 93.123(c)(1) because the estimate of emissions would include the effects of regulations that cannot be implemented and would not accurately reflect "the total emissions burden which may result from the implementation of the project." As a result, the hot-spot analysis would not also meet the requirement that the "the total concentration must be estimated" (40 CFR 93.123(c)(1)).

For further information

If you have any questions, please contact me at (415) 231-4710 and lee.anita@epa.gov, or Karina O'Connor at (415) 972-3498 and oconnor.karina@epa.gov.

Sincerely,

Anita Lee
Acting Director, Air and Radiation Division

[7] 40 CFR 93.116 and 93.123.

cc: David Quiros, California Air Resources Board
Nesamani Kalandiyur, California Air Resources Board
Sara Forestieri, California Air Resources Board
Carey Knecht, California Air Resources Board
Ariel Fideldy, California Air Resources Board
Elissa Konove, Federal Highway Administration
Antonio Johnson, Federal Highway Administration
Ray Tellis, Federal Transit Administration

Appendix H. Response to Public Comments

Letter 1 Bill Mayben

December 22, 2025

Comment

Dear Plan Bay Area Staff;

Thank you for forwarding this current Air Quality Conformity Report.

While this analysis shows our Bay Air Quality is, here, livable for populations within our defined boundaries; we would be foolish to believe that the pollution we create simply fails to meet dangerous levels.

The Bay Area is fortunate to have predictable cycles of onshore winds which provide nearly constant flushing and dilution of our atmospheric pollutants.

One could say a sampling of our air is like taking close-up snapshots of a moving train.

On balance, while our air pollutants are not physically here in their annual aggregate; they inevitably combine with other sources of worldwide pollution and remain in our atmosphere for extended periods of time.

A more conscious; accurate measurement would be, instead of sampling pollutants in a brief slice of time, is identifying what are our total annual contributions to enduring world atmospheric pollution from all our sources; and what responsibilities does this portray?

An overarching question, in an era of climate change, is “are we doing our part to reduce cumulative world atmospheric pollution to a level contributing to the significant reduction in global warming?”

It is fact that U.S. air pollution contributes 1/3 of total world atmospheric pollution of greenhouse gasses; so results of local measures at a point in time will not save us in the existential sense.

The real challenge is to clearly identify our actual total annual carbon footprint; not just the part of it that does not blow away; and identify what concrete steps are necessary to reduce it; not by the dilution of our GHG emissions by ambient ocean breezes; but by concerted, measurable, ongoing GHG emission reductions

Since California is a laboratory for conscious living; and the birthplace for what are now functional international smog control measures; what can we now do to address the atmospheric facts with salient solutions, and model these for the world?

We were told initially that vehicle smog control was not feasible. We were told that smokestack emissions could not be reduced. Not economically viable.

Can I claim, standing on our beaches and sampling the wind, that the world is pollution free? No, I cannot.

The lives of our children, and all world children that follow, literally depend on far more than local sampling. There are no fences in the skies.

There are many arguments for continuing as we are; but we are ultimately not living sustainably; not making sustainable contributions for those who follow us.

My calculations indicate we have 4 years maximum in planning, and 20 years maximum in execution, to transition to threshold sustainable practices before the advent of Severe Climate Events prevent us from physically undertaking significant mitigation and adaptation.

Our obligations are transformational, not comfortable.

Yours,
Bill Mayben

Response

Thank you for your comments. Your interest is appreciated, and your comments are part of the official record.

The regional transportation conformity analysis is conducted in accordance with the federal Clean Air Act and U.S. Department of Transportation conformity regulations and is limited to demonstrating conformity with the applicable National Ambient Air Quality Standards (NAAQS) through consistency with the State Implementation Plan. Issues related to greenhouse gas emissions, global atmospheric conditions, cumulative worldwide pollution, or broader climate policy considerations are outside the scope of the NAAQS-based transportation conformity determination. The analysis and findings documented in this report meet all applicable federal transportation conformity requirements, and no changes to the emissions analysis or conformity findings are required.

The MTC Commission will consider these comments as part of its consideration of the final transportation conformity analysis.

Letter 2 Caltrans Air Quality Conformity Branch

January 7, 2026

Comment

Hello All,

I apologize for the delayed response. The Caltrans Air Quality Conformity Branch has completed its quality assurance review of the Plan Bay Area 2050+ Draft Transportation-Air Quality Conformity Report.

40 CFR	Comment
§93.104 (b,c)	Date of prior conformity findings and MPO Resolution is not included and/or found in referenced chapter/section/page cited in the checklist; Conformity Findings section starts on pg. 24
§93.102 (b)(2)(iv) and §93.104 (b, c)	Conformity Demonstration section is from pg. 17-19. Confirm page number and sections for these items.
93.118 (c)	Please include pg. 21 and 22, since it has relevant information for this section.
93.118 (d)	Please include pg. 17, since it has relevant information for this section.
93.119 (a,b,c,d)	Please include all pages that are relevant to this section.
§93.122 (a)(1)	VMT for non-regionally significant Federal projects is accounted for in the regional emissions analysis is not documented in this section. VMT is mentioned on pg. 16 of the document.
§93.122 (a)(2, 3)	Does discuss implementation status of these programs and but not the associated emissions credit for each analysis year in the referenced pages.
§93.122 (a)(4,5,6, 7)	Wrong page number needs to be pp. 53 not pp. 38; document whether or not credits were used.
§93.122 (b)(1)(i) 2	No date to confirm that conformity determination has been made to confirm the network based travel model is no more than 10 years from conformity determination date
§93.122 (b)(1)(i) 2	Need to clearly document the comparison to historical trends and explain the significant differences between past trends and forecasts
§93.122 (b)(1)(v)	Documenting the use of zone-to-zone travel impedances is not included in Modeling & Assumptions pp. 12-13 as cited; unable to locate in document.

40 CFR	Comment
§93.122 (b)(1)(vi)	Documenting how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices is not included in Modeling & Assumptions pp. 12 as cited; unable to locate in document.

We also recommend including a Summary of Latest Planning Assumptions for the Conformity Analysis (see attached example and Table 2-1 in MCAG's 2022 RTP 2023 Corresponding Air Quality Analysis). This table has proved to better organize and find the required materials.

Please let us know if you have any questions about our review. Thanks!

Warm Regards,

Stephen Conteh
District Branch Chief
Regional Planning and Native American Liaison

Response

Thank you for your comments. Your suggestions have been incorporated into the final draft and are part of the official record.

Revisions were made throughout the *Draft Transportation-Air Quality Conformity Report* to improve clarity, accuracy of references, and documentation. As per CFR §93.104 (b,c), the date of the most recent prior conformity finding was added to page 2 of the Introduction, and the MPO resolution will be incorporated into the final report following adoption of Plan Bay Area 2050+. Page references for the Conformity Findings and Conformity Demonstration sections were corrected and expanded to include all relevant pages and sections, in accordance with CFR §93.102 (b)(2)(iv) and §93.104 (b, c).

Additional documentation was added to page 9 to confirm that all regionally significant projects, as well as other non-exempt significant projects in Plan Bay Area 2050+ and the Amended 2025 TIP, are included in the regional emissions analysis, with updated references noting where VMT and project inclusion are discussed as per CFR §93.122 (a)(1). Revisions were made to confirm documentation of emissions credits on page 21 as per CFR §93.122 (a)(2, 3).

Revisions were added to page 12 of the Modeling and Assumptions section to confirm that the network-based travel model is no more than 10 years old relative to the conformity determination date as per CFR §93.122 (b)(1)(i) 2, and language was added to compare forecasted travel activity to historical trends, with explanations of notable differences. The Modeling and Assumptions section was revised to document the use of zone-to-zone travel impedances and the sensitivity of the travel model to changes in time, cost, and other factors affecting travel behavior, as per CFR §93.122 (b)(1)(v) and §93.122 (b)(1)(vi). Finally, a Summary of Latest Planning Assumptions table was added on to Appendix B (page B-1) to improve organization and make key conformity analysis information easier to locate.

The MTC Commission will consider these comments as part of its consideration of the final transportation conformity analysis.

Letter 3 Peter Hensel

January 14, 2026

Comment

If you truly want better air quality & less traffic congestion I advise you to scale back your new housing mandates foisted upon local jurisdictions. Every new resident has a carbon footprint. Under current management & with no oversight from state government or legislature, ABAG-MTC is actually a big contributor to global warming. Your unsustainable new housing mandates are contributing to unregulated population growth and enhanced carbon emissions.

Sincerely,
Peter Hensel,
Corte Madera, CA

Response

Thank you for your comments. Your interest is appreciated, and your comments are part of the official record.

The regional transportation conformity analysis is conducted in accordance with the federal Clean Air Act and U.S. Department of Transportation conformity regulations and is limited to demonstrating conformity with the applicable National Ambient Air Quality Standards (NAAQS) through consistency with the State Implementation Plan. As documented in the report, the emissions analysis reflects the mobile-source emissions impacts of implementing the adopted long-range regional transportation plan and its strategies, which accommodate forecasted growth in population, housing, and employment through 2050. The Regional Growth Forecast of population, households, and jobs is a foundational input to the plan and its technical analyses and is designed to meet applicable federal and state planning requirements, including state requirements to plan for housing sufficient to accommodate the region's projected population across all economic segments. Additional detail on the Regional Growth Forecast and its development is provided in the *Plan Bay Area 2050+ Forecasting and Modeling Report*.

The MTC Commission will consider these comments as part of its consideration of the final transportation conformity analysis.

Letter 4 Jon Hamilton

January 14, 2026

Comment

Comments from a resident of Bay Farm Island in Alameda adjacent to Oakland airport.

Transportation planning needs to include also air transit.

I have lived here on Bay Farm Island for 33 years.

FedEx has it's largest transit hub here in Oakland airport with the exception of its primary distribution center in the middle of the country.

Since 2000 the cargo amount in tonnage has increased 10 fold.

Since 2000 the passengers taking planes in and out of Oakland has tripled.

The most popular destination of planes leaving OAK is Las Vegas.

Having taken high speed trains in Japan, China, and Europe there is an alternative to air transit.

My issue is quite simple - cargo could be moved by truck, train, or air. Likewise, people can be moved by Car, Bus, train, or air. The US government heavily subsidizes the airports and the aircraft industry. Your omission of pollutants related to air transit is serious. Here on Bay Farm Island for example we listen to approximately 20 cargo planes departing the airport from 2:30 AM to 8:00 AM 6 days a week.

Where are the pollutants from this source included in your analysis/forecast?

Please include the factors associated with air transit in your analysis.

Thank you,
Jon Hamilton, P.E. (retired)
President CLASS
CLASS is a airport noise and safety group formed 30 years ago by the 3000 homes in the community of Harbor Bay Isle on Bay Farm Island.

Response

Thank you for your comments. Your interest is appreciated, and your comments are part of the official record.

The regional transportation conformity analysis is conducted in accordance with the federal Clean Air Act and U.S. Department of Transportation conformity regulations and is limited to evaluating emissions from on-road motor vehicles associated with the long-range regional plan and Transportation Improvement Program, as they relate to conformity with the applicable National Ambient Air Quality Standards (NAAQS) through consistency with the State Implementation Plan. Emissions from aviation activity, including passenger and cargo aircraft operations, are regulated and analyzed through separate federal and state air quality programs and are not included within the scope of a regional transportation conformity determination.

The MTC Commission will consider these comments as part of its consideration of the final transportation conformity analysis.

Letter 5 Brian Swanson

January 19, 2026

Comment

Dear Plan Bay Area 2050+ Draft Transportation-Air Quality Conformity Team:

I am a resident, voter, and taxpayer of the City of San Ramon and Contra Costa County, and a certified planner specializing in transportation impact analysis. I submit this comment on the Plan Bay Area 2050+ Draft Transportation–Air Quality Conformity (AQC) Report ("Draft Conformity Analysis" or "Draft AQC Report").

My comment is not limited to whether the Draft AQC Report reaches a "pass/fail" conformity conclusion under the federal Clean Air Act (CAA). Instead, I focus on the structural forecast-risk and disclosure-risk that this conformity package transfers downstream to local jurisdictions and project sponsors—because Plan Bay Area 2050+ is the Bay Area's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), and because local agencies routinely tier subsequent planning, capital programming, and California Environmental Quality Act (CEQA) analyses from these regional assumptions and conclusions.

I acknowledge the Draft AQC Report's stated conclusion that Plan Bay Area 2050+ and the 2025 Transportation Improvement Program (TIP) conform to applicable federal requirements. [Draft AQC Report, Executive Summary, p. 1 (PDF p. 9)] However, the same Draft AQC Report also contains material "uncertainty amplifiers" that strengthen—not weaken—the case for High/Medium/Low growth forecast envelopes and sensitivity disclosure to protect local jurisdictions from inheriting avoidable legal, fiscal, operational, and environmental risk.

1. The Draft AQC Report confirms it relies on one primary growth forecast and one primary modeled pathway—despite major forecast volatility and post-COVID uncertainty

1.1 One set of "planning assumptions" is used to generate travel activity and emissions, and that dependence should be explicitly stress-tested

The Draft AQC Report states the conformity analysis uses "the latest planning assumptions and EPA-approved models" and that travel activity forecasts were generated using MTC's Travel Model 1.6, with emissions estimated using EMFAC2021 adjusted by EPA-approved CARB adjustment factors. [Draft AQC Report, Executive Summary, p. 1 (PDF p. 9)]

This is exactly why High/Medium/Low envelopes are necessary for prudent, defensible decision-making: a single "primary" forecast may satisfy the minimum structure of a conformity demonstration, but it does not disclose the range of reasonably foreseeable outcomes that local jurisdictions must plan and permit against (including VMT-related determinations under SB 743).

1.2 The Draft AQC Report's own growth table shows a "jobs-led" structure that can inflate downstream travel activity and VMT assumptions

The Draft AQC Report includes a Regional Growth Forecast table showing:

Population: 7,749,000 (2020) → 9,586,000 (2050);

Employment: 4,025,000 (2020) → 5,436,000 (2050); and

Households: 2,798,000 (2020) → 3,796,000 (2050).

[Draft AQC Report, Table 1 (Plan Bay Area 2050+ Regional Growth Forecast), p. 11 (PDF p. 19)]

Those totals imply growth on the order of approximately +24% population, +35% employment, and +36% households over 2020–2050 (based on the table values). When employment increases materially faster than population in the control totals, the risk is that employment becomes an upstream anchor that can inflate VMT and infrastructure sizing unless the modeling chain explicitly and transparently corrects for: (a) persistent telework/hybrid work, (b) multiple jobholding/gig work effects, and (c) post-COVID travel behavior changes. This is not "extra" analysis—this is an appropriate disclosure expectation for a region-shaping RTP/SCS.

2. The Draft AQC Report documents regulatory disruption and "off-model adjustment factors" that increase uncertainty and strengthen the need for High/Medium/Low scenario sensitivity

2.1 The Draft AQC Report confirms federal CRA action disrupted CARB regulatory assumptions and required adjustments to EMFAC outputs

The Draft AQC Report states that federal action in June 2025 under the Congressional Review Act (CRA) revoked several California Air Resources Board (CARB) waivers and that CARB developed "off-model adjustment factors" to remove emission benefits from multiple regulations, and that EPA approved those off-model adjustment factors on November 24, 2025. [Draft AQC Report, "Off-Model Adjustment Factors," p. 15 (PDF p. 23)]

This is a major disclosure issue: when the conformity analysis itself documents regulatory "shock," it is not reasonable to treat a single forecast path and a single modeled pathway as sufficient disclosure for all downstream users of this RTP/SCS record.

2.2 Even if only one forecast is used for the required conformity test, nothing prevents MTC from publishing "envelope" sensitivity outputs

The Draft AQC Report explains conformity is demonstrated using two test types:

- an emissions budget test for ozone precursors based on the 2001 Ozone Attainment Plan budgets; and
- a baseline year test for fine particulate matter (PM2.5), using 2008 baseline emissions.

[Draft AQC Report, "Conformity Tests and Budgets," p. 17 (PDF p. 25) and "PM2.5 Interim Emissions Test (Baseline Year Test)," p. 18 (PDF p. 26)]

Nothing about that framework logically precludes MTC from also providing additional sensitivity/envelope results (High/Medium/Low growth; higher/lower VMT; higher/lower transit mode share; higher/lower electrification uptake), even if the "official" determination relies on the required planning assumptions. Airports routinely publish high/medium/low forecasting envelopes

in master plans and accompanying environmental documents; MPOs should be explicitly aware of this and should do the same.

3. The Draft AQC Report's results show conformity margins that may be large, and the public needs "robustness" disclosure to understand what is driving the pass result

3.1 Ozone budgets used for conformity are described as stemming from the 2001 Ozone Attainment Plan and remaining applicable

The Draft AQC Report states the conformity analysis uses VOC and NOx budgets from the 2001 Ozone Attainment Plan, notes EPA adequacy and approval dates, and states these budgets remain in effect for conformity (until superseded). [Draft AQC Report, "Ozone Budget Test," p. 17 (PDF p. 25)]

Given that the budgets are from an older plan and are used as the controlling threshold, the Draft AQC Report should explicitly disclose how sensitive the conformity outcome is to key drivers (growth assumptions; VMT; fleet mix/electrification; post-COVID behavior). This is not a request to change the legal conformity test; it is a request for disclosure that protects the nine counties and their local jurisdictions from inheriting an "opaque" pass result that is not robust to foreseeable futures.

3.2 The Draft AQC Report shows modeled travel activity growth and declining modeled auto mode share—both of which should be stress-tested

The Draft AQC Report presents modeled travel activity inputs including Daily Vehicle Miles Traveled (VMT) increasing from 150,959,000 (2023) to 183,801,000 (2050) and shows modeled mode share changes for all trips. [Draft AQC Report, Table 3 and Figure 3, p. 16 (PDF p. 24)]

Given well-documented post-COVID transit ridership uncertainty and work-pattern changes, the Draft AQC Report should provide envelope/sensitivity outputs for:

- higher auto mode share (lower transit uptake than modeled),
- higher VMT than modeled (if transit recovery or land-use assumptions underperform), and
- slower fleet turnover/electrification (especially given the CRA-driven regulatory disruption described in the report).

4. High/Medium/Low growth forecast envelopes are necessary because local jurisdictions bear the CEQA and fiscal exposure from a single-path regional conformity narrative

4.1 CEQA is threshold-based and is applied by local lead agencies; single-path regional forecasting is a disservice to local threshold determinations

Local agencies must evaluate projects against locally adopted thresholds of significance. When the region uses one primary forecast/control total pathway and tiers multiple downstream analyses from it (including VMT-related pathways), it can distort local CEQA determinations—particularly if the single-path forecast becomes an inflated "baseline" that produces phantom improvements relative to an inflated counterfactual.

Even if the AQC pass/fail determination is legally tied to the required conformity test, local governments and project sponsors still need scenario envelope disclosure because they must plan for:

- fiscal feasibility and service delivery,
- localized emissions exposure and circulation,
- VMT mitigation credibility, and
- implementation enforceability.

5. Energy supply and electric vehicle charging are conformity-relevant and must be treated as a core interagency feasibility constraint

The conformity analysis relies materially on vehicle technology and fleet assumptions (including electrification trajectories). The Draft AQC Report explicitly discusses regulatory assumptions and emissions modeling inputs (including the CARB/EPA adjustment factors). [Draft AQC Report, Executive Summary, p. 1 (PDF p. 9) and "Off-Model Adjustment Factors," p. 15 (PDF p. 23)]

Accordingly, Pacific Gas and Electric Company (PG&E) and other load-serving entities (including Community Choice Aggregators and transmission system operators, as applicable) must be engaged in Plan Bay Area 2050+ assumptions and implementation pathways at a level commensurate with EV growth and EV charger deployment needs. If electrification/charging build-out is a material assumed driver of long-term emissions outcomes, then grid feasibility, upgrade constraints, cost allocation, and affordability impacts must be treated as a core risk and disclosed with High/Medium/Low envelopes.

6. Administrative record transparency standard for meaningful participation

For meaningful public participation and a verifiable record, all public materials related to the Draft Conformity Analysis—including the Draft AQC Report, appendices, technical files, interagency consultation materials to the extent publicly releasable, and all submitted public comments and agency responses—should be posted together and directly adjacent to the relevant meeting agenda item(s) on the main meeting webpage, reachable in one or two clicks (not separated into multi-click landing pages), with maintained link integrity and accessibility.

Requested Actions

Before finalizing the conformity determination and adopting Plan Bay Area 2050+ as an RTP/SCS, I respectfully request that MTC/ABAG:

1. Publish High/Medium/Low forecast envelopes (and at least one or more sensitivity cases for VMT and mode share) and disclose how conformity-relevant outputs change across those envelopes (even if only one scenario is used for the official required conformity test).
2. Disclose robustness and margin-of-safety information for ozone and PM2.5 results (i.e., how close/far results are from the applicable budgets/baselines and which assumptions drive the outcome). [Draft AQC Report, Table 6 and Table 7, pp. 20–21 (PDF pp. 28–29)]
3. Provide a clear, written explanation of how the CRA-driven regulatory disruption and off-model adjustment approach affects uncertainty and why additional envelope disclosure is (or is not) provided. [Draft AQC Report, "Off-Model Adjustment Factors," p. 15 (PDF p. 23)]

4. Integrate energy/EV charging feasibility into the conformity-related disclosure framework by documenting active engagement with PG&E and other relevant entities and identifying key constraints, upgrade pathways, and affordability risks tied to electrification assumptions.
5. Implement and maintain the administrative record posting standard described above.

Respectfully submitted,
Brian Swanson, AICP
San Ramon, Contra Costa County, California

Response

Thank you for your detailed comments. Your interest is appreciated, and your comments are part of the official record.

The regional transportation conformity analysis is conducted in accordance with the federal Clean Air Act and U.S. Department of Transportation conformity regulations and is focused on demonstrating that the adopted long-range regional plan and Transportation Improvement Program conform to the applicable National Ambient Air Quality Standards (NAAQS) through consistency with the State Implementation Plan. Consistent with federal requirements, the conformity determination is based on the latest adopted planning assumptions and EPA-approved emissions models and does not require evaluation of alternative growth scenarios or sensitivity testing beyond the required conformity tests.

As documented in the report, the conformity analysis evaluates regional on-road mobile-source emissions for multiple analysis years (2030, 2040, and 2050), each of which reflects different forecasted levels of population and employment growth and corresponding changes in travel activity, vehicle miles traveled (VMT), mode share, and emissions outcomes. This multi-year analysis provides information on how emissions change over time as the region grows and as adopted transportation and land use strategies are implemented.

The conformity analysis does not test alternative assumptions regarding future travel behavior or mode choice beyond those represented in the adopted travel model. Travel Model 1.6 reflects observed travel behavior, past trends, and survey data, and forecasts those relationships into the future based on the adopted planning assumptions. Additional detail on the structure and behavior of the travel model used in the conformity analysis is provided in Subsection Travel Model 1.6: Travel Model, including documentation of the model's utility expressions and choice model definitions (see footnote 5). MTC staff also conducted travel model sensitivity testing as part of the development of the Sustainable Communities Strategies for Plan Bay Area 2050 and Plan Bay Area 2050+, where alternative assumptions and strategies were evaluated. The regional transportation conformity analysis applies the adopted planning assumptions and model configuration resulting from that process, consistent with federal conformity requirements.

Based on the required analyses and procedures, the regional transportation conformity analysis and findings documented in this report meet all applicable federal transportation conformity requirements, and no changes to the emissions analysis or conformity findings are warranted as a result of this comment.

The MTC Commission will consider these comments as part of its consideration of the final transportation conformity analysis.

Appendix I. MPO Air Quality Conformity Checklist

Table 14. MPO Air Quality Conformity Checklist

40 CFR	Criteria	Ch, Section, Page	Comments
§93.102	Document the applicable pollutants and precursors for which EPA designates the area as nonattainment or maintenance. Describe the nonattainment or maintenance area and its boundaries.	Regulatory Framework, pp. 5-6	
§93.102 (b)(2)(iii)	PM10 areas: document whether EPA or state has found VOC and/or NOx to be a significant contributor or if the SIP establishes a budget	N/A	
§93.102 (b)(2)(iv)	PM2.5 areas: document if both EPA and the state have found that NOx is not a significant contributor to the PM 2.5 nonattainment problem or that the SIP does not establish a budget (otherwise, conformity applies for NOx)	Conformity Demonstration, pp. 18-20	
§93.102 (b)(2)(v)	PM2.5 areas: document if both EPA and the state have found VOC, SO2, and/or NH3 to be a significant contributor or if the SIP establishes a budget	N/A	
§93.104 (b, c)	Document the date that the MPO officially adopted, accepted or approved the TIP/RTP and made a conformity determination. Include a copy of the MPO resolution. Include the date of the last prior conformity finding.	Conformity Demonstration, pp. 18-20	
§93.104 (e)	If the conformity determination is being made to meet the timelines included in this section, document when the new motor vehicle emissions budget was approved or found adequate.	N/A – no new motor vehicle emission budget included in this analysis	

40 CFR	Criteria	Ch, Section, Page	Comments
§93.106	If the metropolitan planning area is in a serious, severe, or extreme ozone nonattainment area and/or serious carbon monoxide nonattainment area and contains an urbanized population over 200,000, then RTP must specifically describe the transportation system envisioned for future years called "horizon years." Document that horizon years are no more than 10 years apart ((a)(1)(i)). Document that the first horizon year is no more than 10 years from the base year used to validate the transportation demand planning model ((a)(1)(ii)). Document that the attainment year is a horizon year, if in the timeframe of the plan ((a)(1)(iii)). Document that the last year of the transportation plan's forecast period is a horizon year ((a)(1)(iv)).	N/A	Marginal for ozone nonattainment & region was re- designated to attainment for carbon monoxide in 2018
§93.106 (a)(2)(ii)	Describe the regionally significant additions or modifications to the existing transportation network that are expected to be open to traffic in each analysis year. Document that the design concept and scope of projects allows adequate model representation to determine intersections with regionally significant facilities, route options, travel times, transit ridership and land use.	Appendix C: Regionally Significant Projects, p. C-1, and Table 2. Modeled Network Capacity, p. 14	
§93.108	Document the TIP/RTP is fiscally constrained consistent with DOT's metropolitan planning regulations at (23 CFR 450) in order to be found in conformity.	Plan Bay Area 2050+, p. 8 and Transportation improvement Program, p. 8, and Appendix D: Projects in the 2025 TIP, p. D-1	See Appendix D for more information on the 2025 TIP
§93.109 (a, b)	Document that the TIP/RTP complies with any applicable conformity requirements of air quality implementation plans (SIPs) and court orders.	Regional Plans, Programs, and TCMs; pp. 8-10	
§93.109 (c-k)	Provide either a table or text description that details, for each pollutant and precursor, whether the interim emissions tests and/or the budget test apply for conformity. Indicate which emissions budgets have been found adequate by EPA, and which budgets	Conformity Demonstration; pp. 18-20	

40 CFR	Criteria	Ch, Section, Page	Comments
	are currently applicable for what analysis years.		
93.109 (e)	Document if the area has a limited maintenance plan and from where that information is found.	N/A	
93.109 (f)	Document if motor vehicle emissions are an insignificant contributor and in what SIP that determination is found.	N/A	
§93.110 (a, b)	Document the use of latest planning assumptions (source and year) at the "time the conformity analysis begins," including current and future population, employment, travel and congestion. Document the use of the most recent available vehicle registration data. Document the date upon which the conformity analysis was begun.	Modeling & Assumptions, pp. 11-14; Appendix B: Plan Bay Area 2050+ Forecasting and Modeling Report, pp. B-1-B-2	
USDOT/EPA guidance	Document that planning assumptions are less than 5 years old at the time the conformity analysis begins. If assumptions are older than 5 years include justification for not reviewing and updating assumptions at least every 5 years.	Modeling & Assumptions, pp. 11-13	
§93.110 (c,d,e,f)	Document any changes in transit operating policies and assumed ridership levels since the previous conformity determination (c). Document the use of the latest transit fares and road and bridge tolls (d). Document the use of the latest information on the effectiveness of TCMs and other SIP measures that have been implemented (e). Document the key assumptions and show that they were agreed to through Interagency and public consultation (f).	c) & d) Modeling and Assumptions, pp. 11-12; e) Regional Plans, Programs, and TCMs, pp. 9-10; f) Interagency Consultation and Public Involvement, p. 23	TCMs A-E from our applicable SIP (2001 Ozone Attainment Plan) have all been fully implemented and there have been no updates
§93.111	Document the use of the latest emissions model approved by EPA. If the previous model was used and the grace period has ended, document that the analysis began before the end of the grace period.	Emissions Modeling, p. 14	

40 CFR	Criteria	Ch, Section, Page	Comments
§93.112	Document fulfillment of the interagency and public consultation requirements outlined in a specific implementation plan according to §51.390 or, if a SIP revision has not been completed, according to §93.105 and 23 CFR 450. Include documentation of consultation on conformity tests and methodologies as well as responses to written comments.	Interagency Consultation & Public Involvement, p. 23	
§93.113	Document timely implementation of all TCMs in approved SIPs. Document that implementation is consistent with schedules in the applicable SIP and document whether anything interferes with timely implementation. Document any delayed TCMs in the applicable SIP and describe the measures being taken to overcome obstacles to implementation.	Regional Plans, Programs, and TCMs, pp. 8-10	
§93.114	Document that the conformity analyses performed for the TIP is consistent with the analysis performed for the Plan, in accordance with 23 CFR 450.324(f)(2).	Regional Plans, Programs, and TCMs, pp. 8-10	
§93.115	Describe how the projects come from a conforming RTP and TIP. If this criterion is not satisfied, the project must satisfy all criteria in Table 1 of §93.109(b) for a project not from a RTP and TIP.	Regional Plans, Programs, and TCMs, pp. 8-10; Appendix D: Projects in the 2025 TIP, p. D-1	TIP ID number cross-listed with corresponding RTP ID number
§93.118 (a, c, e)	For areas with SIP budgets: Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the Statewide TIP and regionally significant non-Federal projects, are consistent with any adequate or approved motor vehicle emissions budget for all pollutants and precursors in applicable SIPs.	Regional Emissions Analysis, p. 21-24	See Table 6. Ozone Precursor Emissions Compared to Emission Budgets – Summertime Conditions (tons/day)
§93.118 (b)	Document for which years consistency with motor vehicle emissions budgets must be shown.	Conformity Demonstration, pp. 18-20	
93.118 (c)	Document and demonstrate consistency with motor vehicle emissions budgets for each pollutant or pollutant precursor for which the area is in nonattainment or maintenance and for which the applicable	Regional Emissions Analysis, pp. 21-24	

40 CFR	Criteria	Ch, Section, Page	Comments
	SIP plan establishes a motor vehicle emissions budget.		
§93.118 (d)	Document the use of the appropriate analysis years in the regional emissions analysis for areas with SIP budgets, and the analysis results for these years. Document any interpolation performed to meet tests for years in which specific analysis is not required.	Conformity Demonstration, pp. 18-20	
§93.119 (a, b, c, d)[1]	For areas without applicable SIP budgets: Document that emissions from the transportation network for each applicable pollutant and precursor, including projects in any associated donut area that are in the TIP and regionally significant non-Federal projects, are consistent with the requirements of the "Action/Baseline" or "Action/Baseline Year" emissions tests as applicable.	Regional Emissions Analysis, pp. 21-24	
93.119 (e)	Document the appropriate baseline year.	Conformity Demonstration, p. 19	
93.119 (f)	Document the use of appropriate pollutants and if EPA or the state has made a finding that a particular precursor or component of PM10 is significant or insignificant.	N/A	
§93.119 (g)	For areas without applicable SIP budgets: Document the use of the appropriate analysis years in the regional emissions analysis for areas without applicable SIP budgets. The regional emissions analysis must be performed for analysis years that are no more than ten years apart. The first analysis year must be no more than five years beyond the year in which the conformity determination is being made. The last year of the timeframe of the conformity determination (as described under §93.106(d)) must also be an analysis year.	Regional Emissions Analysis, p. 21	

40 CFR	Criteria	Ch, Section, Page	Comments
§93.119 (h,i)	For areas without applicable SIP budgets: Document how the baseline and action scenarios are defined for each analysis year.	Conformity Demonstration, p. 18-20	
§93.122 (a)(1)	Document that all regionally significant federal and non-Federal projects in the nonattainment/maintenance area are explicitly modeled in the regional emissions analysis. For each project, identify by which analysis it will be open to traffic. Document that VMT for non-regionally significant Federal projects is accounted for in the regional emissions analysis	Regional Plans, Programs, and TCMs, p. 9; Modeling & Assumptions, pp. 11-14	See Appendix C for additional information on regionally significant projects
§93.122 (a)(2, 3)	Document that only emission reduction credits from TCMs on schedule have been included or that partial credit has been taken for partially implemented TCMs. Document that the regional emissions analysis only includes emissions credit for projects, programs, or activities that require regulatory action if: the regulatory action has been adopted; the project, program, activity or a written commitment is included in the SIP; EPA has approved an opt-in to the program, EPA has promulgated the program, or the Clean Air Act requires the program (indicate applicable date). Discuss the implementation status of these programs and the associated emissions credit for each analysis year.	Regional Plans, Programs, and TCMs, pp. 9-10	See Appendix E for additional information on TCMs.
§93.122 (a)(4,5,6, 7)	For nonregulatory measures that are not included in the TIP, include written commitments from appropriate agencies. Document that assumptions for measures outside the transportation system (e.g. fuels measures) are the same for baseline and action scenarios. Document that factors such as ambient temperature are consistent with those used in the SIP unless modified through interagency consultation.	Appendix D: Projects in the 2025 TIP, p. D-1	Default EMFAC2021 Bay Area ambient temperatures & environmental conditions consistent with those used in the Bay Area SIP

40 CFR	Criteria	Ch, Section, Page	Comments
	Document the method(s) used to estimate VMT on off-network roadways within the urban transportation planning area, and on roadways outside the urban transportation planning area.		
§93.122 (b)(1)(i) [2]	Document that a network-based travel model is in use that is validated against observed counts for a base year no more than 10 years before the date of the conformity determination. Document that the model results have been analyzed for reasonableness and compared to historical trends and explain any significant differences between past trends and forecasts (for per capita vehicle-trips, VMT, trip lengths mode shares, time of day, etc.).	Modeling & Assumptions, p. 12	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (b)(1)(ii) [2]	Document the land use, population, employment, and other network-based travel model assumptions.	Modeling & Assumptions, p. 11	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (b)(1)(iii) [2]	Document how land use development scenarios are consistent with future transportation system alternatives, and the reasonable distribution of employment and residences for each alternative.	Modeling & Assumptions, p. 12	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (b)(1)(iv) [2]	Document use of capacity sensitive assignment methodology and emissions estimates based on a methodology that differentiates between peak and off-peak volumes and speeds, and bases speeds on final assigned volumes.	Modeling & Assumptions, pp. 12-13; Emissions Modeling, pp. 14-15	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report

40 CFR	Criteria	Ch, Section, Page	Comments
§93.122 (b)(1)(v) [2]	Document the use of zone-to-zone travel impedances to distribute trips in reasonable agreement with the travel times estimated from final assigned traffic volumes. Where transit is a significant factor, document that zone-to-zone travel impedances used to distribute trips are used to model mode split.	Modeling & Assumptions, pp. 12-13	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (b)(1)(vi) [2]	Document how travel models are reasonably sensitive to changes in time, cost, and other factors affecting travel choices.	Modeling & Assumptions, p. 12	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (b)(2) [2]	Document that reasonable methods were used to estimate traffic speeds and delays in a manner sensitive to the estimated volume of travel on each roadway segment represented in the travel model.	Modeling & Assumptions, p. 12	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (b)(3) [2]	Document the use of HPMS, or a locally developed count-based program or procedures that have been chosen through the consultation process, to reconcile and calibrate the network-based travel model estimates of VMT.	Modeling & Assumptions, p. 13	See Draft Plan Bay Area 2050+ Modeling and Forecasting Report
§93.122 (d)	In areas not subject to §93.122(b), document the continued use of modeling techniques or the use of appropriate alternative techniques to estimate vehicle miles traveled.	N/A	
§93.122 (e, f)	Document, in areas where a SIP identifies construction-related PM10 or PM 2.5 as significant pollutants, the inclusion of PM10 and/or PM 2.5 construction emissions in the conformity analysis.	N/A	

40 CFR	Criteria	Ch, Section, Page	Comments
§93.122 (g)	If appropriate, document that the conformity determination relies on a previous regional emissions analysis and is consistent with that analysis. The new plan and TIP contain all the projects that must be started to achieve the highway and transit system envisioned by the plan ((g)(1)(i)) All plan and TIP projects are included in the transportation plan with design concept and scope adequate to determine their contribution to emissions in the previous determination; (g)(1)(ii)) The design concept and scope of each regionally significant project in the new plan/TIP are not significantly different from that described in the previous (g)(1)(iii))	N/A	
§93.124	Document if there are subarea budgets established, and for which areas (93.124(c)). Document if there is a safety margin established, and what are the budgets with the safety margin included (93.124(a)). Document if there has been any trading among budgets, and if so, which SIP establishes the trading mechanism, and how it is used in the conformity analysis (93.124(b)). If there is more than one MPO in the area, document whether separate budgets are established for each MPO (93.124(d)). The previous regional emissions analysis meets 93.118 or 93.119 as applicable ((g)(1)(iv))	N/A	"Baseline year" test used for PM2.5 conformity and no comparison to previous regional analysis included
§93.126, §93.127, §93.128	Document all projects in the TIP/RTP that are exempt from conformity requirements or exempt from the regional emissions analysis. Indicate the reason for the exemption (Table 2, Table 3, traffic signal synchronization) and that the interagency consultation process found these projects to have no potentially adverse emissions impacts.	Appendix D: Projects in the 2025 TIP, p. D-1	

[1] Note that some areas are required to complete both interim emissions tests.

[2] 40 CFR 93.122(b) refers only to serious, severe and extreme ozone areas and serious CO areas above 200,000 population.

Disclaimers: This checklist is intended solely as an informational guideline to be used in reviewing Transportation Plans and Transportation Improvement Programs for adequacy of their conformity documentation. It is in no way intended to replace or supersede the Transportation Conformity regulations of 40 CFR Parts 51 and 93, the Statewide and Metropolitan Planning Regulations of 23 CFR Part 450 or any other EPA, FHWA or FTA guidance pertaining to transportation conformity or statewide and metropolitan planning. This checklist is not intended for use in documenting transportation conformity for individual transportation projects in nonattainment or maintenance areas. 40 CFR Parts 51 and 93 contain additional criteria for project-level conformity determinations.

Executive Leadership

Andrew B. Fremier
Executive Director

Alix Bockelman
Chief Deputy Executive Director

Derek Hansel
Chief Financial Officer

Kathleen Kane
General Counsel

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Chief Operating Officer

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Metropolitan Transportation Commission

Legislation Text

File #: 26-0382, **Version:** 1

Subject:
MTC Resolution No. 4749. Certification of Final Plan Bay Area 2050+ Environmental Impact Report, adoption of CEQA Findings, Statements of Overriding Considerations, and Mitigation Monitoring and Reporting Program

Adoption of MTC Resolution No. 4749 certifying the Final Plan Bay Area 2050+ Environmental Impact Report, adopting the CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program.

Presenter:
Dave Vautin

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

March 25, 2026 **Agenda Item 10c - 26-0382**

MTC Resolution No. 4749. Certification of Final Plan Bay Area 2050+ Environmental Impact Report, adoption of CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program

Subject:

Adoption of MTC Resolution No. 4749 certifying the Final Plan Bay Area 2050+ Environmental Impact Report, adopting the CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program.

Background:

At its meeting on March 25, 2026, the Metropolitan Transportation Commission will receive a report and referral from the MTC Planning Committee on adoption of MTC Resolution No. 4749, Certification of Final Plan Bay Area 2050+ Environmental Impact Report, adoption of CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program.

Due to its length, the Final EIR is not attached to this memorandum but is available for public review online at the Plan Bay Area website, https://planbayarea.org/2050/environmental-impact-report-eir, in person by appointment at MTC offices located at 375 Beale Street in San Francisco, or by contacting info@planbayarea.org or calling (415) 778-6757 to arrange alternative access.

Issues:

None identified.

Recommendations:

That the Commission adopt MTC Resolution No. 4749, certifying the Final Plan Bay Area 2050+ Environmental Impact Report, adopting the CEQA Findings, Statement of Overriding Considerations, and Mitigation Monitoring and Reporting Program.

Attachments:

- Joint MTC Planning Committee and ABAG Administrative Committee Summary Sheet dated March 13, 2026
- MTC Resolution No. 4749 and its attachments including:
    - Attachment A: Final Environmental Impact Report (available online at https://planbayarea.org/2050/environmental-impact-report-eir
    - Attachment B: CEQA Findings and Facts in Support of Findings and Statement of Overriding Considerations
    - Attachment C: Mitigation Monitoring and Reporting Program for Plan Bay Area 2050+

Andrew B. Fremier

Metropolitan Transportation Commission and Association of Bay Area Governments

Joint MTC Planning Committee with the ABAG Administrative Committee

March 13, 2026 **Agenda Item 8c**

MTC Resolution No. 4749; and ABAG Resolution No. 01-2026.

Final Plan Bay Area 2050+ Environmental Impact Report

Subject:

Request referral of MTC Resolution No. 4749 and ABAG Resolution No. 01-2026 to the Commission and ABAG Executive Board, respectively.

Background:

MTC and ABAG staff, in coordination with a technical environmental consultant (Ascent Environmental, Inc.) prepared the Final Environmental Impact Report (Final EIR) for Plan Bay Area 2050+ in compliance with the California Environmental Quality Act (CEQA). The EIR evaluates the potential environmental effects of implementing the proposed plan, identifies feasible mitigation measures to reduce significant impacts, and analyzes reasonable alternatives to the proposed plan. Preparation of the Final EIR represents one of the final steps in the CEQA process for Plan Bay Area 2050+, which began in January 2025 with the release of the Notice of Preparation (NOP).

In June 2025, MTC and ABAG took action to advance the Plan Bay Area 2050+ Final Blueprint (MTC Resolution No. 4715 and ABAG Resolution No. 8-2025) into the environmental review process pursuant to CEQA, following a presentation on the Final Blueprint's performance and equity outcomes. After completing analysis of the proposed plan and alternatives, staff released the Draft EIR on October 20, 2025, initiating a 60-day public review and comment period that concluded on December 18, 2025. During the comment period, staff held three virtual public hearings to receive comments on the Draft EIR, in addition to broader engagement conducted for the Draft Plan Bay Area 2050+.

Staff reviewed all comments received on the Draft EIR in December 2025 and January 2026. More than 100 comments were submitted and are addressed in the Final EIR, including refinements to the Draft EIR where appropriate. All comments were posted online in early February and can be found at https://planbayarea.org/digital-library/draft-environmental-impact-report-plan-bay-area-2050-plus-public-comments-0pdf. Consistent with CEQA requirements,

written responses to comments submitted by public agencies will be provided at least 10 days prior to the proposed certification of the Final EIR, scheduled for March 19, 2026 (ABAG Executive Board) and March 25, 2026 (MTC Commission).

Based on staff review, no significant new information was added to the Final EIR that would require recirculation of the Draft EIR under CEQA. Specifically, the comments and responses did not identify any new significant environmental impacts, nor did they substantially increase the severity of impacts already disclosed in the Draft EIR.

Final EIR and Findings:

The Final EIR includes all comments received on the Draft EIR and responses to those comments, including consolidated "master responses" addressing issues raised by multiple commenters. The Final EIR also incorporates revisions to the Draft EIR and includes the Mitigation Monitoring and Reporting Program. For reference, the Draft EIR and its appendices are included in the Final EIR.

Due to its length, the Final EIR is not attached to this memorandum but is available for public review online at the Plan Bay Area website, https://planbayarea.org/2050/draft-environmental-impact-report-eir, in person by appointment at MTC offices located at 375 Beale Street in San Francisco, or by contacting info@planbayarea.org or calling (415) 778-6757 to arrange alternative access.

In conjunction with certification of the Final EIR, staff will bring forward CEQA Findings, including a Statement of Overriding Considerations, for consideration by the Commission and the ABAG Executive Board. These findings summarize the basis for approving the proposed plan and address significant environmental impacts identified in the EIR. The Findings are expected to highlight that:

- The proposed plan reflects substantially greater public and stakeholder input than the EIR alternatives, based on a multi-year planning process.
- Unlike other alternatives considered, the proposed plan advances all five adopted Guiding Principles and meets applicable federal and state requirements.

- The proposed plan identifies more than 60 near-term implementation actions to advance its 35 strategies, making it more actionable in the near term than other alternatives evaluated in the EIR.

Based on the Final EIR and the accompanying CEQA Findings, MTC and ABAG staff recommend certification of the Final EIR and adoption of the CEQA Findings prior to adoption of the proposed plan as the Final Plan Bay Area 2050+.

Next Steps:

Staff will finalize the proposed Findings document in advance of the ABAG Executive Board meeting on March 19, 2026, and the MTC Commission meeting on March 25, 2026.

Issues:

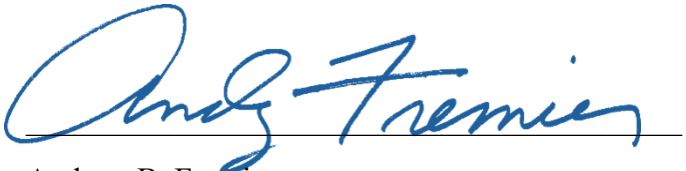
None identified.

Recommendation:

Refer ABAG Resolution No. 01-2026 to the ABAG Executive Board meeting on March 19, 2026, and MTC Resolution No. 4749 to the MTC Commission meeting on March 25, 2026, to certify the Final Plan Bay Area 2050+ Environmental Impact Report and adopt the CEQA Findings.

Attachments:

- MTC Resolution No. 4749
  - Attachment B: The document is also available at https://planbayarea.org/2050/environmental-impact-report-eir
  - Attachment C
- ABAG Resolution No. 01-2026
  - Attachment B: The document is also available at https://planbayarea.org/2050/environmental-impact-report-eir
  - Attachment C



Andrew B. Fremier

Date: March 25, 2026
W.I.: 1121
Referred by: Planning

ABSTRACT

MTC Resolution No. 4749

This resolution adopts findings pursuant to the California Environmental Quality Act (CEQA), including a Statement of Overriding Considerations; adopts a Mitigation Monitoring and Reporting Program (MMRP); and certifies the Final Environmental Impact Report prepared for Plan Bay Area 2050+ (SCH# 2025010348), the long-range regional plan for the San Francisco Bay Area.

Further discussion of this subject is contained in the Planning Committee Summary Sheet dated March 13, 2026.

Date: March 13, 2026
W.I.: 1121
Referred by: Planning

Re: Certification of the Final Environmental Impact Report prepared for Plan Bay Area 2050+ (SCH# 2025010348), adoption of environmental findings pursuant to the California Environmental Quality Act and a Statement of Overriding Considerations, and adoption of a Mitigation Monitoring and Reporting Program.

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4749

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Section 66500 et seq.; and

WHEREAS, the Association of Bay Area Governments (ABAG), a joint exercise of powers entity created pursuant to California Government Code Sections 6500 et seq., is the Council of Governments and the regional land use planning agency for the San Francisco Bay Area; and

WHEREAS, California Government Code § 65080 et seq. requires MTC to prepare and update a long-range Regional Transportation Plan (RTP), including a Sustainable Communities Strategy (SCS) prepared in conjunction with ABAG, every four years; and

WHEREAS, Plan Bay Area 2050+ ("Plan") is envisioned to be the Bay Area's next long-range regional plan, ultimately serving as the Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area; and

WHEREAS, MTC and ABAG served as joint lead agencies in preparing a Programmatic Environmental Impact Report ("Program EIR") (SCH# 2025010348) (attached hereto as Attachment A and incorporated herein as though set forth at length) with the assistance of MTC staff and consultants pursuant to the California Environmental Quality Act (CEQA) (Public

Resources Code § 21000 et seq.) and the State CEQA Guidelines (14 Cal. Code Regs. § 15000 et seq.) for the Plan; and

WHEREAS, the Program EIR provides full disclosure and programmatic analysis of the potentially significant environmental effects of the Plan for purposes of State law requirements; federal law exempts approval of a transportation plan from environmental review (23 U.S.C., § 134 (j)); and

WHEREAS, MTC and ABAG issued a Notice of Preparation (NOP) of a Draft Program EIR on January 14, 2025, and circulated the NOP for a period of at least 30 days pursuant to State CEQA Guidelines §§ 15082(a), 15103 and 15375; and

WHEREAS, pursuant to State CEQA Guidelines §§ 15206 and 15082, MTC and ABAG publicly noticed and held a public scoping meeting on January 29, 2025, for the purpose of soliciting comments from the public and potential responsible and trustee agencies, including details about the scope and content of the environmental information related to the responsible and trustee agencies' areas of statutory responsibility, as well as the significant environmental issues, reasonable alternatives, and mitigation measures that the responsible and trustee agencies would need to have analyzed in the Program EIR; and

WHEREAS, MTC and ABAG received responses to the NOP from state, regional and local agencies, organizations, and individuals, which assisted MTC and ABAG in narrowing the issues and identifying alternatives to be analyzed in the Draft Program EIR; and

WHEREAS, the Draft Program EIR was completed and filed with the State Office of Planning and Research (OPR) on October 16, 2025; and

WHEREAS, MTC and ABAG commenced a 59-day review period to solicit comments on the Draft Program EIR, which ended on December 18, 2025; and

WHEREAS, pursuant to State CEQA Guidelines § 15087, MTC and ABAG also provided a Notice of Availability (NOA) to all organizations and individuals who previously requested such notice and published a NOA for the Draft Program EIR on October 10, 2025, in a

newspaper of general circulation. In addition, copies of the Draft Program EIR were made available at public libraries and at the offices of MTC and ABAG and electronic links to the Draft Program EIR were provided on their websites; and

WHEREAS, during the comment period on the Draft Program EIR, MTC and ABAG consulted with and requested comments from responsible and trustee agencies, other regulatory agencies, and others pursuant to State CEQA Guidelines § 15086; and

WHEREAS, during the public review period for the Draft Program EIR, MTC and ABAG held three public hearings on the Draft Program EIR and three public hearings on the plan; and

WHEREAS, during the public review period for the Draft Program EIR, MTC and ABAG received written comment letters, email correspondence, and oral and written comments from public hearings, which are included in the Final Program EIR; and

WHEREAS, after the public review period for the Draft Program EIR ended, MTC and ABAG received additional written comment letters; and

WHEREAS, MTC and ABAG staff evaluated all comments on environmental issues received during the administrative process including all comments received during the public comment period and, after the close of the public comment period, has continued to review additional comments submitted upon receipt; and

WHEREAS, pursuant to Public Resources Code § 21092.5 and CEQA Guidelines § 15088, MTC and ABAG provided written responses to all public agencies that submitted comments on the Draft Program EIR on March 6, 2026, more than ten days prior to certification of the Program EIR; and

WHEREAS, MTC and ABAG staff prepared the Final Program EIR, consisting of: (1) comments and recommendations received from state, regional and local agencies, organizations, and individuals on the Draft Program EIR; (2) responses by MTC and ABAG to significant environmental points raised in the review and consultation process, including Master Responses;

(3) revisions to the Draft Program EIR; (4) all appendices to the Final Program EIR; and (5) the Draft Program EIR, including all appendices and revisions thereto; and

WHEREAS, no comments made in the public hearings conducted by MTC and ABAG, nor any additional information received, have produced significant new information requiring recirculation or additional environmental review under State CEQA Guidelines § 15088.5; and

WHEREAS, State CEQA Guidelines § 15090 provides that lead agencies shall certify that the decision-making body of the lead agency has reviewed and considered the information presented in the Program EIR, that the Program EIR has been completed in compliance with CEQA, and that the Program EIR reflects the lead agencies' independent judgement and analysis, prior to approving a project; and

WHEREAS, MTC and ABAG have prepared CEQA Findings in compliance with Public Resources Code §§ 21081 and 21081.5, and CEQA Guidelines § 15091, which are entitled "CEQA Findings and Facts in Support of Findings and Statement of Overriding Considerations" (CEQA Findings) (attached hereto as Attachment B and incorporated herein as though set forth at length); and

WHEREAS, all of the findings and conclusions made by MTC and ABAG pursuant to this Resolution are based upon the oral and written evidence presented to it as a whole and not solely on the information provided in this Resolution; and

WHEREAS, the plan will have significant impacts that cannot be fully mitigated to less than significant, and MTC and ABAG have prepared a Statement of Overriding Considerations in compliance with Public Resources Code § 21081 and CEQA Guidelines § 15093, included in the CEQA Findings, which concludes that specific economic, legal, social, technological, and other benefits of the plan outweigh the potentially significant and unavoidable impacts identified in the Final Program EIR; and

WHEREAS, each of the specific economic, legal, social, technological, and other benefits of the plan included in the Statement of Overriding Considerations is independently sufficient to justify approval of the plan; and

WHEREAS, MTC and ABAG have prepared a Mitigation Monitoring and Reporting Program (attached hereto as Attachment C and incorporated herein as though set forth at length) in compliance with Public Resources Code § 21081.6 and CEQA Guidelines § 15097, to ensure compliance with the mitigation measures identified in the Final Program EIR during plan implementation to the extent feasible; and

WHEREAS, certification of the Final Program EIR is scheduled for consideration by the ABAG Executive Board on March 19, 2026, and by the MTC Commission on March 25, 2026, and public notice for each meeting was circulated to the public in accordance with applicable public noticing requirements;

WHEREAS, prior to taking action on the Final Program EIR, MTC and ABAG have heard, been presented with, reviewed, and considered all of the information and data in the administrative record, including the Final Program EIR, and all oral and written evidence presented to it during all meetings and hearings;

WHEREAS, all other legal prerequisites to the adoption of this Resolution have occurred; now, therefore, be it

RESOLVED, that MTC hereby finds and certifies that the foregoing recitals are true and correct and incorporated herein by this reference; and be it further

RESOLVED, that MTC makes and adopts the CEQA Findings required by Public Resources Code § 21081 and CEQA Guidelines § 15091, which are attached hereto as Attachment B and incorporated herein by this reference; and be it further

RESOLVED, that MTC finds, based on the Final Program EIR and the whole of the administrative record, that the plan will have significant impacts that cannot be fully mitigated to less than significant; and be it further

RESOLVED, that MTC adopts the Statement of Overriding Considerations as required by CEQA Guidelines § 15093, which describes numerous specific economic, legal, social, technological, and other benefits of the plan each of which is independently sufficient to justify

approval of the plan, and which included as part of the CEQA Findings (Attachment B) and incorporated herein by this reference; and be it further

RESOLVED, that MTC finds that the Final Program EIR satisfies all applicable requirements of CEQA and the State CEQA Guidelines; and be it further

RESOLVED, that MTC finds that the Final Program EIR sufficiently analyzes both the feasible mitigation measures necessary to avoid or substantially lessen the plan's potentially significant environmental impacts and a reasonable range of alternatives capable of eliminating or reducing these effects in accordance with CEQA and the State CEQA Guidelines; and be it further

RESOLVED, that MTC finds that MTC and ABAG staff prepared the Final Program EIR, consisting of: (1) the Draft Program EIR, including all appendices and revisions thereto; (2) comments and recommendations received on the Draft Program EIR, including a list of persons, organization, and public agencies commenting on the Draft Program EIR; (3) responses by MTC and ABAG to significant environmental points raised in the review and consultation process, including Master responses to comments; (4) revisions to the Draft Program EIR; and (5) all appendices to the Final Program EIR; and be it further

RESOLVED, that MTC, as a decision-making body, certifies that the Program EIR (attached hereto as Attachment A and incorporated herein by this reference) has been completed in compliance with CEQA and the State CEQA Guidelines; and be it further

RESOLVED, that MTC certifies that it has reviewed and considered the information contained in the Final Program EIR prior to approving the plan; and be it further

RESOLVED, that MTC certifies that the Final Program EIR represents the independent judgement and analysis of MTC and ABAG; and be it further

RESOLVED, that MTC direct staff to immediately (within five working days): (a) file a Notice of Determination documenting these decisions (CEQA Guidelines § 15094); (b) retain a copy of the certified Final Program EIR as a public record; and (c) provide a copy of the certified

Final Program EIR to the planning agencies of all member jurisdictions and each responsible agency (CEQA Guidelines § 15095).

METROPOLITAN TRANSPORTATION COMMISSION

Sue Noack, Chair

This resolution was entered into by the Metropolitan Transportation Commission at a special meeting of the Commission held in San Francisco, California and at other remote locations on March 25, 2026.

Date: March 25, 2026
W.I.: 1121
Referred by: Planning

Attachment A
MTC Resolution No. 4749

Final Environmental Impact Report

The Final Environmental Impact Report (EIR)

is on file in the offices of the Metropolitan

Transportation Commission, Bay Area Metro Center,

375 Beale Street, Suite 800, San Francisco, CA 94105.

The Final EIR can also be viewed online at

https://planbayarea.org/2050/environmental-impact-report-eir.

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Date: March 25, 2026
W.I.: 1121
Referred by: Planning

Attachment B
MTC Resolution No. 4749

CEQA Findings and Facts in Support of Findings and Statement of Overriding Considerations

The adopted CEQA Findings and Facts in Support of Findings and Statement of Overriding Considerations (CEQA Findings) is on file in the offices of the Metropolitan Transportation Commission, Bay Area Metro Center, 375 Beale Street, Suite 800, San Francisco, CA 94105.

The adopted CEQA Findings can also be viewed online at https://planbayarea.org/2050/environmental-impact-report-eir.

Date: March 25, 2026
W.I.: 1121
Referred by: Planning

Attachment C
MTC Resolution No. 4749

Mitigation Monitoring and Reporting Program
for Plan Bay Area 2050+

The adopted Mitigation Monitoring and Reporting Program (MMRP)

is on file in the offices of the Metropolitan

Transportation Commission, Bay Area Metro Center,

375 Beale Street, Suite 800, San Francisco, CA 94105.

The adopted MMRP can also be viewed online at

https://planbayarea.org/2050/environmental-impact-report-eir.

PLAN BAY AREA 2050+

FINAL ENVIRONMENTAL IMPACT REPORT

STATE CLEARINGHOUSE #2025010348

MARCH 2026

ASSOCIATION OF BAY AREA GOVERNMENTS

METROPOLITAN TRANSPORTATION COMMISSION

Final Environmental Impact Report

for

PLAN BAY AREA 2050+

Regional Transportation Plan (RTP)/ Sustainable Communities Strategy (SCS)

State Clearinghouse Number SCH# 2025010348

Prepared for:

Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

and

Association of Bay Area Governments
375 Beale Street, Suite 700
San Francisco, CA 94105

Prepared by:

Ascent Environmental, Inc.
455 Capitol Mall, Suite 300
Sacramento, CA 95814

March 2026

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A	Comment Letters

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LIST OF ABBREVIATIONS

ABAG	Association of Bay Area Governments
ACC	Advanced Clean Cars
BART	Bay Area Rapid Transit
BCDC	San Francisco Bay Conservation and Development Commission
BIA	Building Industry Association of the Bay Area
BLS	Bureau of Labor Statistics
CAA	federal Clean Air Act
CAFE	Corporate Average Fuel Economy
CARB	California Air Resources Board
CBE	Communities for a Better Environment
CEC	California Energy Commission
CEDS	Comprehensive Economic Development Strategies
CEQA	California Environmental Quality Act
CNEL	community noise equivalent level
CPUC	California Public Utilities Commission
CTA	county transportation agency
dB	decibels
dBA	A weighted decibels
DOF	California Department of Finance
Draft EIR	Plan Bay Area 2050+ Draft EIR
EPA	U.S. Environmental Protection Agency
EPC	Equity Priority Community
ESA	environmental site assessment
GHG	greenhouse gas
GSA	Groundwater Sustainability Agency
GSP	Groundwater Sustainability Plan
HCD	California Department of Housing and Community Development
HCP	habitat conservation plan
IPCC	Intergovernmental Panel on Climate Change
ISO	Independent System Operator

MERV	minimum efficiency reporting value
MPO	metropolitan planning organization
MTC	Metropolitan Transportation Commission
$MTCO_2e$	metric tons of carbon dioxide equivalent
NOA	Notice of Availability
NO_X	oxides of nitrogen
OBAG	One Bay Area Grant
OPC	California Ocean Protection Council
PDA	Priority Development Area
PeMS	Caltrans Performance Measurement System
plan	Plan Bay Area 2050+
$PM_{2.5}$	fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less
PM_{10}	respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less
PPP	Public Participation Plan
RHNA	Regional Housing Needs Allocation
RHND	Regional Housing Need Determination
RTP	Regional Transportation Plan
RTPA	regional transportation planning agency
RWQCB	regional water quality control board
SAPMap	Shoreline Adaptation Project Map
SB	Senate Bill
SCS	Sustainable Communities Strategy
SGMA	Sustainable Groundwater Management Act
SJCOG	San Joaquin Council of Governments
Subregional Plan	Subregional Shoreline Adaptation Plan
SWAA	Survey of Working Arrangements and Attitudes
TAZ	Traffic Analysis Zone
TOC	Transit-Oriented Communities
UWMP	urban water management plan
VMT	vehicle miles traveled
YSAQMD	Yolo-Solano Air Quality Management District

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1 INTRODUCTION

This Final Environmental Impact Report (EIR) has been prepared on behalf of the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) in accordance with the California Environmental Quality Act (CEQA). This EIR analyzes the environmental impacts of the adoption and implementation of the proposed Plan Bay Area 2050+ (plan), which is the update to Plan Bay Area 2050, the Regional Transportation Plan (RTP) and the Sustainable Communities Strategy (SCS) for the San Francisco Bay Area.

1.1 PURPOSE

This Final EIR has been prepared in compliance with the CEQA Statutes and Guidelines. It responds to comments on, and provides revisions to, the Draft EIR published October 20, 2025.

This document, combined with the Draft EIR, constitute the Final EIR on Plan Bay Area 2050+. This Final EIR revises and incorporates by reference the Draft EIR, which is available as a separately bound document from MTC.

The primary purposes of this Final EIR are to respond to written and oral comments on the environmental analysis in the Draft EIR received during the public review period, and to revise the Draft EIR as needed. The public review period for the Draft EIR (State Clearinghouse No. 2025010348) was from October 20, 2025, through 5 p.m., December 18, 2025. A list of the individuals, agencies, and organizations that commented on the Draft EIR and copies of the written and oral comments are included in Chapter 2 of this document. Responses to comments are also provided in Chapter 2.

Some comment letters raised points relating to both Plan Bay Area 2050+ (“plan”) and the Draft EIR; in accordance with CEQA, this Final EIR provides detailed responses to comments raising significant environmental issues related to the analysis in the Draft EIR and provides general responses to comments on the plan. The MTC Commission and ABAG Executive Board will consider all comments received as part of their overall consideration of the proposed plan. In response to some comments, revisions and refinements have been made to the Draft EIR environmental analysis and mitigation measures; these revisions are included in Chapter 3 of this Final EIR.

The Draft EIR discloses significant environmental effects of implementing the plan, identifies feasible measures to minimize the significant effects, and provides a comparative analysis of reasonable alternatives to the plan. “CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters....” Rather, a Lead Agency, “need only respond to significant environmental issues and do[es] not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR” (CEQA Guidelines Section 15204(a)).

Information provided in the responses to comments and in the revisions to the Draft EIR clarifies and amplifies the analysis presented in the Draft EIR. No significant new information, as defined by CEQA (CEQA Guidelines Section 15088.5), was added that would trigger recirculation of the Draft EIR, as explained in responses to comments in Chapter 2, “Comments and Responses on the Draft EIR.” This is also explained in the CEQA Findings and Facts in Support of Findings prepared as required in Public

Resources Code Section 21002, which includes the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) Specifically, there are no new significant environmental impacts, nor a substantial increase in the severity of any significant impact, identified in the comments or responses that were not already identified in the Draft EIR.

The Final EIR is available online at https://planbayarea.org/plan-bay-area-2050-plus and arrangements to access the report can be made via email to info@bayareametro.gov or via telephone at 415-778-6757. The Draft EIR and Draft Plan Bay Area 2050+ are available for viewing at select Bay Area libraries, listed in Section 1.2, below. The library reference desk staff will let you know how you can access the documents on one of their public computers.

1.2 DRAFT EIR PUBLIC REVIEW PROCESS

The Draft EIR was released for public review on October 20, 2025. The review process provided the public with opportunity to review the document and make comments. The Notice of Availability (NOA) of the Draft EIR and public outreach efforts are described below:

- On October 16, 2025, MTC and ABAG issued a news release focused on the availability of the Draft EIR, as well as upcoming virtual public meetings and public hearings on the Draft Plan Bay Area 2050+ and the Draft EIR. The news release also was published on the MTC (mtc.ca.gov), Plan Bay Area (planbayarea.org) and ABAG (abag.ca.gov) websites, in English, Chinese, and Spanish.
- On October 17, 2025, MTC and ABAG mailed the NOA to public agencies and the 101 local jurisdictions. In addition, the NOA was mailed to non-profit/private organizations and tribes.
- On October 17, 2025, MTC and ABAG emailed the NOA to contacts from Federal, State, regional and local agencies; interested organizations; and interested individuals as identified in MTC's contact database.
- On October 17, 2025, MTC and ABAG issued an email communication announcing the opportunity to review and submit comments on the Draft EIR to contacts interested in Plan Bay Area 2050+.
- On October 17, 2025, MTC and ABAG uploaded the Notice of Completion, NOA, and Draft EIR to the Governor's Office of Planning and Research State Clearinghouse CEQA Submit website.
- MTC and ABAG posted the Draft EIR on the Plan Bay Area website: https://planbayarea.org on October 16, 2025. The Draft EIR was available for viewing online or downloading.
- MTC and ABAG filed a Notice of Availability with the nine County Clerks (Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma) in the Bay Area on October 20, 2025, for posting.
- MTC and ABAG posted legal notices about the availability of the Draft EIR and upcoming public hearings on the Draft Plan Bay Area 2050+ and Draft EIR in the newspapers and publications listed below:
  - *Contra Costa Times* | October 9, 2025
  - *La Opinion de la Bahía* (in Spanish) | October 12, 2025
  - *Marin Independent Journal* | October 9, 2025
  - *Napa Valley Register* | October 16, 2025

- *San Francisco Examiner* | October 08, 2025
- *San José Mercury News* | October 10, 2025
- *San Mateo County Times* | October 9, 2025
- *Santa Rosa Press Democrat* | October 9, 2025
- *Sing Tao* (in Chinese) | October 9, 2025
- *Solano County Daily Republic* | October 8, 2025

- MTC made the NOA and the complete Draft EIR document available for viewing to the following Bay Area public libraries:
  - Alameda County
    - Fremont Main Library (2400 Stevenson Boulevard, Fremont)
    - Oakland Public Library (125 14th Street, Oakland)
  - Contra Costa County
    - Contra Costa County Central Library (1750 Oak Park Boulevard, Pleasant Hill)
  - Marin County
    - Civic Center Library (3501 Civic Center Drive, Room 427, San Rafael)
  - Napa
    - Napa County Library, Main Branch (580 Coombs Street, Napa)
  - Santa Clara County
    - Dr. Martin Luth King Jr. Library (150 E. San Fernando Street, San Jose)
    - Santa Clara County Law Library (360 North First Street, San Jose)
  - San Francisco County
    - San Francisco Public Library, Main Branch (100 Larkin Street, San Francisco)
    - MTC-ABAG Library (375 Beale Street, Suite 800, San Francisco)
  - San Mateo County
    - San Mateo County Library Law Library (710 Hamilton Street, Redwood City)
    - San Mateo Public Library (55 West Third Avenue, San Mateo)
  - Solano
    - Fairfield Civic Center Library (1150 Kentucky Street, Fairfield)
  - Sonoma County
    - Sonoma County Law Library (2604 Ventura Avenue, Santa Rosa)
    - Sonoma County Public Library (211 E Street, Santa Rosa)
- MTC and ABAG staff sent out copies of the Draft EIR upon request.

The public review period lasted 59 calendar days and closed at 5 p.m. on December 18, 2025. MTC and ABAG accepted written comments via mail, fax, e-mail, and online via the Plan Bay Area website through December 18, 2025. MTC and ABAG hosted three public hearings to receive oral comments on November 14, December 3, and December 4, 2025. Verbal comments made at these meetings were transcribed and are included in this Final EIR as official Draft EIR comments.

1.3 DECISION-MAKING PROCESS

Before taking action on the proposed plan, the MTC Commission and ABAG Executive Board must certify the EIR and make the following findings of fact:

- the Final EIR has been completed in compliance with CEQA,
- the MTC Commission and ABAG Executive Board reviewed and considered the information contained in the Final EIR prior to considering the proposed plan, and
- the Final EIR reflects the independent judgment and analysis of the Commission and Board (CEQA Guidelines Section 15090).

The MTC Commission and ABAG Executive Board must further find, based on the standards provided in Section 15088.5 of the CEQA Guidelines, that recirculation of the Draft EIR is not required.

Prior to approving the plan, MTC and ABAG must also prepare one or more findings of fact for each significant environmental impact identified in the document (CEQA Guidelines Sections 15091 and 15092). These findings must state that either:

- the plan has been changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact,
- changes to the plan are within another agency's jurisdiction and have been or should be adopted, or
- specific considerations make mitigation measures or alternatives infeasible.

For impacts identified in the EIR that cannot be reduced to a level that is less than significant, MTC and ABAG may issue a Statement of Overriding Considerations (CEQA Guidelines 15093) if specific legal, social, economic, or other factors justify approval of the plan, despite potential resulting unavoidable adverse environmental effects.

Following certification of the Final EIR and final action on the plan, MTC and ABAG will issue a CEQA Notice of Determination.

1.4 FINAL EIR ORGANIZATION

This Final EIR is organized as follows:

Chapter 1, "Introduction," describes the primary purposes of this Final EIR, as well as the Draft EIR public review process that took place and the decision-making process that will take place before MTC and ABAG take action on the plan.

Chapter 2, "Comments and Responses on the Draft EIR," lists all agencies, organizations, and persons who submitted either written or oral comments on the Draft EIR and reproduces and numbers all comment letters and transcripts. Chapter 2 also provides responses to comments, including master responses to similar comments raised by several different agencies, organizations, and individuals.

Chapter 3, "Revisions to the Draft EIR," presents revisions to the Draft EIR text made in response to comments, or to amplify, clarify or make minor modifications or corrections.

Chapter 4, "References," identifies the documents used as sources for the Final EIR.

Chapter 5, "Report Preparers," identifies the lead agency contacts as well as the preparers of this Final EIR.

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2 COMMENTS AND RESPONSES ON THE DRAFT EIR

This chapter contains copies of the written and oral comments received on the Plan Bay Area 2050+ Draft EIR ("Draft EIR"), outlined in the table below, as well as responses to these comments. MTC and ABAG received 117 EIR comment letters and transcripts during the comment period, from October 20, 2025, through December 18, 2025. As required by the California Environmental Quality Act (CEQA), MTC and ABAG evaluated all comments on environmental issues (CEQA Guidelines Section 15088(a)). This Final EIR fulfills MTC's and ABAG's obligation to provide written responses to all comments raising significant environmental issues received during the public comment period (CEQA Guidelines Section 15088(a)).

Table 2-1 provides a list of all agencies, organizations, and persons who submitted comments on the Draft EIR during the public review period. Each letter and each comment within a letter has been given an identification number, based on the order in which they were received. Responses are numbered so that they correspond to the associated comment. Where appropriate, responses are cross-referenced between letters or to a master response. Master responses are provided following Table 2-1 for topics that are raised by multiple commenters.

Some of the comments received on the Draft EIR do not address environmental issues or the adequacy of the Draft EIR and instead offer suggestions or preferences for the plan. While MTC and ABAG are not obligated by CEQA to provide detailed responses to comments that address comments on the plan or that do not relate to the adequacy of the environmental analysis, responses are provided to explain and clarify portions of the proposed plan and planning process. Comments are noted and included in this Final EIR, which will be reviewed by the decision makers.

Table 2-1: List of Commenters

Letter No.	Commenter	Date
Agencies		
A1	Napa County, Brian Bordona, Director Building and Environmental Services	December 8, 2025
A2	City of Pacifica, Kevin Woodhouse, City Manager	December 9, 2025
A3	City of Mill Valley, Max Perry, Mayor	December 10, 2025
A4	City of Pleasant Hill, Troy Fujimoto, City Planner	December 12, 2025
A5	East Bay Municipal Utilities District, David Rehnstrom, Manager of Water Distribution	December 15, 2025
A6	City of Lafayette, Carl Anduri, Mayor	December 15, 2025
A7	Alameda County Water District, Ed Stevenson, General Manager	December 16, 2025
A8	California Department of Transportation, Cameron Oakes, Deputy District Director	December 16, 2025
A9	San Mateo Local Agency Formation Commission, Sarah Flamm, Management Analyst	December 17, 2025
A10	City of Orinda, Lashun Cross, Planning Director	December 17, 2025
A11	City of Concord, Valerie Barone, City Manager	December 17, 2025
A12	City of Foster City, Sofia Mangalam, Director of Community Development Department	December 17, 2025

Letter No.	Commenter	Date
A13	San Francisco Bay Conservation and Development Commission, Lisa Herron, Principal Waterfront Planner	December 18, 2025
A14	City of Palo Alto, Jonathan Lait, Director	December 18, 2025
A15	Transportation Authority of Marin, Anne Richman, Executive Director	December 18, 2025
A16	Town of Danville, Tai Williams, Town Manager	December 18, 2025
A17	City of Livermore, John Marchand, Mayor	December 18, 2025
A18	Delta Stewardship Council, Jeff Henderson, Deputy Executive Director	December 18, 2025
A19	City of Pleasanton, Gerry Beaudin, City Manager	December 18, 2025
A20	Alameda County, Sandra Rivera, Community Development Agency Director	December 18, 2025
A21	City of San Rafael, Kate Colin, Mayor	December 18, 2025
A22	Solano County, Matt Tuggle, Principal Engineer	December 18, 2025
A23	City of Cupertino, Kitty Moore, Mayor	December 18, 2025
A24	Marin County, Derek Johnson, County Executive	December 18, 2025
A25	San Mateo County, Bharat Singh, Planning Services Manager	December 18, 2025
A26	City of Brentwood, Harold Duffey, City Manager	December 18, 2025
A27	City of Milpitas, Lillian VanHua, Principal Planner	December 18, 2025
A28	City of Walnut Creek, Kevin Wilk, Mayor	December 19, 2025
A29	San Francisco Water Power Sewer, Jennifer Lee	December 10, 2025
Organizations		
O1	Catalysts for Local Control, Susan Kirsch	November 13, 2025
O2	SHIFT Bay Area, Gregg Dieguez	November 15, 2025
O3	Long Heritage, Shelly Long	November 15, 2025
O4	Construction Trades Workforce Initiative, Beli Acharya	December 10, 2025
O5	Central Neighborhood Association of San Mateo, Laurie Watanuki	December 15, 2025
O6	Neighborhoods United San Francisco, Lori Brooke	December 16, 2025
O7	Coalition for San Francisco Neighborhoods, Deborah Murphy	December 17, 2025
O8	Citizen Marin, Amy Kalish	December 17, 2025
O9	Catalysts for Local Control, Susan Kirsch	December 18, 2025
O10	Central Neighborhood Association of San Mateo, Laurie Watanuki	December 18, 2025
O11	Save Lafayette, Elizabeth Henry	December 18, 2025
O12	Citizens Committee to Complete the Refuge, Carin High, Gail Raabe, and Arthur Feinstein	December 18, 2025
O13	Bay Area Transportation Working Group, Gerald Cauthen	December 18, 2025
O14	The WREN Group, Jones and Ralph Miller	December 18, 2025
O15	San Francisco Water Power Sewer, Jennifer Lee	December 10, 2025
Individuals -Emails		
I1	Victor Lui	October 20, 2025
I2	Sharon Steckline	November 10, 2025
I3	Ann Mannheimer	November 10, 2025

Letter No.	Commenter	Date
I4	Sandra Bushmaker	November 13, 2025
I5	Robert Cox 1	November 13, 2025
I6	Robert Cox 2	November 13, 2025
I7	William Cimino	November 18, 2025
I8	Nick Waranoff 1	November 19, 2025
I9	Kirke Hasson	November 21, 2025
I10	Susana Stanton Acuna 1	November 28, 2025
I11	Susana Stanton Acuna 2	November 28, 2025
I12	Kitty Moore	December 2, 2025
I13	Laura Watanuki	December 3, 2025
I14	Susan Hopp	December 5, 2025
I15	Ann Duwe	December 9, 2025
I16	Nick Waranoff 2	December 10, 2025
I17	Sandra Bushmaker 2	December 11, 2025
I18	Benedetto Cico	December 14, 2025
I19	Jeff Wells	December 14, 2025
I20	Mike Bullock 1	December 15, 2025
I21	Mike Bullock 2	December 15, 2025
I22	Jinesse Reynolds	December 16, 2025
I23	Mei-Ling Stefan 1	December 16, 2025
I24	Paul Melmed	December 17, 2025
I25	James Holmes	December 17, 2025
I26	Mei-Ling Stefan 2	December 17, 2025
I27	Brian Swanson 1	December 18, 2025
I28	Tomas Alan Rubin	December 18, 2025
I29	Gregg A. Dieguez 1	December 18, 2025
I30	Gregg A. Dieguez 2	December 18, 2025
I31	Dan Haggerty	December 18, 2025
I32	Francisco Pereira	December 18, 2025
I33	Anne Gray	December 18, 2025
I34	Liang Chao 1	December 18, 2025
I35	Liang Chao 2	December 18, 2025
I36	Liang Chao 3	December 18, 2025
I37	Liang Chao 4	December 18, 2025
I38	Liang Chao 5	December 18, 2025
I39	Brian Swanson 2	December 18, 2025
I40	Liang Chao 6	December 18, 2025
I41	Liang Chao 7	December 18, 2025
Public Hearings		

Letter No.	Commenter	Date
PH1	Mei-Liang Stefan	November 14, 2025
PH2	Susan Kirsch	November 14, 2025
PH3	Ken Bukowski	November 14, 2025
PH4	Elizabeth Henry	November 14, 2025
PH5	Tom Rubin	November 14, 2025
PH6	Mei-Liang Stefan	November 14, 2025
PH7	Gregg Dieguez	November 14, 2025
PH8	Ann Duwe	November 14, 2025
PH9	Dan t	November 14, 2025
PH10	Robert Cox	November 14, 2025
PH11	Susan Kirsch	December 3, 2025
PH12	Terrie Green	December 4, 2025
PH13	Mei-Liang Stefan	December 4, 2025
PH14	Anthony Nachor	December 4, 2025
Individuals -Online Forms		
F1	No Name	October 20, 2025
F2	Harold Cummings	October 23, 2025
F3	Janet Hamerson	October 24, 2025
F4	Alan Marling 1	November 5, 2025
F5	Alan Marling 2	November 5, 2025
F6	Angela Gianni	December 13, 2025
F7	John Arens	December 15, 2025

MTC and ABAG appreciate the time and effort taken by commenters to express their views and concerns as a part of this process. These views and recommendations will be considered by MTC staff in developing the staff recommendation, and by the MTC Commission and ABAG Executive Board in their deliberations and decision-making regarding certification of the EIR and adoption of the proposed plan.

Section 15088(a) of the CEQA Guidelines directs that lead agencies must prepare written responses to those comments received during the Draft EIR comment period that raise "significant environmental issues." While MTC and ABAG are under no obligation to respond to comments received after the close of the comment period (Public Resources Code Section 21091(d)(2)(A); CEQA Guidelines Section 15088(a)), this Final EIR also includes responses to comments received through December 19, 2025. At the time this Final EIR was drafted, the last comment received that met this criterion was dated December 19, 2025. MTC and ABAG have opted to take this broad approach to facilitate the public process, document the exchange of information, and provide important information about considerations relevant to the proposed project.

Where a comment provides the opinion, preference, or observation of the commenter (e.g., opinions on the merits of the project that are unrelated to its environmental impacts), without substantiation, this is acknowledged for the record, and no further response is provided. All comments, whether substantiated by facts or simply reflecting the position of the commenter, will be considered by the MTC Commission and ABAG Executive Board.

Where a comment provides substantial evidence in support of a conclusion different from that reached in the Draft EIR, MTC and ABAG and their expert consultants have considered the evidence and responded accordingly. Section 15151 of the State CEQA Guidelines (and related judicial opinions) directs that in situations where there is a disagreement between experts, the EIR should summarize the main points of disagreement for consideration by the decision makers in reaching their decision. Disagreements between experts do not preclude the process from moving forward, nor do they preclude the Commission and Executive Board from considering the evidence and making their decision(s). Environmental impact analysis that occurs through CEQA is just one factor to be considered during project review. Separate from the CEQA process, MTC and ABAG will analyze the "merits" of the plan. MTC and ABAG have the ability to approve the plan, deny it, or approve it with conditions.

The comments received on the Draft EIR and the responses to those comments are provided below. The comment letters are reproduced verbatim in their entirety. No edits have been made to the original comments, and spelling, grammatical, and other errors have been retained.

2.1 MASTER RESPONSES

Some comments raised similar issues. Rather than respond individually to recurring comments, master responses have been developed to address the comments comprehensively. Master responses are provided for the following topics:

(1) Regional growth forecast for Plan Bay Area 2050+;

(2) Mitigation Measures in the EIR;

(3) Plan Bay Area 2050+ EIR Alternatives;

(4) Program Level Document;

(5) Building Industry Association of the Bay Area Settlement Agreement;

(6) Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources;

(7) Regional Coordination, Partnerships, and Local Implementation;

(8) Revisions to Plan Strategies, Project Lists, and Implementation Priorities; and

(9) Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+.

A reference to the relevant master response is provided, as appropriate, in responses to individual comments.

2.1.1 Master Response 1: Regional Growth Forecast

Numerous commenters raised questions regarding the Regional Growth Forecast estimates used in the Draft Plan Bay Area 2050+ and Draft EIR for Plan Bay Area 2050+, including the basis for projected population, jobs, and housing growth; whether the forecast reflects recent trends such as remote work and post-COVID migration changes; and how the Regional Growth Forecast relates to the RHNA. Some commenters also questioned whether the forecast represents a "status quo" projection or instead reflects assumptions about future policy and economic conditions. The following addresses these issues related to the Regional Growth Forecast, including the statutory and legal requirements governing the

forecast, the methodology and update process used for Plan Bay Area 2050+, and the relationship between the Regional Growth Forecast and RHNA.

STATUTORY AND LEGAL REQUIREMENTS FOR THE REGIONAL GROWTH FORECAST

Plan Bay Area 2050+ serves as the Bay Area's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS). The Regional Growth Forecast of population, households, and jobs is a foundational input to the plan and its technical analyses and is used to support long-range regional planning, including transportation investments and land use assumptions over the planning horizon. As such, the forecast must comply with applicable federal and state planning requirements.

Federal law requires metropolitan planning organizations to prepare a long-range RTP (20 or more years) that promotes consistency between transportation improvements and state and local planned growth, housing, and economic development patterns (23 US Code 134(h)). State law, including Senate Bill (SB) 375, further requires that the SCS identify areas within the region sufficient to house the region's projected population—including all economic segments—over the planning period (Government Code Section 65080(b)(2)).

Consistent with these statutory requirements, the 2014 Settlement Agreement with the Building Industry Association, discussed in more detail in Master Response 5, establishes specific requirements relevant to the methodology used to develop the Regional Growth Forecast. These include that ABAG and MTC (1) cannot assume housing growth "spills over" into the megaregion and must accommodate projected growth within the nine-county Bay Area, (2) cannot rely solely on historical housing production trends but must consider both existing and future housing needs, and (3) must update and adopt the forecast methodology through a public process during major plan updates on an approximately eight-year cadence. Importantly, the settlement provisions are not a growth mandate. Instead, they operationalize the statutory requirement in SB 375 that the SCS identify areas sufficient to house the projected regional population across all income levels.

Because of these statutory requirements, the Regional Growth Forecast is not intended to be a simple extrapolation of recent trends. Rather, it is developed to support long-range planning within a defined policy and legal framework and to inform regional investments and strategies. The Plan Bay Area 2050+ Forecasting and Modeling Report offers additional historical context on the evolvement of the Regional Growth Forecast within this statutory, legal, and policy framework.

REGIONAL GROWTH FORECAST METHODOLOGY

The Regional Growth Forecast methodology currently in use was developed during Plan Bay Area 2050, the last major update to the RTP/SCS, and meets federal and state statutory requirements, as well as the ongoing applicable procedural and disclosure requirements of the 2014 BIA settlement agreement. It was developed collaboratively with a consultant and a technical advisory committee and was adopted by the ABAG Executive Board in September 2019. The Plan Bay Area 2050+ Forecasting and Modeling Report provides additional technical details on the adopted methodology.

The methodology uses the REMI (Regional Economic Models, Inc.) Policy Insight+ model to forecast integrated dynamics across population, labor markets, employment, and economic competitiveness relative to other regions. The methodology is designed to capture the relationship between demographic change and economic performance, including industry structure, productivity, competitiveness, export propensity, labor supply and demand, and related factors. It also considers the effects of recently adopted affordable housing investments and zoning changes that support housing production.

This approach differs from other forecasting tools and approaches, including projections prepared by the California Department of Finance (DOF) for state-level planning. DOF's population projections are designed as baseline, status-quo oriented forecasts. They use a cohort component model that starts with the prior year's population and adds natural increase (births minus deaths) and net migration. DOF notes that its projections do not incorporate potential changes in policy affecting migration, education, housing, or transportation, even though such changes could significantly alter long-term population outcomes. Likewise, unforeseen technological or productivity shifts are not reflected.

In contrast, the regional growth forecast used in Plan Bay Area 2050+ is explicitly policy informed. It is designed to fulfill federal and state requirements of the RTP/SCS and provides a consistent analytical basis for evaluating regional strategies over the planning horizon. As a result, the regional growth forecast incorporates key policy directions aimed at maintaining the region's strong economy over the long term while building a healthier housing market.

PLAN BAY AREA 2050+: FORECAST UPDATE TO REFLECT RECENT TRENDS

Commenters also raised concerns that the growth forecast may not reflect recent demographic and economic shifts, including post-COVID changes to migration, remote work, and evolving labor market conditions. For Plan Bay Area 2050+, which is a minor update to the adopted plan, MTC and ABAG staff carried forward the previously adopted Regional Growth Forecast methodology but also simultaneously updated key forecast inputs using the most recent available data at the time of the update.

Staff evaluated trends in national population outlook, migration and immigration, fertility and mortality, employment recovery patterns, and productivity. Using updated data sources, including U.S. Census Bureau and Congressional Budget Office information, the forecast update resulted in a reduced long-term outlook relative to Plan Bay Area 2050, including a decrease of approximately 750,000 people and 250,000 households by 2050. On the employment side, the updated forecast reflects shifts in anticipated industry composition, including relatively higher projections for technology, health, education services, and manufacturing, and lower projections for utilities, leisure and hospitality, and finance. The Plan Bay Area 2050+ Forecasting and Modeling Report provides additional details on the strong employment growth outlook.

The forecast update work was conducted in fall 2023 and first presented publicly at the Plan Bay Area 2050+ Webinar in October 2023. The updated forecast was subsequently shared through briefings with MTC and ABAG committees, the MTC Commission, and the ABAG Executive Board through January 2025, at which point it was incorporated into the Final Blueprint action item approved by MTC and ABAG.

The regional growth forecast was developed in consultation with the Center for Continuing Study of the California Economy, with input and review from a technical advisory committee of experts as well as from ABAG and MTC advisory committees. The technical advisory committee included six Bay Area economists; three experts from DOF (a chief economist, senior economist and demographer); three megaregion representatives (from the Sacramento Area Council of Governments, San Joaquin Council of Governments and the University of the Pacific); and three experienced REMI users (from the Atlanta Regional Commission, a Michigan think tank and a Colorado nonprofit).

Staff met with the technical advisory committee in October 2018 and in May 2019 and sought additional input during development of the preliminary forecast through individual consultations and/or an additional meeting(s). In July 2019, ABAG and MTC staff also spoke with DOF and Housing and Community Development (HCD) staff to discuss methods for estimating households from population and housing unit estimates. Staff continued coordination with DOF, HCD and other experts to develop accurate counts of housing units and occupancy.

MTC and ABAG acknowledge that additional uncertainties and evolving conditions have emerged since the regional growth forecast update was finalized in September 2023. These include changes in federal immigration policy, as well as ongoing uncertainty about the long-term effects of remote work and automation on job growth and regional productivity. The Plan Bay Area 2050+ Forecasting and Modeling Report includes additional discussions on some of these factors. MTC and ABAG staff will continue to monitor these trends as additional data becomes available and consider them as part of future regional growth forecast methodology updates.

RELATIONSHIP BETWEEN THE REGIONAL GROWTH FORECAST AND RHNA PROCESS

Several comments conflated the Plan Bay Area 2050+ regional growth forecast with the first two steps (Determination and Allocation) of the Regional Housing Needs Allocation (RHNA) process. Commenters expressed concern that the regional growth forecast would directly influence the 7th Cycle Regional Housing Need Determination (RHND).

The regional growth forecast prepared for Plan Bay Area 2050+ has no influence on the 7th Cycle RHNA; that process will occur in parallel with the next iteration of Plan Bay Area. Furthermore, under housing element law, the State—through HCD and leveraging DOF data—determines the regionwide RHND, and ABAG then allocates that determination to jurisdictions as the RHNA.

The RHND is the total number of housing units that HCD determines the region must plan for to accommodate all income levels over an eight-year planning period. The most recent RHND was issued to the region for Cycle 6 in June 2020, for 441,776 units.

The Bay Area RHNA is the process by which ABAG and subregional partners distribute that total regional housing need determination among individual cities and counties, assigning each local government its specific share of the housing units (of the RHND) they must zone for. The most recent RHNA plan was adopted by ABAG in December 2021.

REGIONAL GROWTH FORECAST AND THE DRAFT EIR

The Draft EIR evaluates the potential environmental impacts associated with the proposed plan's forecasted development pattern (the "land use growth footprint"). As described in Chapter 2, "Project Description" of the Draft EIR, the proposed plan's land use growth footprint represents the development or redevelopment of parcels simulated to accommodate the regional growth forecast. The EIR analyzes the physical environmental impacts associated with implementation of the proposed plan as a whole, as described further in Chapter 3.1, "Approach to the Analysis" of the Draft EIR and "Master Response 4: Program Level Document." The potential direct and indirect physical impacts of the proposed plan, including those related to forecasted land use growth, are analyzed across resource topics, as described throughout Draft EIR Sections 3.2 through 3.15.

FUTURE UPDATES: PLAN BAY AREA 2060

Finally, MTC and ABAG are committed to continuing to improve and refine the regional growth forecast methodology in the next major plan update, tentatively referred to as Plan Bay Area 2060, while fulfilling federal, state, and legal settlement requirements. The next major update to Plan Bay Area is anticipated to begin in late 2026 and will include an update to the regional growth forecast methodology. Staff anticipates convening a technical advisory committee, updating the forecasting approach, incorporating updated data, and evaluating emerging drivers that may affect long-term regional growth, such as federal immigration policy, artificial intelligence, fertility trends, state housing policies, and remote work patterns. Staff also anticipates evaluating alternative scenarios to better account for uncertainty in key

planning assumptions; the next iteration of the long-range planning process will provide further opportunities for public and stakeholder engagement.

2.1.2 Master Response 2: EIR Mitigation Measures

Numerous commenters raised concerns regarding mitigation measures included throughout the Draft EIR. Multiple comments opined that because some of the EIR mitigation measures were written as lists of actions providing choices for implementation, they would be considered deferred mitigation. Others focused on the "if feasible" language in the mitigation measures and noted that mitigation should be enforceable. Commenters also were concerned over the number of significant and unavoidable impacts in the Draft EIR, stating that mitigation should be improved to reduce the number of significant impacts. Finally, commenters focused on the funding mechanisms available to implement the EIR mitigation measures. The following addresses these issues related to mitigation measures in the Draft EIR, preceded by a discussion of general CEQA requirements for mitigation measures.

CEQA REQUIREMENTS

CEQA requires EIRs to describe feasible mitigation measures that could minimize significant adverse impacts (State CEQA Guidelines Section 15126.4). EIRs shall identify mitigation measures for each significant environmental effect identified in the EIR. Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. As stated in Section 15370 of the State CEQA Guidelines mitigation may include:

A) Avoiding the impact altogether by not taking a certain action or parts of an action.

B) Minimizing impacts by limiting the degree or magnitude of the action and its implementation.

C) Rectifying the impacts by repairing, rehabilitating, or restoring the impacted environment.

D) Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.

E) Compensating for the impact by replacing or providing substitute resources or environments, including through permanent protection of such resources in the form of conservation easements.

As included in State CEQA Guidelines Section 15126.4(1)(B):

> *Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will considered, analyzed, and potentially incorporated in the mitigation measure. Compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards.*

Importantly, for purposes of streamlined environmental review under SB 375, which Plan Bay Area 2050+ is intended to facilitate, the lead agency for a later project tiering from the Plan Bay Area 2050+ EIR must incorporate "all *feasible* mitigation measures" from the EIR. (Pub. Resources Code Section 21155.2; see

also Pub. Resources Code Section 21155.1 [requiring incorporation of "any applicable" mitigation measures from the Sustainable Communities Strategy (SCS) EIR].)

DEFERRED MITIGATION

Several comments raised concerns about the mitigation measures in the Draft EIR, which in some cases include a list of possible actions for implementing agencies to implement for future projects. Commenters were concerned that such mitigation is deferral under CEQA because mitigation provides a list of possible actions that implementing agencies "shall implement, where feasible and necessary." State CEQA Guidelines Section 15126.4(a)(1)(B) permits development of specific details of mitigation measures after project approval when it is infeasible or impractical to include those details during the project's environmental review as long as specific requirements are met, see "CEQA Requirements" above. As a program level document, specific projects under the proposed plan would be more fully defined at a later date, at which time specific details for mitigation would be developed when necessary.

This is contemplated by the CEQA statutes allowing for streamlined environmental review for projects consistent with an SCS. Those later projects are required to incorporate the mitigation measures from this EIR as applicable and feasible. (Public Resources Code Sections 21155.2, 21155.1.)

Pursuant to the State CEQA Guidelines, MTC and ABAG will commit themselves to the mitigation measures contained in the EIR, which pertain to development of future projects that are under the plan and that would be implemented by MTC and ABAG, through certification of the EIR and adoption of an MMRP. As described in more detail in Section 2.1.4, the programmatic nature of the analysis in the Draft EIR does not allow for a fixed description of the details of project-specific mitigation, because details related to the location, size, design, or setting of specific future projects are not precisely known.

For future projects under the jurisdiction of local lead agencies (not MTC or ABAG) development of tailored site-specific mitigation is neither timely nor feasible. In those instances where project specific information is unknown at this time, mitigation measures in the EIR include performance standards that the mitigation must meet and potential actions that can feasibly achieve the performance standards, consistent with State CEQA Guidelines Section 15126.4(a)(1)(B). For example, Mitigation Measure HAZ-4 on page 3.9-38 of the Draft EIR related to hazardous materials sites requires implementing agencies to "implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures)." Some of the performance based standards in the list of possible measures to implement include performing a records review to determine whether there is existing permitted use of hazardous materials or documented evidence of hazardous waste contamination on the project site and provide the results of this investigation to the implementing agency; preparation of a Phase I ESA in accordance with the American Society for Testing and Materials' E1527-05 standard for any project on or near a hazardous materials and/or waste site; and projects that prepare a Phase I ESA shall implement the recommendations contained in the report. Lead agencies could choose between these potential measures as feasible and applicable because they would all result in removal of hazardous materials from future project sites as the ultimate requirement, ensuring that development does not occur on hazardous materials sites. Therefore, mitigation measures in the EIR have been designed to provide lead agencies possible actions to implement to reduce environmental impacts and specific performance standards to ensure that the measures will achieve the intended reduction in impacts and thus do not meet the definition of deferred mitigation.

SIGNIFICANT AND UNAVOIDABLE IMPACTS

A number of commenters raised concerns regarding the number of significant and unavoidable impacts in the Draft EIR, stating these findings provide evidence that mitigation measures are inadequate.

Commenters also noted that language stating that measures should only be implemented "if feasible" is inadequate.

The Draft EIR discloses that implementation of Plan Bay Area 2050+ would result in 37 potentially significant impacts (see Table ES-1, Summary of Impacts and Mitigation Measures, in the Draft EIR Executive Summary). As required by State CEQA Guidelines 15126.4(a)(1) feasible mitigation was included for each of these impacts in the Draft EIR. Of the 37 impacts, 23 could not be determined to be reduced to less than significant with mitigation and are identified as significant and unavoidable. It was determined that 14 impacts could be reduced to a less-than-significant level with implementation of the mitigation included in the Draft EIR. However, 35 impacts were ultimately determined to be significant and unavoidable. In each resource section of the Draft EIR where significant impacts are found, the impact discussions explain the rational for each significance finding under the heading "Significance after Mitigation."

Ultimately, some impacts in the EIR are considered to be significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt mitigation measures included in the EIR, and thus cannot guarantee whether and how the mitigation measures will be implemented. It is ultimately the responsibility of a lead agency for future projects to determine and adopt mitigation measures. Even after the proposed plan is adopted by MTC and ABAG, the lead agencies for future projects retain the discretion to (1) carry out or approve projects that are not consistent with the plan, (2) exercise their discretion to deny approval of projects even if they are consistent with the plan, and (3) reach environmental conclusions and/or adopt mitigation measures that differ from those identified in this EIR. In short, the proposed plan, if adopted, would be advisory and not binding at the local level. For this reason, unless MTC and ABAG have regulatory or approval authority over a future project implemented pursuant to the proposed plan, MTC and ABAG cannot assume that all mitigation measures included in the EIR would be implemented or that impacts would be reduced to less than significant. However, lead agencies for specific projects under the proposed plan would be subject to requirements of CEQA, including State CEQA Guidelines Section 15126.4(a)(2), which states that "mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments."

Because, as described above, cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities implement projects under the plan, the analysis in this EIR does not evaluate project-specific impacts of individual projects. The EIR does, however, provide environmental analysis and mitigation that is intended to address the range of impacts that may be associated with individual projects. MTC and ABAG are not able to determine if mitigation measures would be feasible for all lead agencies and, thus, the language "if feasible" is included as part of the mitigation measures. This approach is consistent with statutory provisions governing streamlined environmental review under SB 375, as described above, and does not relieve local jurisdictions of the responsibility of determining whether project-specific impacts require additional CEQA analysis.

Ultimately, the analysis in the Draft EIR complies with MTC's and ABAG's obligation to disclose potential impacts and identify feasible mitigation measures if the plan is implemented through local agency approval of future projects consistent with the plan. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation, because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time. As permitted by the State CEQA Guidelines and reinforced by CEQA case law, the EIR discloses a menu of potential actions that could be applied at the project level to achieve stated performance standards. (See *East Oakland Stadium Alliance v. City of Oakland* (2023) 89 Cal.App.5th 1226, 1267-1268; *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 240-248.) However, for the reasons stated above, MTC acknowledges that application of such measures would be the responsibility of the lead agency conducting environmental review under CEQA, and the mitigation measures proposed to reduce the impacts of plan implementation will be

implemented only insofar as local jurisdictions determine their feasibility and approve them for projects under the plan.

FUNDING MECHANISMS

Several commenters also raised concerns related to funding mechanisms of the proposed plan and mitigation measures. Specifically, commenters state that the Draft EIR should identify funding for plan strategies and proposed mitigation, funding shortfalls, and requests to condition funding.

The purpose of CEQA is to disclose the environmental impacts of a project, not to determine the fiscal implications of the project and mitigation proposed. Economic feasibility may be considered by a lead agency when determining the feasibility of proposed mitigation or alternatives; however, fiscal impacts of a project are not environmental impacts under CEQA (CEQA Guidelines Section 15131). Financial feasibility of the project is a consideration for decision makers as part of the overall approval process but is not within the purview of CEQA.

Additionally, as described above, cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities implement local land use projects consistent with the plan, including implementation of any mitigation required to avoid or reduce the impacts of consistent projects. Unless MTC and ABAG have regulatory or approval authority over a future project implemented pursuant to the proposed plan, MTC and ABAG must rely on incentives or planning assistance in the form of planning grants and technical assistance to local jurisdictions in an effort to align local plans with the forecasted development pattern of the proposed plan.

Finally, the EIR is a program level document and because MTC and ABAG do not have land use authority over a future project implemented pursuant to the proposed plan, it would be speculative to determine the fiscal impacts associated with mitigation of the physical impacts analyzed in the EIR. Therefore, this EIR focuses on the physical impacts of implementing the proposed plan as a whole, as further described in Section 2.1.4, “Master Response 4: Program Level Document.”

2.1.3 Master Response 3: Plan Alternatives

Several comments are related to the range of alternatives provided in the Draft EIR and note that additional alternatives should be provided that reduce significant and unavoidable impacts. Additionally, a number of commenters raised concerns regarding the lack of differences between the alternatives.

CEQA REQUIREMENTS

CEQA requires EIRs to evaluate alternatives to the proposed project that could feasibly attain most of the basic project objectives and that would avoid or substantially lessen any of the significant environmental impacts. (CEQA Guidelines, Section 15126.6(a); see also Pub. Resources Code, Section 21001(g), 21002.) In recognition of the nearly endless range of potential project variations, an agency is not required to analyze every conceivable alternative, but is instead governed by the rule of reason. (CEQA Guidelines, § 15126.6(a).) An agency need only consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. (Ibid.) In addition, CEQA requires assessment of the likely foreseeable future condition if the proposed project were not implemented; this scenario is called the no project alternative. (Id., Section 15126.6(e).)

CEQA does not require an analysis of every alternative proposed by commenters. An agency need not analyze a proposed alternative that does not substantially differ from the proposed project or selected alternatives (see *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316,

355). Similarly, CEQA does not require analysis of a variation on an alternative studied in a draft EIR. (See *Marin Mun. Water Dist. v. Kg Land Cal. Corp.* (1991) 235 Cal.App.3d 1652, 1664-1666.) Ultimately, an EIR need "set forth only those alternatives necessary to permit a reasoned choice." (CEQA Guidelines, Section 15126.6(f).)

LEVEL OF GROWTH ASSUMED ACROSS ALTERNATIVES

The proposed plan and each of the alternatives are based on the regional growth forecast described in "Master Response 1: Regional Growth Forecast." That forecast is prepared in accordance with applicable federal and state requirements governing the RTP/SCS, as well as the Settlement Agreement with the BIA, described in Master Response 1 and "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement". Together, these requirements establish the framework for planning for projected population and employment growth and identifying areas sufficient to accommodate that growth across all income levels.

The alternatives to the proposed plan are designed to accommodate the same households and jobs projections, consistent with statutory requirements. The proposed plan alternatives, described in Draft EIR Chapter 4, "Alternatives to the Proposed Plan," are defined by their transportation, housing, economy, and environment strategies, which influence the respective forecasted development patterns, transportation investment, and sea level rise adaptation for each alternative.

An alternative that reduces household or job projections relative to the proposed plan to reduce significant and unavoidable impacts would not be consistent with requirements for the regional growth forecast. CEQA requires EIRs to only consider alternatives that are feasible. (14 Cal. Code Regs. Section 15126.6(a); 15126.6(f)(1). The term "feasible" is defined to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (14 Cal. Code Regs. Section 15364.) On this basis, MTC/ABAG may appropriately determine that an alternative is infeasible if it would conflict with applicable regulatory limitations and reject it from further consideration. (*Bay Area Citizens v. Association of Bay Area Governments* (2016) 248 Cal.App.4th 966, 1018-1019 [EIR for regional transportation plan not required to consider alternative that did not comply with the requirements of SB 375 or CARB].)

REASONABLE RANGE OF ALTERNATIVES

As explained above, the proposed plan is legally required to accommodate the forecasted growth in population, employment, households, and housing units. MTC/ABAG also applied this legal constraint to the alternatives to allow for an "apples-to-apples" comparison of the proposed plan and the alternatives and to provide a reasonable range of feasible alternatives that could accommodate the forecasted growth. Similarly, the proposed plan, and thus the plan alternatives, are constrained by the same forecast of reasonably available transportation, affordable housing, and environmental resilience revenues. In light of these constraints, it is reasonable to review a comparatively narrow range of alternatives. (See *Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 490-491.)

Additionally, "[a]n examination of an EIR's alternatives analysis must begin with the project's objectives, for it is these objectives that a proposed alternative must be designed to meet." (*Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.App.4th 184, 196-197.) As stated above, one of the plan's core objectives (as well as a legislative and legal mandate) is to house 100 percent of the region's projected growth across the full spectrum of income levels. To achieve the objectives, the alternatives reflect the proposed plan's core strategy of focused growth. Focusing growth, in part, helps to achieve the project objective and SB 375's mandate of meeting or exceeding a 19-percent reduction in per-capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels. The plan alternatives (other than

the No Project Alternative) achieve this objective, and further, they support public disclosure and informed decision making by studying whether different approaches that fit within the constraints discussed above, would achieve greater greenhouse gas (GHG) and vehicle miles traveled (VMT) reductions. Given the proposed plan's mandate under SB 375 to reduce GHG emissions through reduced VMT, consideration of such alternatives was critical. (*Cf. Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 546-550; *Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 435-437.)

Alternative 1 was selected to further reduce VMT, thereby reducing the region's GHG emissions. To further reduce VMT, Alternative 1 would remove regionally significant roadway expansion and extension projects, such as those that include general purpose freeway lanes, auxiliary lanes, express lanes, and high-occupancy vehicle lanes. This alternative would redirect development toward increased transit services across Bay Area transit operators to reduce automobile travel. While maintaining the proposed plan's land use framework, this alternative would position transit as the core of regional mobility.

Alternative 2 was selected to address challenges related to the region's expanded growth footprint. It does so by shifting development within Transit-Oriented Communities (TOC) Policy Areas, thus increasing development capacity in areas closer to major transit infrastructure. By focusing development in TOC Policy Areas this alternative targets efforts in areas most directly served by major transit infrastructure. This alternative would improve the effectiveness of existing and planned transit services, reduce reliance on automobile travel, and encourage more compact, walkable, and transit-supportive communities.

The Draft EIR generally assesses the impacts of the proposed plan and each alternative, via their respective land use growth, sea level rise adaptation projects, and transportation project footprints, relative to known resources, as well as the impacts of the combination of the forecasted development pattern and transportation projects on traffic, air quality, GHG emissions, and noise. The difference in impacts of the proposed plan and alternatives are anticipated to revolve around the location and size of land use growth as well as differences in transportation investment and other strategies as assessed in the Draft EIR. The proposed plan is composed of 35 integrated strategies across 4 elements. (Draft EIR, page 2-1.) Alternative 1 and Alternative 2 each modify four of those strategies. Alternative 1 modifies 4 transportation strategies (Draft EIR page 4-9) Alternative 2 modifies 4 housing and economic strategies, (Draft EIR page 4-10). These alterations result in various differences, both substantively and to the CEQA impacts, between the proposed plan and each of the two selected Alternatives.

The land use growth footprints are projected to be similar among the proposed plan and Alternative 1, while Alternative 2 would have a reduced land use growth footprint by concentrating growth in TOC Policy Areas (Draft EIR Table 4-7). In the absence of focused growth, the land use growth footprint of the No Project Alternative is significantly larger, overall and in terms of new developed land, than the proposed plan and the plan Alternatives. As a result, Alternative 2 has potential to reduce direct land use impacts related to the proposed plan. Draft EIR Tables 4-2 through 4-7 disclose the comparative differences of each alternative's forecasted development pattern in terms of total households, jobs, and the projected land use growth footprint projected by county.

The mix of transportation investments are similar across alternatives because the discretionary transportation dollars available for system investments are consistent across the alternatives; however, the mix of investments vary by mode and purpose (e.g., transit, highway, or bicycle/pedestrian, as well as maintain, modernize, or expand). Maintenance and modernization projects tend to be within the existing right of way of highway or transit corridors; therefore, those project types would have less construction related impacts relative to projects outside the existing right of way. For the same reason, extensions or expansions of highway or transit corridors would have more impacts relative to projects within the existing right of way. Therefore, the alternative's different mix of transportation investments have the potential to reduce or avoid impacts relative to the proposed plan. Draft EIR Table 4-10 discloses the comparative

differences of each alternative's transportation investments in terms of acreage of transportation projects footprint by county. Draft EIR Table 4-9 discloses the transportation system capacity across each alternative. The table reflects total highway (freeway + expressway) and roadway (arterial + collector) capacity across the proposed plan and alternatives. In terms of transit, Table 4-9 discloses the total seat miles of fixed guideways (rail + ferry) and bus services (local + express) across the proposed plan and alternatives.

When accounting for these differences in supply, the travel forecasting modeling analyses discloses the alternatives lead to variations in Bay Area travel behavior, including VMT, mode share, and other metrics disclosed in Draft EIR Table 4-31. Table 4-31 shows that the proposed plan, Alternative 1, and Alternative 2 would have similar VMT and transit passenger use, with Alternative 1 having the lowest VMT and the highest transit passenger use. The No Project Alternative would have the highest VMT and lowest transit passenger use (Draft EIR page 4-70 and 4-71).

Table 4-34 (Draft EIR page 4-77 to 4-83) shows a comparison of the impacts of the proposed plan and the alternatives. As the table shows, either of the two alternatives would affect, and generally be lesser than most of the proposed plan's significant and unavoidable impacts. This is consistent with the legislative policy that alternatives be evaluated that "substantially lessen [a Project's] significant effects." (Pub. Resources Code, Section 21002.)

Section 4.2, "Alternatives Considered but not Evaluated Further" includes a discussion of alternatives considered during scoping of the proposed plan, including suggestions from stakeholders. Alternatives considered but not evaluated further include a local context alternative; equity priority communities alternative; sea level rise alternative; and lower federal transportation funding alternative. Alternatives suggested as part of the Draft EIR public review period include a lower growth forecast alternative; remote work and artificial intelligence impact alternative; congestion reducing alternative; transit strategy alternative; telecommunication alternative; rural development alternative; vehicle miles traveled reducing alternative; seismic resilience alternative; hazard avoidance and environmental justice reducing alternative; and reduce wildfire alternative. These alternatives are outside the range of reasonable alternatives needed to fully evaluate the project because they either do not meet most of the basic project objectives, are infeasible, or would not avoid significant environmental impacts (State CEQA Guidelines Section 15126.6[c]). As described above, it is up to the discretion of MTC and ABAG to determine alternatives for evaluation in the EIR. The alternatives analysis in the Draft EIR provides three alternatives, including the required No Project Alternative, that meet the project objectives, are feasible, and reduce significant impacts.

The fundamental objective of the CEQA alternatives is to avoid or substantially lessen any of the significant environmental impacts of the proposed plan. The manner in which these impacts could be avoided or lessened were determined by variations in the location and size of land use growth among the alternatives as well as their differences in transportation investment and other strategies. The alternatives evaluated in Draft EIR Chapter 4, "Alternatives to the Proposed Plan," clearly demonstrate distinct approaches as to where to focus the region's forecasted growth and variations in the modal supply of the transportation system, representing a reasonable range of alternatives.

2.1.4 Master Response 4: Program Level Document

As described in Chapter 1, "Introduction," of the Draft EIR a program level EIR was prepared for the proposed plan pursuant to Section 15168 of the State CEQA Guidelines as an EIR addressing a series of actions that can be characterized as one large project and are related either:

(1) geographically,

(2) as logical parts in the chain of contemplated actions;

(3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or

(4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The Draft EIR presents a programmatic assessment of the potential impacts of the proposed plan, focusing on the entire set of projects, programs, and strategies contained in the proposed plan. Individual transportation, sea level rise adaptation, and development project impacts are not addressed in detail. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation, because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time.

Program EIRs are first-tier documents; that is, they are used to consider approval of an overall plan or other program. When subsequent projects are proposed consistent with the approved plan, they are evaluated to determine if the program EIR adequately addressed the impacts and mitigation measures associated with the subsequent project, and whether additional CEQA compliance is necessary. If a later activity would have effects that were not examined in the program EIR, and is not otherwise exempt from CEQA, a project-specific CEQA document must be prepared. The project-level CEQA documents may incorporate by reference general discussions from the broader EIR and focus on the impacts of the individual projects that implement the plan, program, or policy. Projects proposed subsequent to this program EIR would be required to either demonstrate that they have adopted the mitigation measures presented in the Draft EIR and have effectively reduced potential impacts or undergo additional CEQA review. If significant impacts associated with a specific project would result and such impacts are not addressed in the program EIR, additional CEQA review would be focused on these potential effects. Moreover, since MTC or ABAG cannot ensure that subsequent projects proposed under the proposed plan would commit to implement the mitigation measures in the EIR necessary to reduce impacts, the Draft EIR acknowledges this in its post-mitigation significance conclusions (i.e., concluding that feasible mitigation may not be sufficient) and discloses that potentially significant environmental impacts may be unavoidable, where appropriate. (See *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 865-867 [with respect to mitigation measures of uncertain effectiveness, a lead agency must identify and explain the uncertainty].) If a potentially significant environmental effect cannot be feasibly mitigated with certainty, the Draft EIR identifies it as potentially significant.

As discussed above in "Master Response 2: Mitigation Measures" addressing comments on mitigation measures included in the EIR, the CEQA statutes that authorize tiering for later transit priority projects consistent with the RTP/SCS specifically contemplate future environmental review incorporate "feasible" mitigation measures, as do the CEQA Guidelines for tiering from a program EIR. (See Public Resources Codes section 21155.2. (a) [A transit priority project that has incorporated all *feasible* mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to Section 21081, shall be eligible for [streamlined environmental review]"]; see also CEQA Guidelines section 15168, subdivision (c)(3) ["[a]n agency shall incorporate *feasible* mitigation measures and alternatives developed in the program EIR into later activities in the program."].)

2.1.5 Master Response 5: Building Industry Association of the Bay Area Settlement Agreement

Several commenters raised concerns regarding the Settlement Agreement entered into in 2014 with the California Building Industry Association (BIA) to resolve a legal challenge brought against the first Plan Bay Area, adopted in 2013. Multiple comments stated that the EIR does not explain how the settlement influences housing assumptions or how it may affect local infrastructure capacity, displacement, or affordability or the Regional Housing Needs Allocation process. Other commenters raised concerns that the Agreement was approved in closed session without its terms being presented to the public, allegedly in violation of the Brown Act. Some questioned whether requiring growth forecasts to assume no increase in in-commuters from outside the Bay Area imposes an unrealistic constraint that favors BIA, and whether the EIR should include an alternative without this assumption. Finally, commenters requested additional information about the second lawsuit challenging the first Plan Bay Area that was settled out of court. The following addresses each of these issues.

REQUIREMENTS OF BIA SETTLEMENT AGREEMENT

Several comments stated that, while the Draft EIR acknowledges ongoing obligations for MTC and ABAG under the Agreement, it does not include details about how the settlement influences housing assumptions, infrastructure capacity, displacement or affordability.

The Settlement Agreement specifies that its forward-looking obligations apply to the 2017 update to the SCS and thereafter to major updates, but not less frequently than eight-year intervals. Plan Bay Area 2050 constituted a major update within the meaning of the Settlement Agreement. By contrast, Plan Bay Area 2050+ is a minor update and does not represent a major update under the Agreement. Accordingly, certain procedural provisions of the Settlement Agreement are not triggered by this update.

The Settlement Agreement is a publicly available document that has been posted on the Plan Bay Area website since 2014. (See https://planbayarea.org/previous-plan/plan-bay-area-2013/legal-settlements.) Further, the obligations created by the Settlement Agreement are explicitly stated in Table 1-1 of the Draft EIR. The Agreement primarily establishes procedural requirements related to information-gathering and methodology disclosure, as well as public review regarding the assumptions used to prepare each applicable update to the SCS. The Agreement does not constrain the discretion of MTC and ABAG to adopt a particular forecast or development pattern, provided that the required procedures are followed.

In addition to the assumptions related to in-commuting contained in Paragraph 6a of the Agreement, discussed in more detail below, the Agreement requires monitoring of regional development patterns to help validate the assumptions made in prior SCS updates (paragraph 6b). It also requires that MTC and ABAG update the Feasibility Analysis prepared for Plan Bay Area (2013) to evaluate the type and distribution of housing units projected in each applicable updated SCS (paragraph 6c). The Feasibility Analysis considers local land use policies, market demand, financial feasibility, site related issues, financing, and infrastructure needs to assess whether areas identified for growth in prior plan cycles may feasibly develop.

The Agreement further requires disclosure and a public review process for key assumptions and descriptors used in preparing each applicable update of the SCS. Key assumptions include policies constraining or promoting particular types and intensities of real estate development in specific locations (e.g., zoning, urban boundaries, development fees and subsidies) and assumptions related to anticipated demand for specific housing types or modes of transportation. The Settlement Agreement does not prescribe any particular outcome related to these assumptions; rather, it requires a transparent public

process for development and disclosure of assumptions. Finally, the Settlement Agreement, as a non-prescriptive procedural agreement, does not in and of itself have a bearing on infrastructure needs.

SETTLEMENT AGREEMENT APPROVAL

The BIA Settlement Agreement was approved more than 10 years ago during a properly noticed closed session Commission meeting, and that approval was subsequently reported out in open session. As stated above, the Agreement is a publicly available document that has been posted to the Plan Bay Area website since its approval.

Importantly, nothing in the BIA Agreement or the other settlement agreement entered into related to the 2013 Plan Bay Area constitute or may be construed as an admission of any inadequacy or impropriety in connection with the approvals related to Plan Bay Area or certification of its EIR. Further, nothing in the Agreement constitutes or may be construed as superseding growth management policies or zoning regulations approved by local jurisdictions or voter initiative. Nor may the Agreement be interpreted as interfering with MTC and ABAG's full discretion and authority to make transportation funding decisions, including the metrics and inputs required to determine how transportation funding, programming, and allocation decisions are made.

ASSUMPTIONS RELATED TO IN-COMMUTE

Paragraph 6a of the Agreement requires that the SCS "set forth a forecasted development pattern for the region that includes the Regional Housing Control Total, which shall have no increase in in-commuters over the baseline year for the SCS, and shall not be based on historical housing production." The Agreement further provides that "the SCS will not use a 'ratio' theory, which assumes the same percentage of in-commuters as historic levels of in-commuting." The SCS "must demonstrate how all of the Regional Housing Control Total can be accommodated within the boundaries of the nine counties of the Bay Area." As further stated in the Agreement, neither MTC nor ABAG, nor individual local jurisdictions, have legal authority to prohibit employees who live outside the region from commuting to jobs within the region. The "intent of the Agreement is to ensure that the Regional Housing Control Total adopted as part of the SCS identifies housing opportunities with the region to those employees projected to work within the region during the course of the planning period."

These provisions related to consideration of in-commuting are consistent with the statutory requirement under Government Code section 65080 (b)(2)(B)(ii) that the proposed plan accommodate the forecasted growth within the region. While some level of in-commuting occurs and is expected to continue, the proposed plan is required to assume no increase in in-commuting over the plan horizon to facilitate planning that can accommodate projected regional growth. This requirement reflects both statutory planning direction and the procedural framework established in the Settlement Agreement.

The Agreement does not dictate that a particular number be used for the Regional Housing Control Total, nor does it dictate a particular development pattern outcome. Rather, the Agreement requires a public process for development of the methodology used to determine the Regional Housing Control Total and requires that the final total be determined and disclosed prior to issuance of an NOP for the SCS/RTP EIR. The requirements of the Agreement related to in-commuting, like the other requirements discussed above, are procedural and informational in nature; the Agreement is numerically non-prescriptive and does not require specific levels of housing projections. The public methodology highlights the core approach, tools, and intent of the forecast, while publication of the Regional Housing Control Total—along with population, households and jobs projections—provides the high-level direction and growth assumption for the proposed plan.

CBE SETTLEMENT AGREEMENT

As described in the Draft EIR, four lawsuits were filed challenging approval of the first Plan Bay Area and certification of its EIR in July 2013. Two of those lawsuits were fully litigated with final trial court judgements in favor of MTC and ABAG, affirmed by the court of appeal. The other two lawsuits were settled out of court, including the BIA Agreement and an agreement with the Sierra Club and Communities for a Better Environment (CBE Agreement).

While the BIA Agreement does not include a sunset clause (it applied to the 2017 SCS and thereafter to all major updates, but not less frequently than at each eight-year interval after 2017), the CBE Agreement included provisions for additional study and disclosures that applied only to Plan Bay Area 2040, adopted in 2017.

As reflected in the 2017 Draft EIR, the terms of that agreement required additional study of greenhouse gas emissions, a summary of express lane conversion projects that were being studied at the time of the CBE Agreement and a disclosure of financing related to those projects, validation of assumptions related to PDA performance through an update to the Feasibility Report, an analysis of freight movement, and coordination with the Bay Area Air Quality Management District on healthy infill guidelines that BAAQMD was preparing at the time the Agreement was entered into. The 2017 Draft EIR includes detailed discussion related to compliance with the terms of the CBE Agreement.

2.1.6 Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources

Multiple commenters raised concerns that the Draft Plan Bay Area 2050+ (proposed plan) and Draft EIR rely on significant future funding sources that have not been secured. Commenters stated that the proposed plan depends on aspirational or speculative regional, state, and federal revenues—including potential future regional revenue measures—and may create funding risks or implementation uncertainty for local agencies, transit operators, and special districts. Several commenters requested that MTC and ABAG more explicitly disclose funding risk and fiscal uncertainty, consider fallback scenarios, and/or scale, phase, prioritize, or revise proposed plan strategies based on realistic fiscal constraints. Commenters also noted uncertainty regarding future federal transportation funding and questioned whether the proposed plan's long-range investment assumptions are realistic in the current economic environment.

While comments on funding risks, fiscal uncertainty, and reliance on future revenue sources were not raised in relation to environmental issues and do not relate to the accuracy or completeness of the environmental document, MTC and ABAG address these issues in the following response in the interest of transparency.

ROLE OF THE PROPOSED PLAN

Commenters expressed concern regarding fiscal uncertainty, reliance on future revenues, and the long-range feasibility of implementing the proposed plan's strategies.

Plan Bay Area 2050+ is a long-range regional policy and planning document prepared every four years as part of the statutorily required RTP/SCS. The proposed plan establishes a vision and strategic framework for transportation, housing, the economy, and the environment across the planning horizon. The proposed plan is not a financing plan, does not impose taxes, does not approve ballot measures, and does not allocate funding responsibility to local governments, special districts, or residents. Identification of

potential investments and funding concepts in the proposed plan is intended to support long-range planning and regional coordination, not to create binding fiscal obligations.

Implementation of plan strategies would occur over time through subsequent actions by federal, state, regional, and local agencies, as well as future legislative and/or voter actions where applicable. The proposed plan does not commit the MTC or ABAG, local jurisdictions, or other implementing entities to specific expenditures.

The proposed plan also recognizes that some strategies identified in the plan may not be implemented, may be implemented at a reduced scale, or may be implemented on a longer timeframe if anticipated funding sources are not realized. Accordingly, the plan's discussion of investment needs and funding pathways is best understood as describing a range of implementation concepts rather than a guaranteed delivery schedule.

TRANSPORTATION INVESTMENTS AND FEDERAL FISCAL CONSTRAINT REQUIREMENTS

Commenters expressed concern that long-range transportation investments assume uncertain future revenues, particularly given volatility in federal funding programs and changing economic conditions. The transportation element of Plan Bay Area 2050+ is subject to federal fiscal constraint requirements. This means the RTP/SCS must demonstrate that planned transportation investments can be supported by reasonably anticipated revenues over the plan horizon. These requirements establish a formal structure for long-range transportation financial planning, including technical assumptions about revenues and expenditures consistent with applicable guidance.

The proposed plan recognizes that uncertainty remains inherent in long-range planning, including uncertainty related to future appropriations, discretionary grants, inflationary pressures, and potential new revenue measures. Even where revenues are reasonably anticipated based on precedent and planning practice, the timing and magnitude of future funding levels—including at the federal level—remain uncertain over the multi-decade horizon of the proposed plan. The plan's discussion of such sources is intended to describe plausible implementation pathways; it does not represent a guarantee that any particular funding source will be realized at a specific magnitude or within a certain timeframe.

NON-TRANSPORTATION STRATEGIES AND PLANNING-LEVEL INVESTMENT NEEDS

For non-transportation elements—such as housing-related strategies, climate resilience, and sea level rise adaptation—the proposed plan identifies planning-level investment needs intended to illustrate the scale of action that could be required to achieve regional goals over the planning period. For these elements, the proposed plan describes potential strategies and corresponding orders of magnitude for investment. These estimates are intended to support regional policy discussions and interagency coordination; they do not constitute adopted capital programs, funding commitments, or guaranteed implementation.

Accordingly, investment totals presented for certain strategy areas may reflect a combination of (1) existing or ongoing funding sources, (2) potential future funding that may become available through new or expanded programs, and (3) aspirational funding concepts that would require additional development and approvals. Identification of these concepts is intended to provide transparency regarding the scale of long-term need and potential tools that may be pursued over time, rather than to assert that funding is currently secured.

In addition, commenters expressed concern that planning-level investment estimates may imply immediate, universal, or simultaneous implementation of strategies. The proposed plan does not assume that all strategy elements will be implemented at once or at full scale. Rather, implementation would be

expected to occur over time, through phased programming and incremental adoption based on evolving conditions and funding availability.

FUTURE REVENUE SOURCES ARE NOT SECURED AND WOULD REQUIRE SEPARATE ACTIONS

Several commenters correctly note that some potential funding sources discussed in the proposed plan—such as future regional measures, new state or federal programs, or future discretionary appropriations—are not currently secured and would require separate future decisions and approvals. For example, any future regional revenue measure would require separate public processes and voter approval and is outside the scope of actions approved through adoption of Plan Bay Area 2050+. Similarly, discretionary state and federal grants are subject to program requirements, competitiveness, eligibility, and award decisions outside of the MTC and ABAG's control.

Long-range regional planning necessarily includes consideration of potential future funding sources to describe how strategies could be implemented. However, the proposed plan's identification of these sources should not be interpreted as a commitment that such revenues will occur, nor that they will be available at any particular magnitude or in any particular year.

Many of the implementation pathways described in the proposed plan—including those that rely on new revenue tools or expanded discretionary programs—are contingent on future actions beyond adoption of this proposed plan.

FISCAL RISK, LOCAL AGENCY OBLIGATIONS, AND IMPLEMENTATION DISCRETION

Several commenters expressed concerns that long-range strategies could create future funding burdens or unfunded obligations for local agencies, service providers, and special districts. The proposed plan does not require local agencies or special districts to undertake specific capital projects, expand public services, or commit local funds. Local jurisdictions and service providers retain discretion over land use approvals, development timing, capital improvement programming, rate-setting, and other budgetary decisions within their authority.

In addition, commenters noted that long-range capital investments often carry associated operations and maintenance costs. The proposed plan does not allocate responsibility for such costs and does not require local agencies to assume ongoing operating obligations; such considerations would be evaluated through future agency budget decisions and project/program implementation processes.

PHASING, PRIORITIZATION, AND ADAPTIVE IMPLEMENTATION

MTC and ABAG appreciate commenters' recommendations to more explicitly evaluate prioritization and phasing in light of fiscal uncertainty. The proposed plan's implementation framework is intended to be iterative and adaptable over time, recognizing that strategies may be implemented incrementally and through multiple funding and programming cycles. Implementation would occur through established processes that consider funding availability, statutory requirements, readiness, performance outcomes, and emerging regional needs. Accordingly, proposed plan strategies may be prioritized, phased, scaled, modified, or deferred based on fiscal constraints, implementation progress, program performance, and changing regional conditions.

Because Plan Bay Area is updated every four years, assumptions related to available funding sources, implementation feasibility, economic conditions, and program effectiveness are regularly revisited and adjusted. This recurring update cycle provides a mechanism to refine strategies, revisit investment assumptions, and adjust implementation pathways in response to changing fiscal conditions and policy direction.

Finally, MTC and ABAG acknowledge commenters' concerns regarding elevated uncertainty in federal transportation funding and broader economic conditions. The proposed plan is designed as a long-range framework that can be adjusted over time as funding conditions evolve, including through reassessment of revenue assumptions, project sequencing, and strategy prioritization in future plan updates.

2.1.7 Master Response 7: Regional Coordination, Partnerships, and Local Implementation

Numerous commenters encouraged continued and strengthened regional partnership to support local implementation of Plan Bay Area 2050+ (proposed plan). Commenters emphasized the importance of coordination among regional and local agencies to achieve plan objectives and requested that implementation programs and funding strategies be aligned more directly with local planning priorities. Several commenters also questioned MTC and ABAG's authority over local land use decisions and sought clarification regarding how implementation would occur given the differing roles of MTC, ABAG, local jurisdictions, and other implementing agencies. In many cases, these comments express policy preferences or implementation questions rather than raising environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The following addresses these issues related to interagency coordination, partnership, and local implementation of the proposed plan.

ROLE AND AUTHORITY

The roles and authorities of MTC and ABAG are described in Section 1.7.2, "Regional Planning Agencies," of the Draft EIR. MTC was formed in 1970 and functions under State and federal law as the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area. MTC is the federally designated metropolitan planning organization (MPO) and the State-designated regional transportation planning agency for the Bay Area, and is responsible for preparing and updating the Regional Transportation Plan (RTP) every four years.

ABAG was formed in 1961 by a joint powers agreement among Bay Area local governments and serves as the comprehensive regional planning agency and Council of Governments for the nine counties and 101 cities and towns of the San Francisco Bay region. ABAG is a public entity created by local governments to meet their planning and research needs related to land use, and is responsible under State law for conducting the RHNA process. ABAG also hosts several joint powers and administrative entities related to environmental and water resource protection, disaster resilience, energy efficiency, hazardous waste mitigation, financial services, and staff training for local counties, cities, and towns.

LOCAL LAND USE CONTROL AND SB 375

A number of commenters questioned MTC and ABAG's authority over local land use decisions. SB 375 was adopted, in part, to "encourage developers to submit applications and local governments to make land use decisions that will help the state achieve its climate goals under AB 32, assist in the achievement of state and federal air quality standards, and increase petroleum conservation" (SB 375, Stats. 2008, ch. 728, Section 1(f) [uncodified legislative findings]). SB 375 establishes regional planning requirements intended to support development patterns that advance statewide greenhouse gas emissions reduction goals.

It is important to note, however, that neither the proposed plan nor the Draft EIR limit in any way the land use authority of any city or county (Government Code Section 65080(b)(2)(K)). In other words, even after the proposed plan is adopted by MTC and ABAG, lead agencies for future land use development projects retain the discretion to (1) carry out or approve projects that are not consistent with the proposed plan, (2) exercise their discretion to deny approval of projects even if they are consistent with the proposed plan,

and (3) reach environmental conclusions that differ from those identified in this EIR. In short, the proposed plan, if adopted, would be advisory and not binding at the local level.

Cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities continue to build out in the future. Cities and counties are not required to revise their "land use policies and regulations, including [their] general plan, to be consistent with the regional transportation plan or an alternative planning strategy" (Government Code Section 65080(b)(2)(K)). The proposed plan provides a transportation and land use vision that, "if implemented, [would] achieve the GHG emissions reduction targets" for the region (Public Resources Code Section 21155(a) (emphasis added)). The land use portion of the proposed plan will be implemented only insofar as local jurisdictions act upon the proposed plan's policies and recommendations.

Because local jurisdictions retain land use authority, MTC and ABAG rely on incentives and planning assistance—including planning grants, technical assistance, and collaborative planning efforts—to support local actions that align with the proposed plan's development pattern and strategy framework.

IMPORTANCE OF ONGOING COORDINATION AND REGIONAL PARTNERSHIP

MTC and ABAG recognize that achieving the proposed plan's objectives requires sustained coordination across agencies and geographies. Local circumstances vary widely across the Bay Area, including differences in transit access and service levels, existing development patterns, infrastructure capacity, local policy priorities, and climate vulnerability. For this reason, implementation depends on continued collaboration with local governments, county transportation agencies (CTAs), transit operators, special districts, and community stakeholders, consistent with applicable statutory requirements, adopted program guidelines, and available resources.

MTC and ABAG appreciate commenters' recommendations to strengthen regional partnership and will continue to coordinate with implementing agencies and stakeholders to support local implementation outcomes.

IMPLEMENTATION TOOLS: FUNDING PROGRAMS, TECHNICAL ASSISTANCE, AND COLLABORATIVE PLANNING

Implementation of Plan Bay Area 2050+ strategies is supported through a combination of regional transportation funding programs, discretionary grant programs, technical assistance, and coordinated regional planning efforts. For example, MTC has historically used transportation funding programs and planning grants to support local planning, multimodal investments, and related implementation activities that advance regional goals. MTC and ABAG also provide technical assistance to local jurisdictions through implementation-focused programs, including housing-related and equity-related support, where applicable.

The specific selection of projects and investment priorities is determined through subsequent programming decisions, individual agency actions, and adopted funding program requirements, including eligibility criteria and evaluation processes. The proposed plan provides a strategic framework to inform those future actions but does not itself approve or fund specific projects.

ALIGNMENT WITH LOCAL PRIORITIES AND OTHER IMPLEMENTATION FRAMEWORKS

Several commenters requested that regional implementation programs be aligned more directly with local planning priorities and related frameworks, including local transportation plans, Housing Element opportunity sites, community-based transportation plans, resilience planning efforts, equity frameworks, and local economic development initiatives. MTC and ABAG recognize the importance of aligning regional

strategies and implementation tools with local implementation needs, including in communities that may not align neatly with a single regional program geography or policy framework. These recommendations are noted and will be considered through future plan refinements, funding program updates, and implementation actions.

ADAPTIVE AND ITERATIVE IMPLEMENTATION

Because Plan Bay Area is updated on a regular four-year cycle, assumptions, strategies, geographies, and implementation approaches are revisited and refined over time based on evolving local and regional conditions, statutory requirements, funding availability, implementation experience, and stakeholder input.

2.1.8 Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities

Numerous commenters requested revisions to Plan Bay Area 2050+ (proposed plan) strategies, including modifications to project lists, implementation programs, policy emphases, and prioritization among investments. Some comments requested the addition, removal, acceleration, deferral, or reprioritization of specific strategies or proposed investments, and others questioned whether proposed plan assumptions and strategy selections reflect the most appropriate regional priorities. In many cases, these comments express policy preferences or implementation recommendations rather than raising environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. However, the following information is provided to clarify how Plan Bay Area strategies are developed, how implementation priorities are determined, and how future revisions to plan strategies and project lists may occur.

ROLE OF PLAN BAY AREA 2050+

Plan Bay Area 2050+ is a long-range regional policy and planning document prepared every four years as part of the statutorily required RTP/SCS. The proposed plan provides a long-range vision and strategy framework to guide transportation, housing, economic, and environmental outcomes in the Bay Area over the planning horizon.

The proposed plan includes multiple elements and strategy areas. Some elements include specific projects or investment programs, while others identify broader policy approaches, planning concepts, or long-term investment needs. Implementation of plan strategies is expected to occur over time through subsequent decisions and actions by federal, state, regional, and local agencies, consistent with available funding, adopted program guidelines, statutory requirements, and local discretion.

PLAN STRATEGIES AND IMPLEMENTATION PROGRAMS

Commenters requested revisions not only to transportation projects but also to other plan strategies (e.g., housing, climate resilience, and equity-related strategies). MTC and ABAG acknowledge that many plan strategies are intended to serve as a regional framework for coordination and action across diverse implementing agencies and geographies. While Plan Bay Area 2050+ identifies desired outcomes and implementation directions, it does not approve or fund every action described in the plan, nor does it allocate responsibility to any single entity for regional outcomes that require shared implementation.

For non-transportation elements, Plan Bay Area 2050+ often takes a planning-based “what would it take” approach that identifies the scale and type of investments, coordination, and policy actions that could be

required to meet long-term regional goals. These strategy descriptions and planning-level investment estimates are intended to inform regional policy discussions and improve alignment across agencies, rather than to function as project-level commitments or adopted capital programs.

TRANSPORTATION ELEMENT: THE TRANSPORTATION PROJECT LIST

Several comments requested revisions to the Plan Bay Area transportation project list, including changes to specific project inclusions, timing assumptions, or prioritization. The Transportation Project List is a component of the federally mandated RTP and identifies investments in the operations, maintenance, expansion, and optimization of the region's transportation system, including highways, bridges, local streets, transit services and facilities, and active transportation infrastructure, nested under the plan's transportation strategies.

Federal guidelines require the transportation element of the RTP to be fiscally constrained, meaning that planned investments may not exceed reasonably expected revenues over the planning horizon. As a result, selection and sequencing of transportation investments requires technical analysis, sponsor coordination, and policy-level tradeoffs.

Developing the Transportation Project List is a multi-year process that includes evaluation of investment needs and project concepts, review of sponsor priorities, and public and interagency coordination. Major investments require additional assessment to support informed decision-making regarding their performance, benefits, and tradeoffs, consistent with federal performance-based planning requirements.

PLAN REFINEMENT, UPDATES, AND AMENDMENTS

Some comments requested that MTC and ABAG revise plan strategies or project lists to reflect new priorities, emerging conditions, or differing local and stakeholder perspectives. MTC and ABAG acknowledge the value of these recommendations and note that Plan Bay Area is designed to be updated and refined over time.

Following plan adoption, transportation projects may be added, revised, moved between time periods, or adjusted in cost through established administrative modification or amendment processes, subject to applicable requirements. Continued fiscal constraint must be maintained, meaning that adding projects or increasing costs generally requires corresponding adjustments elsewhere within the fiscally constrained transportation program. In addition, the revised plan must remain consistent with applicable statutory requirements, including SB 375 greenhouse gas emission reductions targets and federal planning requirements. Any such revisions would also be evaluated for compliance with CEQA, as applicable.

More broadly, because Plan Bay Area is updated on a four-year cycle, plan strategies, assumptions, implementation tools, and geographies are revisited and refined in response to evolving policy requirements, economic conditions, funding availability, implementation experience, and stakeholder input. MTC and ABAG appreciate commenters' input regarding plan strategies and implementation priorities, and these recommendations will be considered through future plan updates, program refinements, and ongoing regional coordination efforts.

2.1.9 Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+

Several commenters requested clarification regarding the Transit-Oriented Communities (TOC) Policy and its relationship to Plan Bay Area 2050+ (proposed plan) and the Draft EIR. Comments raised concerns about TOC implementation timing, potential funding eligibility implications, and whether the Draft EIR's alternatives analysis could create new or premature obligations for local jurisdictions.

The TOC Policy was adopted by the MTC Commission in September 2022 (Resolution 4530) to help implement Plan Bay Area 2050. The policy established standards and expectations for development in transit station areas and directed staff to incorporate TOC-related incentives into future regional funding programs, including subsequent cycles of the One Bay Area Grant (OBAG) program.

The TOC Policy is separate from Plan Bay Area 2050+. The proposed plan does not newly adopt or modify the TOC Policy, nor does it mandate TOC compliance as a land use requirement. Local land use authority remains with individual jurisdictions. Implementation of the TOC Policy occurs through separate Commission actions related to regional funding programs. Consistent with that framework, the Commission has continued refining TOC implementation through OBAG 4. On February 25, 2026, the Commission adopted a TOC Incentive Program as part of OBAG 4, establishing a fully incentive-based approach that preserves jurisdictions' eligibility for general OBAG funding while providing additional funding opportunities for jurisdictions demonstrating substantial TOC progress. Implementation details and evaluation criteria are addressed through separate Commission actions and administrative guidance.

With respect to the Draft EIR alternatives analysis, commenters questioned whether evaluation of the TOC Growth Focus Alternative implies a binding implementation requirement or presumes final adoption of TOC implementation materials. The Draft EIR's analysis of this alternative does not establish a final or binding implementation program, nor does it require local jurisdictions to take specific actions prior to any future Commission adoption of funding-related procedures. Rather, the TOC framework is used as a planning-level analytical tool to evaluate a plausible regional growth pattern that emphasizes transit-supportive development. This provides a consistent basis for comparing the environmental performance of different growth and transportation patterns and fulfills CEQA's requirement to evaluate a reasonable range of alternatives.

While the TOC Growth Focus Alternative was analyzed in the Draft EIR and represents a feasible alternative to the proposed plan that MTC Commissioners and the ABAG Executive Board could consider for adoption, MTC and ABAG staff are not recommending this alternative for adoption.

2.2 COMMENTS AND RESPONSES

2.2.1 Agencies

Letter A1 Napa County

Brian Bordona, Director of Planning, Building & Environmental Services
December 8, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A1-1

Dear Plan Bay Area 2050+ Team,

Thank you for your hard work and dedication on the Plan Bay Area 2050 project. Your thoughtful engagement throughout this effort—and your continued acknowledgment and support of Napa County's longstanding agricultural preservation policies—are deeply appreciated.

Response A1-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A1-2

We also value your recognition that agricultural preservation is not only central to our community identity but also serves as the economic backbone of Napa County. Protecting these lands while concentrating urban development within our cities has allowed us to maintain a balanced, sustainable approach to growth that supports both our economy and quality of life.

Thank you again for your leadership, collaboration, and the considerable effort you invested in this project. Your work will have lasting, positive impacts for the region and for Napa County.

Response A1-2

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A2 City of Pacifica

Kevin Woodhouse, City Manager
December 9, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A2-1

Dear Ms. Bouchie:

On behalf of the City of Pacifica, thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for **Plan Bay Area 2050+**. Pacifica appreciates the region's continued efforts to plan

for a resilient future and recognizes the considerable work undertaken by MTC/ABAG to address climate adaptation, transportation, housing, and environmental challenges.

Response A2-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A2-2

Sea Level Rise as a Critical Issue for Pacifica

Pacifica is one of the Bay Area communities most directly and immediately affected by coastal erosion and sea level rise. Our city faces ongoing threats to public infrastructure, utilities, transportation corridors, recreation assets, neighborhoods, and coastal ecosystems. Addressing sea level rise is not simply a long-term planning exercise for Pacifica— it is an urgent public safety and infrastructure protection imperative.

Response A2-2

The proposed plan includes sea level rise adaptation projects, the impacts of which are analyzed throughout the Draft EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A2-3

Support for Environmental Strategy EN1 and Project 61301

The City strongly supports **Environmental Strategy EN1: Adapt to Sea Level Rise**, which prioritizes actions to protect shoreline communities by preparing a regional resilience project list. Pacifica appreciates that the **Final Resilience Project List** includes **Project 61301: "Pacifica Sea-Level Rise Adaptation Plan Adaptation Options."** This project—encompassing seawalls, sediment management, and related coastal adaptation measures—is essential for both Pacifica and the Bay Area region's ability to respond effectively to accelerating sea level rise.

Response A2-3

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A2-4

Ongoing Refinement of Project 61301

While Pacifica supports the inclusion of Project 61301 in the DEIR, the City wishes to note that it has continued planning, engineering, and design work to refine the scope and implementation pathway for this important regional resilience project. As part of this refinement process, the City is advancing three key subprojects that fall directly within the scope of Project 61301:

1. **Beach Boulevard Infrastructure Resiliency Project** – The project is to replace the current seawall and outdated infrastructure while building climate resilience into one of the most vulnerable segments of the City's shoreline.

2. **Pacifica Pier Rehabilitation Project** – The project aims to restore and extend the service life of the aging municipal fishing pier through prioritized structural repairs, including spall and crack

remediation, pile reinforcement, and handrail replacement, following significant storm damage and ongoing deterioration.

3. **310-330 Esplanade Infrastructure Preservation Project** – a coastal stabilization effort designed to protect public infrastructure and mitigate severe bluff erosion through the construction of a shotcrete wall with tieback anchors, subsurface sheet pile scour protection, and bluff-top restoration using native vegetation.1

Response A2-4

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A2-5

Request for Clarification in the Final EIR

To ensure accuracy and to support future coordination and funding efforts, the City respectfully requests that **both of these subprojects be specifically referenced by name** in the Final EIR as components of **Project 61301**, while maintaining the overall project description and scope as analyzed in the DEIR. This clarification will help align the EIR with the City's active planning work and will further strengthen the regional framework for coordinated sea level rise adaptation. For reference, please see the project information included in **Attachments 1 and 2** to this letter.

Response A2-5

Please refer to "Master Response 4: Program Level Document" regarding future projects and their project-specific details under the proposed plan. The Draft EIR uses a programmatic approach to analyze impacts for the entire set of strategies contained in the plan. It does not specifically address individual project-level impacts but provides a broad framework to guide regional strategies (Draft EIR, Section 1.4.2). Local jurisdictions maintain the responsibility for determining whether project-specific impacts require additional CEQA analysis (Draft EIR, Section 1.8). Individual transportation, sea level rise adaptation, and development project impacts, such as the projects included in this comment, are not addressed in detail. Rather, the EIR provides environmental analysis and mitigation that is intended to address the range of impacts that may be associated with individual projects. If a future project or subproject is within the scope of the analysis of this EIR, the commenter may use the Draft EIR for future CEQA streamlining of these projects as described in Section 1.9, "CEQA Streamlining Opportunities" of the Draft EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A2-6

Conclusion

Pacifica appreciates the inclusion of critical coastal resilience investments in Plan Bay Area 2050+ and values the collaborative regional approach embodied in Environmental Strategy EN1. We look forward to continued partnership with MTC/ABAG and regional stakeholders as we work together to safeguard our communities from the accelerating impacts of climate change.

Thank you for considering the City's comments. Please feel free to contact me should you have any questions or require additional information (kwoodhouse@pacifica.gov, 650-738-7409).

Attachments:

1. Beach Boulevard Infrastructure Resiliency Project
2. Pacifica Municipal Fishing Pier 2023 Condition Assessment Report
3. 310-330 Esplanade Infrastructure Preservation Project

Response A2-6

These conclusionary remarks, as well as the three attachments, are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A3 City of Mill Valley

Max Perrey, Mayor
December 10, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A3-1

Dear MTC and ABAG Board Members: The City Council of Mill Valley appreciates the opportunity to comment on the Draft Plan Bay Area 2050+ and its accompanying Draft Environmental Impact Report (Draft EIR). As local elected officials responsible for public safety, fiscal stewardship, infrastructure planning, and environmental protection, we have substantial concerns that the Draft Plan relies on an overstated population and employment forecast, and that the Draft EIR does not adequately analyze or mitigate the resulting environmental, public safety, and infrastructure impacts.

Response A3-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to Responses A3-2 through A3-18 below for comments regarding population and employment forecasts and the Draft EIRs adequacy to analyze or mitigate impacts.

Comment A3-2

Specifically, our concerns center on:

1. The Draft Plan's inflated and non-standard regional growth forecast, which diverges sharply from the State's official projections and does not account for potential reductions in jobs due to the impact of Artificial Intelligence (AI) and increased out-migration driven by demonstrated trends in remote or gig work; and

Response A3-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment A3-3

2. The Draft EIR's reliance on mitigation measures that are voluntary, deferred, nonenforceable, and dependent on optimistic assumptions about infrastructure expansion— resulting in numerous impacts remaining Significant and Unavoidable (SU).

Response A3-3

Please refer to "Master Response 2: Mitigation Measures" regarding the enforceability of mitigation measures and MTC and ABAG's land use authority. Impacts in the EIR are generally considered to be significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt mitigation measures included in the EIR. It is ultimately the responsibility of a lead agency for future projects to determine and adopt mitigation. Mitigation measures in the EIR include specific performance standards for lead agencies of future projects under the plan to implement and meet all requirements for mitigation measures pursuant to CEQA Guidelines Section 15126.4.

Comment A3-4

3. The Draft Plan's and Draft EIR's dependence on major future regional, state, and federal funding streams that have not been secured, creating substantial funding risks and unfunded local obligations for the infrastructure, public services, and hazard-mitigation measures required to support the Plan's growth assumptions.

Response A3-4

With respect to implementation feasibility and funding uncertainty, please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," which addresses the planning-level nature of the plan's investment estimates, reliance on future actions by multiple agencies and governing bodies, and uncertainty associated with potential future state, federal, and regional funding sources.

Please refer to "Master Response 2: Mitigation Measures" related to funding mechanisms of the proposed plan and mitigation measures. Cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities implement local land use projects under the plan, including any mitigation required to avoid or reduce the impacts of implementing said projects. Additionally, although economic impacts may be considered in a CEQA document identification of funding streams for mitigation is not a requirement of CEQA and need not be considered in the EIR (State CEQA Guidelines Section 15131).

Comment A3-5

Throughout the Draft EIR, mitigation is deferred to voluntary actions by local jurisdictions, relies on non-binding guidance ("where feasible"), presumes infrastructure expansion under optimistic conditions, and lacks measurable performance standards. As a result, the Draft EIR itself acknowledges that many impacts remain Significant and Unavoidable (SU) unless every jurisdiction independently implements the recommended measures—an approach that does not meet the feasibility or enforceability requirements of the California Environmental Quality Act (CEQA).

Response A3-5

Please refer to "Master Response 2: Mitigation Measures" regarding mitigation measures included in the Draft EIR and MTC and ABAG's land use authority over future projects under the plan. The analysis in the Draft EIR complies with MTC and ABAG's obligation to disclose potential impacts and identify feasible mitigation measures. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation, because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time. The EIR discloses a menu of potential mitigation measures that could be applied at the project-level to meet identified performance standards; however, for the reasons stated in Master Response 2, MTC acknowledges that application of such measures would be the responsibility of the project-level lead agency conducting environmental review under CEQA. As a result, there is inherent uncertainty in the degree of mitigation that would ultimately be implemented to reduce potentially

significant impacts identified in the Draft EIR. Consequently, the Draft EIR acknowledges this in its post-mitigation significance conclusions (i.e., concluding that feasible mitigation may not be sufficient) and discloses that potentially significant environmental impacts may be unavoidable, where appropriate.

Comment A3-6

Our concerns fall into six primary categories:

1. The Growth Forecast Is Overstated and Uses a Non-Standard Modeling Approach

The Draft Plan's demographic assumptions significantly exceed State forecasts:

- The Draft Plan projects 9.6 million residents in 2050, an increase of +1.84 million people — nearly four times the California Department of Finance (DOF) projected increase of approximately +0.49 million.
- In percentage terms, the Draft Plan assumes a 24% regional population growth rate, compared to the DOF's much lower 6.5% projection.

In addition to overstating regional growth, the Draft Plan's assumptions are out of alignment with statewide demographic trends. According to the DOF/Demographic Research Unit (DRU):

- California as a whole is projected to grow by only about +1.0 million residents through 2050.
- Under the Draft Plan, the Bay Area alone would account for +1.84 million residents—nearly double the State of California's total expected population increase.

These inconsistencies raise serious concerns about the plausibility of the Draft Plan's regional assumptions.

The Plan uses a policy-driven economic model (REMI) in which population is derived from assumed job levels rather than demographic fundamentals. This approach does not incorporate major structural shifts in the Bay Area economy, including:

- Sustained out-migration driven by remote work and the gig economy, reducing long-term residential demand.
- Office vacancy rates signal reduced demand for commercial space and slower office-based employment growth.
- Workforce reductions from AI-driven automation in key white-collar sectors, lowering future job and population growth.

Because the growth forecast drives Regional Housing Needs Allocation (RHNA) requirements, CEQA baselines, transportation modeling, and infrastructure planning, reliance on an inflated forecast risks significant regional planning misalignment.

Inflated forecasts also create a risk of "paper demand": developers will not build units for which no real market exists, yet cities may still be penalized under State housing laws for failing to meet housing production targets that are based on unrealistic population projections.

Response A3-6

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth methodology and its relationship to the separate RHND/RHNA process. Regarding the impact of office vacancy rates on employment growth forecasts, regional employment forecasts typically do not

directly consider micro real estate market indicators such as commercial vacancy rates. Organizations such as the Bureau of Labor Statistics (BLS) and state labor market offices typically follow a structured forecasting process, accounting for factors including macroeconomic output growth, labor productivity, labor force (driven by population and labor participation), and industry shifts. REMI's methodology is aligned with standard economic and employment forecast methods.

Comment A3-7

2. Wildfire, Emergency Evacuation, and Public Safety Impacts Are Significant and Unavoidable (SU) The Draft EIR identifies several impacts as Significant and Unavoidable (SU):

    - Impact HAZ-7 — Significant and Unavoidable (SU): Wildfire exposure, pollutant release, and post-fire geohazards in and near Fire Hazard Severity Zones (FHSZs).

    - Impact HAZ-6 — Significant and Unavoidable (SU): Increased population and congestion impair emergency response and evacuation performance.

    - Impact CUM-8 — Significant and Unavoidable (SU): Cumulative wildfire and evacuation impacts.

Although the Draft Plan excludes certain Wildland–Urban Interface (WUI) areas from Priority Development Areas (PDAs), the Draft EIR notes that development may still occur near high-risk locations, infrastructure will continue passing through fire-prone areas, and congestion will constrain evacuation capacity. Mitigation measures for HAZ7, HAZ-8, and CUM-8 are discretionary, rely on voluntary implementation by local jurisdictions, and use "where feasible" language; therefore, wildfire and evacuation impacts remain Significant and Unavoidable (SU).

Response A3-7

The comment summarizes the impact conclusions related to emergency evacuation and wildfire as discussed in the Draft EIR pages 3.9-41 through 3.9-5, 5-16, and 5-17. The mitigation measures for evacuation and wildfire Impacts HAZ-6, HAZ-7, and CUM-8 are presented on pages 3.9-45 and 3.9-51 of the Draft EIR. Please refer to "Master Response 2: Mitigation Measures" for a discussion of significant and unavoidable impact findings. As discussed therein measures included in these sections of the Draft EIR would be implemented, as applicable, by implementing agencies based on project- and site-specific consideration to reduce impacts related to evacuation and wildfire. However, the impact related to evacuation is considered significant and unavoidable because MTC and ABAG cannot require local implementation agencies to adopt mitigation measures included in the EIR (see "Significance after Mitigation" on page 3.9-45 of the Draft EIR). Impacts related to wildfire are also considered to be significant and unavoidable because development could occur in and near State Responsible Areas and lands classified as very high fire hazard severity zones; and MTC and ABAG cannot require local implementation agencies to adopt mitigation measures included in the EIR (see "Significance after Mitigation" on page 3.9-51 of the Draft EIR).

Comment A3-8

3. Water Supply, Wastewater, Stormwater, and Landfill Capacity Are Significant and Unavoidable (SU)

The Draft EIR finds the following impacts to be Significant and Unavoidable (SU):

- Impact PUF-1 — Significant and Unavoidable (SU) if not fully mitigated: Environmental impacts from new or expanded utility infrastructure.

- Impact PUF-2 — Significant and Unavoidable (SU): Insufficient water supplies in normal, dry, and multiple-dry-year scenarios.

- Impact PUF-3 — Significant and Unavoidable (SU): Wastewater treatment capacity shortfalls.
- Impact PUF-4 — Significant and Unavoidable (SU): Solid waste and landfill capacity limitations.

Regional landfill facilities are already operating near capacity, and many jurisdictions face long-term solid waste constraints that the Draft EIR does not fully address. Similarly, stormwater systems in numerous Bay Area communities are undersized or at or near capacity, particularly under projected climate-driven increases in extreme precipitation. These constraints contribute to the Draft EIR's findings that solid waste and stormwater impacts remain Significant and Unavoidable (SU).

Response A3-8

The comment summarizes the impact conclusions related to public utilities and facilities as discussed in the Draft EIR pages 3.14-35 through 3.14-50 (Impacts PUF-1 through PUF-4). The comment also states that the Draft EIR does not fully address the jurisdictions that are facing long-term solid waste constraints and states that stormwater systems in numerous Bay Area communities are undersized or at or near capacity. The comment does not raise environmental issues or concerns regarding Impact PUF-2 and PUF-3.

Solid waste facilities and their capacities in the Bay Area are discussed on pages 3.14-16 through 3.14-19 of the Draft EIR. Specifically, the active Bay Area landfills and their remaining capacities are presented in Table 3.14-5 of the Draft EIR. Impact PUF-4 (Draft EIR pages 3.14-47 through 3.14-50) addresses the potential impact of plan implementation on Bay Area landfill facilities. While impacts related to solid waste are considered significant, Mitigation Measure PUF-4 would reduce impacts associated with solid waste generation. However, it is uncertain whether the impact would be reduced to a less-than-significant level for reasons discussed in Section 3.14, "Public Utilities and Facilities" and referenced in "Master Response 2 Mitigation Measures." Therefore, the impact is considered significant and unavoidable.

Page 3.14-16 of the Draft EIR discusses the current stormwater discharge permits, regulations, and programs in the Bay Area and its counties. Impact PUF-1 (Draft EIR pages 3.14-35 through 3.14-42) includes a discussion of the proposed plan's effects on the stormwater capacity of existing systems and identifies the potential to construct new stormwater systems due to development associated with the proposed plan. The discussion of potential impacts on stormwater systems acknowledges their current limitations and thus proposes Mitigation Measures PUF-1(b), PUF-1(c), and PUF-1(d) to help reduce the impact associated with exceedances of existing stormwater drainage capacity. However, it is possible that relocation or construction of stormwater systems could result in significant and unavoidable effects on the environment. Therefore, the impact is considered significant and unavoidable.

Comment A3-9

The Draft EIR is internally inconsistent: project-level and program-level water-supply impacts under Impact PUF-2 are Significant and Unavoidable (SU), yet cumulative hydrology and water-resource impacts in the Other CEQA-Mandated Sections are classified as "less than significant (LTS)." This is not credible, as cumulative impacts cannot be less severe than project-level Significant and Unavoidable (SU) impacts. Many of the region's water, wastewater, and stormwater facilities lie in sea-level-rise zones, yet the Draft EIR relies on external agencies to undertake future adaptation projects without identifying funding, timelines, feasibility, or enforceable regional mitigation measures. Accordingly, these infrastructure impacts remain Significant and Unavoidable (SU).

Response A3-9

Please refer to "Master Response 4: Program Level Document." The Draft EIR is a program level EIR and does not include project level analysis.

The commenter notes inconsistences among impact conclusions but does not provide specifically which impact conclusions for water supply and hydrology are inconsistent and to which other CEQA mandated sections they are referring. Additionally, the commenter notes an inconsistency in the project and cumulative impact conclusions for two different topics – water *supply*, which is addressed as part of the Utilities impact analysis, and water *quality*, which is addressed under Hydrology and Water Quality impact analysis - for both project- and cumulative-level impacts.

Impact PUF-2 in the Draft EIR relates to project-level water supply impacts and does not include an analysis of hydrology. Impact PUF-2 (Draft EIR pages 3.14-42 through 3.14-45) includes a discussion of project-level water supply impacts and concludes that impacts would be significant and unavoidable for reasons discussed in the impact analysis and referenced in "Master Response 2: Mitigation Measures." Cumulative water supply impacts are analyzed on pages 5-19 and 5-20 of the Draft EIR. Under CEQA, the discussion of cumulative impacts focuses on whether the incremental effect of the project would be cumulatively considerable. There are cases in which a cumulative impact may be less severe than project level impact, as an EIR may determine that a project's contribution to a significant cumulative impact will be considered less than cumulatively considerable and thus is not significant, even where a project-level impact is determined to be significant. As concluded in the Draft EIR, the proposed plan's contribution to a cumulative water supply impact would be cumulatively considerable. Because it cannot be concluded with certainty that water supply impacts would be mitigated to a less-than-significant level, the cumulative water supply impact would be significant and unavoidable. Therefore, the Draft EIR's findings on water supply impacts under the proposed plan and its contribution to a cumulative water supply impact are consistent.

Pages 3.10-24 through 3.10-46 of the Draft EIR (Impacts HYDRO-1 through HYDRO-6) evaluate the proposed plan's impacts associated with water quality and hydrology and conclude that the impacts would be less than significant with compliance with local, state, and federal regulations. Cumulative water quality and hydrology impacts are discussed on pages 5-17 of the Draft EIR and are similarly determined to be less than significant. Therefore, the Draft EIR's conclusions regarding water quality and hydrology impacts under the proposed plan and its contribution to a cumulate impact are consistent.

Impacts related to infrastructure (i.e., water, wastewater, and stormwater facilities) are discussed under Impact PUF-1 (Draft EIR pages 3.14-35 through 3.14-42) and Impact PUF-3 (Draft EIR pages 3.14-45 through 3.14-47). Mitigation measures are identified to reduce impacts related to water, wastewater, and stormwater facilities. Please refer to "Master Response 2: Mitigation Measures" for a discussion of MTC and ABAGs land use authority. MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the infrastructure impacts are considered significant and unavoidable. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation, because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time. The EIR discloses a menu of potential mitigation measures that could be applied at the project-level; however, for the reasons stated above, MTC acknowledges that application of such measures would be the responsibility of the lead agency conducting environmental review under CEQA. As a result, there is inherent uncertainty in the degree of mitigation that would ultimately be implemented to reduce potentially significant impacts identified in the Draft EIR. Consequently, the Draft EIR acknowledges this in its post-mitigation significance conclusions (i.e., concluding that feasible mitigation may not be sufficient) and discloses that potentially significant environmental impacts may be unavoidable, where appropriate.

Comment A3-10

4. Hospitals, Emergency Services, Police, Fire, and Schools — Mitigation Deferred; Impacts Remain Significant and Unavoidable (SU)

Under Impact PSR-1 — Significant and Unavoidable (SU) if mitigation is not fully implemented, the Draft EIR identifies increased demand for:

- Fire and police services,
- Emergency Medical Services (EMS),
- Hospital and Emergency Room (ER) capacity,
- Hospital and Emergency Room (ER) capacity,
- K–12 school facilities, including special education,
- Libraries and civic facilities.

The Draft EIR provides no regional analysis of hospital or ER capacity, fire/EMS response-time feasibility, police staffing constraints, or school district facility needs. Because mitigation consists of voluntary, future local actions, PSR-1 remains Significant and Unavoidable (SU).

Response A3-10

Impact PSR-1 (Draft EIR pages 3.13-11 through 3.13-15) discusses the potential for implementation of the proposed plan to result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities in order to maintain acceptable performance objectives for fire protection, police protection, schools, parks, and other public facilities. Mitigation Measure PSR-1 is identified to reduce the severity of environmental effects related to the construction of new or expanded public service facilities, such as those mentioned by the commenter. Please refer to "Master Response 2: Mitigation Measures" and Response A3-9 for a discussion of MTC and ABAG's land use authority and ability to ensure that plan impacts are mitigated to a less-than-significant level. As described, some impacts in the EIR are considered to be significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt mitigation measures included in the EIR and thus cannot guarantee whether and how the mitigation measures will be implemented. Additionally, Impact PSR-1 concludes that impacts would be significant and unavoidable because the construction of new and expanded public service facilities would contribute to impacts on aesthetics, agriculture and forestry resources, air quality, biological resources, greenhouse gas emissions, cultural and tribal cultural resources, hazards and hazardous materials, land use, noise, public utilities, and transportation that cannot be reduced to less-than-significant levels with implementation of mitigation measures identified throughout the Draft EIR.

Comment A3-11

5. Air Quality, Seismic, Flooding, and Hazardous Materials Impacts Are Under-Analyzed; Many Are Significant and Unavoidable (SU)

The following impacts remain Significant and Unavoidable (SU) or are inadequately mitigated:

- Impact AQ-2 — Significant and Unavoidable (SU) if not fully mitigated: Freeway-adjacent pollutant exposure for sensitive receptors.
- Impact AQ-3 — Significant and Unavoidable (SU): Conflict with air-quality plans.

- Impact NOI-1 / NOI-2 — Significant and Unavoidable (SU): Construction and traffic noise.
- Impact GEO-1 through GEO-5: Seismic and liquefaction hazards in unstable-soil or bayfill areas (classified as Less Than Significant with Mitigation, but still substantial).
- Impact GEO-1 through GEO-5: Seismic and liquefaction hazards in unstable-soil or bayfill areas (classified as Less Than Significant with Mitigation, but still substantial).
- Impact BIO-1 through BIO-4 — Significant and Unavoidable (SU): Biological resource impacts, including riparian disturbance and habitat fragmentation.

Many Priority Development Areas (PDAs) lie immediately adjacent to freeways— corridors with some of the highest PM2.5 and ultrafine particle concentrations in the state. The Draft EIR underestimates these risks by relying largely on existing regulations and generalized best practices rather than enforceable, performance-based mitigation, leaving freeway-adjacent air-quality impacts Significant and Unavoidable (SU) where local implementation is uncertain.

Response A3-11

Impact AQ-2 of the Draft EIR addresses construction-related air pollutant emissions and evaluates them for their potential to exceed air district thresholds. Impact AQ-2 does not discuss the potential for sensitive receptors to be exposed to operational emissions from freeways, as the comment states. Rather, Impact AQ-4, on pages 3.4-53 through 3.4-64 of the Draft EIR evaluates the potential environmental and health-related impacts associated with receptors located near high-volume freeways at a programmatic, regional level. Mitigation Measures AQ-4(a), AQ-4(b), and AQ-4(c) through AQ-4(d) are identified to minimize the exposure of receptors near freeways to substantial pollutant concentrations that could have adverse health outcomes. For example, Mitigation Measure AQ-4(a) (pg. 3.4-61 through 3.4-62 of the Draft EIR) identifies potential measures that implementing agencies and project sponsors can implement for future projects where feasible. Potential measures identified under Mitigation Measure AQ-4(a) include the use of air intake systems in buildings, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13 (MERV-16 for projects located in the West Oakland Specific Plan area) and implementing measures to reduce emissions from diesel trucks such as installing electrical hook-ups for diesel trucks at loading docks to encourage electric truck use and requiring trucks to use transportation refrigeration units that meet Tier 4 emission standards. Mitigation Measure AQ-4(b) (page 3.4-62 of the Draft EIR) requires that ABAG partner with the Bay Area Air District and local lead agencies to develop a program to install air filtration devices in existing residential buildings, and other buildings with sensitive receptors, located near freeways or sources of TACs and $PM_{2.5}$. Lastly, Mitigation Measure AQ-4(d) (page 3.4-63 of the Draft EIR) requires that the implementing agency implement the strategies identified in the CARB Technical Advisory to reduce air pollution exposure near high-volume roadways to less-than-significant levels, where feasible. Measures listed under Mitigation Measure AQ-4(d) include using speed reduction mechanisms, such as roundabouts to reduce the frequency of stop-and-go driving common among streets that support stop signs, using traffic signal management to limit the frequency of stop-and-go driving and vehicle idling, and establishing and enforcing speed limit reductions of high-speed roadways.

The use of “if feasible” language is appropriate for programmatic mitigation because MTC and ABAG cannot require local jurisdictions to adopt mitigation measures for future projects and is consistent with statutory provisions for streamlining under SB 375. Local agencies retain discretion over project-level implementation, including funding, design, and approval of mitigation measures. Refer to “Master Response 2: EIR Mitigation Measures” regarding MTC and ABAG’s obligation to disclose potential impacts and identify feasible mitigation measures.

Impact AQ-3 of the Draft EIR evaluates the potential for the proposed plan to result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard. Impact AQ-3 does not specifically evaluate the proposed plan's consistency with an applicable air quality plan, as the comment states. Rather, Impact AQ-1 on pages 3.4-34 through 3.4-41 of the Draft EIR evaluates the proposed plan's consistency with the applicable air quality plans (i.e., the 2017 Clean Air Plan and Yolo-Solano Air Quality Management District [YSAQMD] Triennial Plan). As stated under Impact AQ-1 on page 3.4-41 of the Draf EIR, "The proposed plan's core objectives and strategies align with and would support the implementation of the 2017 Clean Air Plan and YSAQMD Triennial Plan. Because the proposed plan would not conflict with or obstruct implementation of the primary goals, applicable control measures, or implementation of any control measures of the Bay Area Air District's 2017 Clean Air Plan and YSAQMD Triennial Plan, the impact would be less than significant (LTS)." Therefore, no mitigation is required.

Impacts NOISE-1 and NOISE-2 of the Draft evaluate impacts related to short-term and long-term increase of ambient noise levels, respectively. Implementation of Mitigation Measure NOISE-1 would provide reductions in daytime and nighttime shore-term construction noise levels. However, there could be cases where noise-level reductions from implementation of mitigation would not be sufficient to reduce noise to an acceptable level. This impact would remain significant and unavoidable. Implementation of Mitigation Measures NOISE-2(a) through NOISE-2(c) would reduce long-term noise impacts to a less-than-significant level. However, MTC and ABAG cannot require local implementing agencies to adopt the mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be significant and unavoidable for purposes of this program-level review.

Impacts GEO-1 through GEO-5 are determined to be less than significant and no mitigation is required. Please refer to pages 3.8-21 through 3.8-35 for a detailed discussion for Impacts GEO-1 through GEO-5.

Impacts BIO-1a and BIO-1b evaluate impacts on special-status species and impacts on designated critical habitat, respectively. Impact BIO-1a could be reduced to a less-than-significant level with implementation of Mitigation Measure BIO-1(a). However, MTC and ABAG cannot require local implementing agencies to adopt the mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be significant and unavoidable for purposes of this program-level review. Impact BIO-1b would be reduced to a less-than-significant level with implementation of Mitigation Measure BIO-1(b). Because Mitigation Measure BIO-1(b) is tied to existing regulations that are law and binding on responsible agencies and project sponsors, it is reasonable to determine that they would be implemented.

Impact BIO-2 evaluates impacts related to riparian habitats, wetlands, or other sensitive natural communities. Because Mitigation Measure BIO-2 is tied to existing regulations that are law and binding on responsible agencies and project sponsors, it is reasonable to determine that they would be implemented, Impact BIO-2 would be less than significant with implementation of Mitigation Measure BIO-2.

Impact BIO-3 evaluates impacts related to migratory wildlife corridors and native wildlife nursery sites. Impact could be reduced to a less-than-significant level with implementation of Mitigation Measures BIO-3(a) and BIO-3(b). However, MTC and ABAG cannot require local implementing agencies to adopt Mitigation Measure BIO-3(a), and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be significant and unavoidable for purposes of this program-level review.

Impact BIO-4 evaluates impacts related to conflict with local policies, ordinances, an adopted habitat conservation plan (HCP), a natural community conservation plan, or other approved HCP. Implementation of the proposed plan would be required to follow city and county development requirements, including compliance with local policies, ordinances, and applicable permitting procedures related to protecting

biological resources. Additionally, consistency with an adopted HCP or other conservation plan is a legal requirement, and the design, approval, and permitting of future development and transportation projects within an area covered by an HCP or other conservation plan are intended and expected to comply with that requirement. This impact would be less than significant and no mitigation is required.

Regarding the risk of exposure to fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less ($PM_{2.5}$) and ultrafine particulates, related impacts are discussed under Impact AQ-4 (pages 3.4-53 through 3.4-64), which evaluates impacts related to exposing sensitive receptors to substantial pollutant concentrations, including $PM_{2.5}$. The Draft EIR concludes that the proposed plan could result in changes in total $PM_{2.5}$ exposure levels that disproportionally impact Overburdened Communities. These impacts would vary across counties. Implementation of Mitigation Measures AQ-2 and AQ-4(a) through AQ-4(d) would result in reduced emissions and lower exposure levels near sensitive receptors. However, the exact reductions are not known at this time. Therefore, this impact would be significant and unavoidable.

Please refer to "Master Response 2: EIR Mitigation Measures" regarding significant and unavoidable impact determination and enforceable mitigation measures. Also refer to "Master Response 4: Program Level Document" regarding program-level analysis.

The comment does not raise any specific issue with the EIR's conclusions summarized herein.

Comment A3-12

Many Plan Bay Area growth areas are projected to face tidal flooding, storm-surge impacts, overtopping of levees, or sea-level-rise hazards by 2050 and 2100. The Draft EIR repeatedly cites future coordination with external agencies to address these risks but does not identify funding, timelines, feasibility, or enforceable mechanisms for implementation. This constitutes mitigation deferral, which is not permissible unless performance standards and enforcement mechanisms are established.

Mitigation in this section depends heavily on existing regulations or discretionary local actions, without enforceable regional performance standards. As a result, these impacts remain Significant and Unavoidable (SU).

Response A3-12

While the plan has incorporated sea level rise adaptation infrastructure as a plan component, it is important to note the effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions, as concluded by the California Supreme Court (see *California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369, 377 ["we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."]). Accordingly, the proposed plan contains elements that would reduce the effects of sea level rise, and therefore, the EIR analysis generally does not address the impacts of existing environmental conditions on a project's future users or residents. However, when a proposed project risks exacerbating environmental hazards or conditions that already exist, the EIR analyzes the potential impact of such hazards on future residents or users.

Section 3.10, "Hydrology and Water Quality," of the Draft EIR address plan impacts related to flooding and related effects. As discussed in Section 3.10 of the Draft EIR, impacts related to flooding were determined to be less than significant through compliance with existing regulations that require that projects provide low impact development drainage design, improve stormwater retentions, and maintain pre-project hydrology. In addition, development near the coast would be subject to the California Coastal

Commission's Coastal Development Permit, which would require protection of coastal watersheds. The California Coastal Act also provides the California Coastal Commission with authority to control development that contributes to flooding and surface alterations in and around the development site. By assuming that compliance with these regulatory requirements would avoid or lessen impacts, the EIR determines that no mitigation is required. Please refer to "Master Response 2: Mitigation Measures" regarding the enforceability of mitigation measures included in the Draft EIR including funding mechanisms available for the plan, feasibility of mitigation, mitigation deferral, and significant and unavoidable impacts.

Comment A3-13

6. Transportation, Vehicle Miles Traveled (VMT), Congestion, and Evacuation Impacts Are Significant and Unavoidable (SU)

The Draft EIR identifies the following transportation and evacuation-related impacts as Significant and Unavoidable (SU):

- Impact TRA-2 — Significant and Unavoidable (SU): Conflicts with CEQA Vehicle Miles Traveled (VMT) standards.
- Impact TRA-4 — Significant and Unavoidable (SU): Emergency access delays and evacuation constraints.
- Impact HAZ-6 — Significant and Unavoidable (SU): Increased population and congestion impair emergency response and evacuation performance.

Evacuation performance is not evaluated for earthquakes, Public Safety Power Shutoff (PSPS) events, flooding, or multi-hazard scenarios. The Draft Plan nonetheless places substantial growth in evacuation-constrained corridors.

Impact HAZ-6 highlights a critical fact: concentrating growth in certain corridors under the proposed plan can worsen traffic-related evacuation constraints, even if per-capita Vehicle Miles Traveled (VMT) is reduced region-wide.

Response A3-13

The commenter is correct that the Draft EIR concludes that VMT impacts would be significant and unavoidable (Impact TRA-2); and impacts related to impairing implementation of, or physically interfering with, an adopted emergency response plan or emergency evacuation plan would be significant and unavoidable (Impact HAZ-6). Impacts related to inadequate emergency access were determined to be less than significant (Impact TRA-4). Please refer to Section 3.15, "Transportation," for a discussion of impacts related to inadequate emergency access.

Emergency response and emergency evacuation plans are designed by the Office of Emergency Services for each county in the region to respond to a possible emergency situation (e.g., fires, floods, earthquakes). Impact HAZ-6 of the Draft EIR evaluates whether implementation of the proposed plan would impair implementation of, or physically interfere with, and adopted emergency response plan or emergency evacuation plan. The analysis considers evacuation under emergency of various hazard scenarios, including earthquakes and flooding. Public safety power shutoff events do not necessitate evacuation. However, if evacuation is required during power shutoff, evacuation would be conducted in accordance with the local emergency response and emergency evacuation plans. Implementation of Mitigation Measure HAZ-6 would address the impacts to emergency response and emergency evacuation plans. Specifically, Mitigation Measure HAZ-6 would address the need for adequate emergency access through continue participation in the San Francisco Bay Area Regional Transportation Emergency

Management Plan. Mitigation Measure HAZ-6 would also require that emergency plans account for shifting transportation modes and require individual projects to ensure that future development would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evaluation plan. However, MTC and ABAG cannot require local implementing agencies to adopt the mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, the impacts would remain significant and unavoidable. Please refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable impacts.

Comment A3-14

7. Funding Risks and Unfunded Local Liabilities

The Draft Plan and Draft EIR assume that local governments, utilities, school districts, and special districts will fund and deliver many of the improvements needed to support Plan Bay Area 2050+ growth. However, many of these obligations lack identified funding, creating substantial uncertainty about the feasibility of required mitigation.

- Local Funding Required for Major Mitigations

Several impacts identified as Significant and Unavoidable (SU)—including fire and police protection, Emergency Medical Services (EMS), hospital and ER capacity, K–12 and special-education facilities, water supply reliability, wastewater and stormwater capacity, flood protection, and evacuation performance—are expected to be addressed using local agency resources, with no secured regional, state, or federal funding.

- Reliance on Developer Impact Fees and Utility Rates

The Draft EIR assumes that water, wastewater, stormwater, solid-waste, and school facilities will be funded through developer impact fees, capacity/connection fees, and customer utility rates. Recent State legislation, including SB 937 (fee deferral) and AB 602 (fee constraints), makes these revenue sources increasingly uncertain and inconsistent with the Plan's assumptions.

- Major Regional Initiatives Without Funding

Large-scale Plan strategies—such as the EN1 sea-level-rise adaptation program (estimated at $96 billion, with only $6 billion identified), major transit expansions, and regional housing initiatives—depend on future regional tax measures and new State or federal funding that have not been secured.

Together, these gaps create significant unfunded liabilities for local jurisdictions. Many impacts remain Significant and Unavoidable (SU) not because mitigation is infeasible, but because no reliable funding mechanism has been established to carry it out.

Response A3-14

Please refer to Response A3-4 and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," which address the role of planning-level investment assumptions in the plan, the uncertainty associated with future grant funding and potential revenue measures, and the distinction between aspirational investment needs and secured/programmed funding.

Plan Bay Area 2050+ is a long-range strategy framework and does not allocate funding responsibility for public services or utilities to local agencies. Provision of water, wastewater, stormwater, solid waste, schools, emergency services, and flood protection is the responsibility of the applicable local agencies and service providers with the authority to plan, finance, and implement such improvements. Local jurisdictions retain land use authority, and implementation of development projects remains subject to applicable regulations and project-level review, including CEQA review where required.

The Draft EIR presents a programmatic assessment of potential impacts, focusing on the entire set of projects, programs, and strategies contained in the proposed plan. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time. When subsequent projects are proposed consistent with the approved plan, they will be evaluated to determine if the program EIR adequately addressed the impacts and mitigation measures associated with the subsequent project, and whether additional CEQA compliance is necessary. Please refer "Master Response 4: Program Level Document" for a discussion of the level of environmental analysis prepared for the plan and what is feasible to analyze at this level of detail.

Please refer to Response A3-10 and "Master Response 2: Mitigation Measures" for a discussion of MTC and ABAG's obligation to disclose potential impacts, identify feasible mitigation measures, and conclude significant and unavoidable findings. For many sections, impacts have been identified as significant and unavoidable because MTC and ABAG do not have regulatory or approval authority over a future project implemented pursuant to the proposed plan. Therefore, mitigation measures of the proposed plan would be implemented only insofar as local jurisdictions determine their feasibility and approve them for projects under the plan. Consequently, the Draft EIR acknowledges this in its post-mitigation significance conclusions (i.e., concluding that feasible mitigation may not be sufficient) and discloses that potentially significant environmental impacts may be unavoidable, where appropriate.

SB 50 states that that payment of developer fees is "deemed to be complete and full mitigation" of the impacts related to planning, new development, or change in government organization relating to educational facilities. The impacts in Section 3.14, "Public Services and Utilities" do not rely on developer impact fees for impact findings related to water, wastewater, and solid waste. Mitigation Measures PUF-2(a) and PUF-3 in the Draft EIR require future projects under the plan to determine if sufficient water and wastewater capacity is available and if not available to coordinate with the applicable service provider to ensure adequate public services can accommodate the demand. Mitigation Measure PUF-4 requires land use and transportation projects to apply landfill diversion approaches to reduce the amount of solid waste in area landfills.

Comments related to plan Strategy EN1 and funding do not raise environmental issues or concerns related to the adequacy of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A3-15

City Council Requests

A. Corrections and Technical Revisions

   i. Align growth assumptions with California Department of Finance (DOF) and Demographic Research Unit (DRU) projections.

   ii. Add Reduced-Growth, Remote-Work, and AI-Impact alternatives.

   iii. Resolve inconsistencies between PUF and HYDRO findings.

   iv. Include enforceable, performance-based mitigation for wildfire, emergency evacuation, water supply, wastewater, hospitals, and schools.

   v. Ensure that development in high wildfire-hazard areas proceeds only where enforceable mitigation measures – such as adequate evacuation capacity and firehardnening standards – are in place.

vi. Ensure that development in high flood-risk or sea-level-rise-vulnerable areas proceeds only where long-term flood protection and clearly defined, feasible, and enforceable mitigation measures are assured.

Response A3-15

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plans forecasted population and employment growth.

Please refer to Response A3-9 regarding PUF and HYDRO findings.

Please refer to "Master Response 2: Mitigation Measures," Response A3-8, Response A3-10, and Response A3-14 regarding the enforceable mitigation measures included in the Draft EIR for wildfire, emergency evacuation, water supply, wastewater, hospitals, and schools.

Please refer to Response A3-7 regarding wildfire hazard area mitigation.

Please refer to "Master Response 3: Plan Alternatives" regarding the request for reduced growth, remote work, and artificial intelligence alternatives.

As stated on page 2-11 of the Draft EIR the land use growth footprint for the plan is a result of existing zoning and other land use policies, the regional growth forecast, and the proposed plan's Growth Geographies and 35 integrated strategies. Additionally, the plan's sea level rise adaptation projects (Strategy EN 1) build on local and regional planning efforts, incorporating a range of actions to mitigate inundation and storm surge impacts. Please refer to Response A3- regarding flooding mitigation.

Comment A3-16

B. Mitigation Improvements

i. Require development in wildfire-hazard areas to meet minimum evacuation capacity ratios, fire-hardening requirements, and defensible-space implementation before growth allocations are approved.

ii. Mitigation should address ER, ICU, and behavioral-health capacity triggered by population growth, rather than deferring to unfunded future local expansions.

iii. Conduct regional analyses of wastewater, stormwater, landfill, and electric-grid capacity.

iv. Adopt functional-recovery standards so critical facilities and corridors remain operable—or recover quickly—after earthquakes, wildfires, or extreme-weather events.

v. Identify funding gaps for major Plan strategies—such as the $96 billion EN1 sea level-rise program—and evaluate feasible phased or reduced-scale alternatives where funding is uncertain.

vi. Provide an assessment of the local capital and operating costs needed to support Plan Bay Area 2050+ growth, including the extent to which cities, counties, school districts, utilities, and special districts would need to rely on developer impact fees and local revenues.

vii. Reconcile the Plan's reliance on developer impact fees with recent State legislation that limits fee timing and justification.

Response A3-16

The comment suggests mitigation improvements, but does not specify which mitigation measures should be improved. It is up to the lead agency's discretion to propose feasible mitigation measures where

required to avoid or minimize an impact. Please refer to Response A3-7 regarding wildfire mitigation, Response A3-10 regarding public services mitigation, Responses A3-8, A3-9, and A3-12 regarding utilities mitigation, and Response A3-11 regarding hazard mitigation. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding funding requests.

Comment A3-17

C. Transparency

i. Clearly identify all impacts that are Significant and Unavoidable (SU).

ii. Provide a thorough Statement of Overriding Considerations if adopting the Plan despite its Significant and Unavoidable (SU) impacts.

Response A3-17

The Draft EIR identifies all significant and unavoidable impacts in Table ES-1 of the Executive Summary and Chapter 3 by explicitly labeling each Significant and Unavoidable impact in bold as "Significant and Unavoidable (SU)" and presenting these determinations within the impact analysis under the subheading "Significance After Mitigation." Therefore, the Draft EIR clearly identifies all significant and unavoidable impacts in accordance with CEQA requirements.

If the decision-making body (MTC Commission and ABAG Executive Board) elects to approve the plan despite its significant and unavoidable impacts, they will be required to adopt a written Statement of Overriding Considerations that identifies the specific economic, legal, social, technological, or other benefits that outweigh those significant impacts. The Statement of Overriding Considerations will be prepared as part of the Final EIR package for the project. The Draft EIR and Final EIR provide the environmental analysis and impact determinations that will inform the Statement of Overriding Considerations, but preparation and adoption of the Statement of Overriding Considerations itself will occur as part of the separate public hearing and approval process, consistent with CEQA Guidelines Section 15093.

Comment A3-18

In conclusion, the Draft Plan and Draft EIR do not yet demonstrate enforceable mitigation or provide sufficiently realistic, internally consistent analysis. To protect public safety, ensure infrastructure and environmental resilience, and maintain fiscal responsibility, the City Council urges MTC and ABAG to revise both documents accordingly.

Response A3-18

This comment is a summary statement and does not provide any specifics on the unrealistic or inconsistent analysis in the Draft EIR. Please refer to "Master Response 2: Mitigation Measures" regarding the enforceability of mitigation measures contained in the Draft EIR and Responses A3-7 through A3-15 regarding internal inconsistencies in the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A4 City of Pleasant Hill

Troy Fujimoto, City Planner
December 12, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A4-1

To Whom it May Concern:

Thank you for providing the Notice of Availability for the Draft Environmental Impact Report (Draft EIR) (SCH# 2025010348) for Plan Bay Area 2050+ (proposed Plan). After review of the document, we noted that the projected increase in population in Plan Bay Area 2050+, for the nine-county Bay Area appears inconsistent with the California Department of Finance (DOF) projections. The DOF identifies a population increase to 8,149,816 in the year 2050, whereas Plan Bay Area 2050+ projects 9,599,000. We also observed that the 2023 base year population figures are relatively similar to each other, with 7,588,421 shown by DOF and 7,465,000 shown in Plan Bay Area 2050+.

Could you please provide an explanation of the basis for the Plan Bay Area 2050+ projections to be significantly higher than DOF projections. The City is concerned that out-sized estimates in population could lead to burdensome requirements to address this growth in the future.

Thank you for consideration of our concerns.

Response A4-1

The commenter requests clarification regarding differences between the Plan Bay Area 2050+ regional population projection and California Department of Finance (DOF) population projections. Please refer to "Master Response 1: Regional Growth Forecast" regarding an explanation of the proposed plan's forecasted population growth.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter A5 East Bay Municipal Utility District

David Rehnstrom, Manager of Water Distribution Planning
December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A5-1

Dear Mr. Noelting:

East Bay Municipal Utility District (EBMUD) appreciates the opportunity to comment on the Draft Environmental Impact Report (EIR) for the Plan Bay Area 2050+ Project located in the counties of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma. EBMUD has the following comments

Response A5-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A5-2

On page 3.4-60, second paragraph, under the Transportation System Impacts section and the Effects on Overburdened Communities subsection, EBMUD recommends the revised language, shown below in strikeout and bold italics, because this part of the Draft EIR applies not only to the two listed West Oakland facilities, but rather to all facilities subject to Rule 11-18. Additionally, EBMUD does not expect a 70% reduction in toxic air contaminants (TAC) emissions due to Rule 11-18. EBMUD's health risk to the surrounding community due to TAC emissions is not expected to be significant and any reductions will be less than 70%.

Sources contributing TAC and PM2.s emissions reductions in the 27-year timeframe (2023-2050) also include:

- Street sweeping, potentially reducing road dust emissions by 10%;
- Cleaner locomotive engines;
- The Bay Area Air District's Rule 11-18, which will potentially reduce TACs from t~~he East Bay Municipal Utility District and Schnitzer Steel by an estimated 70%~~ regulated facilities within several overburdened communities-in the region; and
- Better enforcement and incentives discourage backyard burning and limiting residential fuel combustion.

Response A5-2

Page 3.4-60 of the Draft EIR has been revised with the additional text to clarify that all facilities would be subject to Rule 11-18. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A5-3

On page 3.5-31, under the Habitat Conservation Plans section, EBMUD recommends adding the following description of its Low Effect Habitat Conservation Plan which is currently missing:

East Bay Municipal Utility District Low Effect Habitat Conservation Plan

The East Bay Municipal Utility District (EBMUD) Low Effect Habitat Conservation Plan (HCP) covers maintenance activities on EBMUD 's 30,000 acres of watershed lands in the East Bay. The HCP was implemented in July of 2008 and has a 30-year permit term. EBMUD activities covered under the HCP include programs for water quality, biodiversity, forestry, livestock grazing, agricultural operations, fire and fuel management, recreation and developed trails, and the storage and removal of trench spoils. EB MUD 's HCP protects and enhances the natural ecosystems that support native species in the East Bay. The HCP covers seven species: four listed species and three that may be listed during the 30-year course of the plan. The HCP identifies existing vegetation communities, identifies covered species, and describes the measures EBMUD will employ to avoid impacts from operational activities on watershed lands. The HCP only covers activities on EBMUD East Bay watershed and does not provide coverage for maintenance or infrastructure projects within EBMUD 's 332 square mile service area.

Response A5-3

Page 3.5-31 of the Draft EIR has been revised with the additional text to add a description of the East Bay Municipal Utility District Low Effect Habitat Conservation Plan. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A5-4

On page 3.14-9, second paragraph, under the Water Supply Sources section and the Desalination subsection, EBMUD recommends the following revisions, shown below in strikeout and bold italics, to better characterize the collaborative effort by the Bay Area Regional Reliability (BARR) partners:

~~In 2003, ACWD opened the Newark Desalination Facility, the first brackish water desalination facility in northern California, with a capacity of 5 mgd, and it doubled the production to 10 mgd for a total blended production of 12.5 mgd to the distribution system.~~ Eight water agencies in the Bay Area, consisting of Alameda County Water District (ACWD), Bay Area Water Supply and Conservation Agency (BAWSCA), Contra Costa Water District (CCWD), EBMUD, Marin Municipal Water District (MMWD), San Francisco Public Utilities Commission (SFPUC), Santa Clara Valley Water District (SCVWD, and Zone 7 Water Agency (Zone 7), ~~(ACWD, BAWSCA, CCWD, EBMUD, MMWD, SFPUC, SCVWD, and Zone 7 Water Agency)~~ are working together to investigate opportunities for collaboration. The purpose of this planning effort, known as Bay Area Regional Reliability (BARR), is to identify projects and processes to enhance water supply reliability across the region, leverage existing infrastructure investments, facilitate water transfers during critical shortages, and improve climate change resiliency. Projects to be considered will include interagency interties and pipelines, treatment plan improvements and expansion, groundwater management and recharge, potable reuse, desalination, and water transfers. While no specific capacity or supply has been identified, this program may result in additional future supplies that would benefit Bay Area Customers (Brown and Caldwell 2017). A regional desalination project was evaluated by five of the eight BARR agencies between 2003 and 2013. While the project is currently not being pursued, several BARR agencies have expressed interest in potentially moving forward with it in the future *if* external funding support becomes available. Additionally, ACWD, SFPUC, and Union Sanitary District developed a conceptual level project that envisions using ACWD's Newark Brackish Groundwater Desalination Plant and SFPUC's Bay Division Pipeline to provide emergency supplies and water transfer opportunities.

If you have any questions concerning this response, please contact Sandra Mulhauser, Senior Civil Engineer, Major Facilities Planning Section

Response A5-4

Page 3.14-9 of the Draft EIR has been revised with the additional text to better characterize the collaborative effort by the Bay Area Regional Reliability partners. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A6 City of Lafayette

Carl Anduri, Mayor
December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A6-1

Dear MTC and ABAG Board Members,

Thank you for the opportunity to comment on Draft Plan Bay Area 2050+ and the Draft EIR. While the City of Lafayette conceptually supports many of the thirty-five strategies intended to increase housing

production, reduce commute times, and foster vibrant downtowns and natural areas, we remain concerned about several core elements of the Plan. Specifically, we question the foundational assumptions on which the Plan is based, the continued erosion of local land use authority, and the imposition of unfunded mandates on local governments.

By reference, we also express our support for the comments submitted by the City of Cupertino in its letter dated December 2, 2025.

Response A6-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to Responses A23-1 through Responses A23-15 for the City of Cupertino letter incorporated by reference and "Master Response 1: Regional Growth Forecast" regarding the forecasted growth for the plan.

Comment A6-2

Comments

1. Problematic population projections

The lynchpin for the PBA 2050+ DEIR analysis is a set of population growth projections presented without any methodological support or documentation. Notably, the DEIR population projections are significantly higher than figures used by the State Department of Finance (DOF). We understand that State law gives the Department of Housing and Community Development the ability to develop alternative population projections. However, we question MTC/ABAG's legal authority to develop independent population projections rather than relying on the official DOF projections.

The discrepancy in population projections raised above is meaningful. As summarized in the table below, the DEIR projections are over 4.5 times higher than the DOF analysis for the nine Bay Area counties and over 7 times higher than projected growth for the State. Notably, the DEIR's growth projection for the Bay Area counties (1.8 million) exceeds the DOF projection for the entire state (1.3 million) by over 40%. Utilizing significantly higher projections with no analytical support represents a *deus ex machina* that leads directly to PBA's $1.38 trillion implementation program. While components of the PBA 2050+ programs may well be worthy, the entire structure of this massive undertaking rests on a very weak methodological foundation.

	2020	2035	2050	2020-2050 Incease	2020-2050 % Increase	2020-2050 Ann. Incr.(1)	Annual Increase Difference (2)
PBA Forecast (3)	7,749,000	8,476,000	9,586,000	1,837,000	23.7%	0.79%	-
DOF Bay Area (4)	7,748,408	7,816,027	8,149,816	401,408	5.2%	0.17%	4.6x
DOF California (5)	39,535,726	40,105,580	40,819,078	1,283,352	3.2%	0.11%	7.3x

(1) Arithmatic average for annual growth In the 2020-2050 period.
(2) Number of times by which PBA Forecast exceeds Department of Finance projections
(3) PBA 2050+ Regional Growth Forecast, DEIR Appendix A, page A-3
(4) Department of Finance, Forecasting webpage, County Population Projections (2020-2070) for the 9 Bay Area Counties
(5) Department of Finance, Forecasting webpage, State Population Projections (2020-2070)

Response A6-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment A6-3

2. Reliance on MTC's Transit-Oriented Communities Policy is premature, as its implementation measures have not yet been approved

MTC's Transit-Oriented Communities (TOC) Policy is a core component of PBA 2050+. It drives the implementation of PBA 2050+s vision by requiring and incentivizing cities and counties to plan for more housing and jobs near transit hubs to reduce driving and greenhouse gas emissions. The TOC Policy sets specific requirements for development within a half mile of existing or planned rail, ferry, and frequent bus service stops. In October 2025, Lafayette submitted a letter to the MTC Board expressing serious concerns about the TOC Policy Requirements Checklist (letter attached).

Reliance on MTC's Transit-Oriented Communities (TOC) Policy is premature and potentially unwise, as the Policy's implementation measures have not yet been formally approved. Basing key plan assumptions on a document still potentially subject to revision creates uncertainty and could require significant recalibration later.

Response A6-3

Regarding the Plan Bay Area 2050+'s reliance on MTC's Transit-Oriented Communities Policy, please refer to "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+."

Comment A6-4

3. Incorrect statements that the Plan will not override local land use decisions

Despite the Plan's assurances, Strategies H3 and H6 clearly establish land-use expectations that constrain local authority. H3 calls for allowing higher densities, broader housing types, reduced parking standards, streamlined approvals, and building code updates in PDAs, High-Resource Areas, and Transit-Rich Areas. These are not neutral suggestions; they imply specific zoning changes and reduced local discretion over development review, directly affecting how cities regulate land use. Strategy H6 predetermines future uses of major commercial sites. H6 directs jurisdictions to "permit and promote" conversion of malls and office parks into mixed-income neighborhoods. This effectively sets regional expectations for rezoning key commercial parcels, limiting local choices about economic development, fiscal impacts, and land-use priorities. Even if not explicitly mandatory, these strategies shape eligibility for regional funding, RHNA alignment, and plan conformity-creating strong pressure for local adoption.

Response A6-4

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The commenter correctly observes that Strategies H3 and H6 describe regional priorities related to land use, such as increased residential density, expanded housing types, reduced parking requirements, and the conversion of underutilized commercial sites. These strategies are intended to provide a regional planning framework consistent with the requirements of the Sustainable Communities Strategy under Senate Bill 375, which emphasizes coordinated regional land use and transportation planning approaches that reduce vehicle miles traveled and advance statewide climate and housing goals. The plan does not itself amend zoning or override local land use authority; rather, it is designed to illustrate the types of local actions that would be necessary to achieve the State's objectives, using incentives such as transportation funding alignment and CEQA streamlining rather than mandates. Any zoning or development regulation changes would remain subject to local discretion and local decision-making processes. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" for a discussion related to local land use control.

Comment A6-5

4. Imposition of potentially massive unfunded liabilities on local governments

The Draft Plan and Draft EIR place significant responsibility on local governments, utilities, school districts, and special districts to finance and implement the infrastructure and services needed to accommodate Plan Bay Area 2050+ growth. Yet many of these commitments lack secured funding sources, creating substantial uncertainty about whether the required improvements and mitigation measures can realistically be delivered. For example, with respect to just one component, housing, the Plan notes "needs dwarf existing revenues by $339 billion. Potential revenues to support the Housing Element could include any mix of federal, state, regional and local sources" (PBA 2050+, page 64). We are skeptical that the first three sources can deliver anything close to MTC's target. We are certain that local Bay Area communities cannot make good on such a funding demand.

Response A6-5

Please refer to “Master Response 2: Mitigation Measures” regarding the funding constraints for MTC and ABAG. The proposed plan, if adopted, would be advisory and not binding at the local level. Cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities implement projects under the plan. For this reason, unless MTC and ABAG have regulatory or approval authority over a future project implemented pursuant to the proposed plan, MTC and ABAG cannot assume financial responsibility for implementation of the proposed plan.

Comment A6-6

5. Mixed consideration of emergency evacuation issues

Our review of the planning document found no reference to "evacuation." Major wildfire is part of the East Bay's history. The San Francisco Chronicle recently called Orinda and Moraga—our neighboring communities-the "Bay Area's Pacific Palisades" given their fire risk (January 18, 2025). Lafayette and other communities face comparable risks. The PBA 2050+ document references "home hardening" measures, which Lafayette strongly supports. However, while the DEIR excludes land in Very High and High Fire Hazard Severity Areas from the Growth Geographies, in Lafayette's case, these areas are part of designated evacuation zones within a half mile of a rail station (Lafayette BART), which are included (DEIR, 2-33). This represents a significant safety issue which should be addressed in the PBA 2050+ document.

Response A6-6

Impacts related to impairing implementation of emergency response or evacuation plans are discussed under Impact HAZ-6 in Section 3.9, “Hazards and Wildfire,” of the Draft EIR. As discussed in Impact HAZ-6, implementation of the proposed plan would result in potentially significant impacts related to interference with emergency response and evacuation plan. Implementation of Mitigation Measure HAZ-6 would address the need for adequate emergency access through continue participation in the San Francisco Bay Area Regional Transportation Emergency Management Plan. Mitigation Measure HAZ-6 would also require that emergency plans account for shifting transportation modes and require individual projects to ensure that future development would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evaluation plan. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be significant and unavoidable for purposes of this program-level review. Please refer to Impact HAZ-6 of the Draft EIR (pages 3.9-41 through 3.9-45) for a discussion of impacts related to interference with emergency response and evacuation plan.

Comment A6-7

Based on these concerns and those outlined in Cupertino's letter, we conclude that PBA 2050+ and its DEIR projections may lead to policies that force communities to plan and zone for growth that will not materialize, potentially misguiding future infrastructure investments. We urge MTC/ABAG to revise the Plan and DEIR to substantively address these concerns before the documents move forward. Thank you for your consideration.

Response A6-7

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A7 Alameda County Water District

Ed Stevenson, General Manager
December 16, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A7-1

The Alameda County Water District (ACWD) wishes to thank the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) for the opportunity to comment on the Draft Plan Bay Area 2050+ Environmental Impact Report (Draft EIR).

Response A7-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A7-2

1. Section 3.6, Climate Change, Greenhouse Gases, and Energy

Sea Level Rise Projections: the Draft EIR relies on the California Ocean Protection Council (OPC) 2018 guidance and uses the OPC 2018 medium-high risk-averse choice (about 1.9 feet by 2050, and 7 feet by 2100). OPC has since released updated 2024 guidance with revised scenarios that incorporate the most current scientific understanding. ACWD suggests that the DEIR provides an explanation for the continued reliance on the OPC 2018 medium-high scenario, should that approach be maintained.

ACWD also recommends the Draft EIR reference the OPC 2024 central/intermediate scenario and consider higher-end or rapid ice-loss scenarios. Assessing adaptation strategies across a range of scenarios, including the Plan's existing 4.9-ft design envelope, would offer a more comprehensive foundation for future project decisions and help ensure that planning remains aligned with the best available science.

Response A7-2

Page 3.6-7 of the Draft EIR has been revised with the additional text to add updated information from the California Ocean Protection Council. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A7-3

2. Section 3.9, Hazards and Wildfire; Section 3.10, Hydrology and Water Quality

a. The Draft EIR notes that hazardous materials may be present in groundwater throughout the region and recognizes that construction activities, such as dewatering for land use development, transportation projects, or sea-level-rise adaptation, could encounter or mobilize contaminated groundwater. However, it does not examine how this disturbance of contamination could affect groundwater that is used for drinking water, particularly municipal wells and community systems that rely on groundwater as a primary source.

This gap is important because several Bay Area counties depend heavily on their groundwater basins for potable supply. The concern is further amplified by the scale of the proposed shoreline and sea-level-rise adaptation projects, which have the potential to shift groundwater gradients, cause mounding, or alter subsurface flow in ways that may influence contaminant migration.

Given these factors, ACWD recommends that the Draft EIR evaluate region-wide risks to groundwater quality that result from activities that will encounter and/or mobilize contaminated groundwater and propose appropriate mitigation measures.

Response A7-3

Section 3.12, "Hazards and Hazardous Materials," of the Draft EIR acknowledges that sites with documented soil and groundwater contamination are present throughout the plan area. Impact HAZ-4 discloses that construction activities associated with future land use development, sea level rise adaptation projects, and transportation projects could inadvertently accelerate the migration of contaminated groundwater or could discharge contaminated groundwater to surface waters, including groundwater sources that may be used for potable supply. Federal and State laws require that groundwater containing concentrations of contaminants above regulatory thresholds be managed and disposed of in accordance with hazardous waste requirements during excavation, transportation, and disposal. Mitigation Measure HAZ-4 in the Draft EIR requires future project proponents, where applicable, to conduct records reviews to identify existing contamination, prepare Phase I and Phase II Environmental Site Assessments for projects located on or near hazardous materials or waste sites, and consult with appropriate environmental regulatory agencies (e.g., California Department of Toxic Substances Control, regional water quality control board [RWQCB]) to minimize risks to human health and environmental resources posed by contaminated soil or groundwater. Because MTC and ABAG cannot require local implementing agencies to adopt this mitigation measure and because site-specific impacts cannot be evaluated at the program level, the Draft EIR concludes that projects implemented under the proposed plan would have the potential to create a significant hazard to the public and the environment and the impact is significant and unavoidable.

Section 3,10, "Hydrology and Water Quality," further evaluates region-wide impacts on groundwater quality. Impact HYDRO-1 discloses that construction activities associated with future land use development, sea level rise adaptation projects, and transportation projects have potential to substantially degrade groundwater quality. However, groundwater resources, including groundwater used for municipal and domestic supply, which includes drinking water, are protected through RWQCB Basin Plans, which designate beneficial uses and establish water quality objectives for surface and groundwater. Existing federal, State, and local regulations, oversight, and project-level permitting requirements would requires that protective measures are implemented during project development to prevent the violation of water quality standards. Therefore, the Draft EIR concludes that implementation of the proposed plan's forecasted development pattern, sea level rise adaptation projects, and transportation projects would have a less-than-significant impact on groundwater quality.

Accordingly, the Draft EIR adequately identifies and discloses the potential for implementation of the proposed plan to adversely affect groundwater quality, including groundwater resources used for potable water supply.

Comment A7-4

b. Page 3.9-5 of the Draft EIR states, "Asbestos is… a commercial and industrial term historically applied to a group of silica-containing minerals that form long, very thin mineral fibers (termed amphiboles), which generally form in bundles, that were once widely used in commercial products." Note that the serpentine class of asbestos (chrysotile) is not an amphibole; further, there are many crystalline amphibole minerals that are non-asbestiform. This sentence should be corrected for accuracy.

Response A7-4

Page 3.9-5 of the Draft EIR has been revised to characterize asbestos. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A7-5

c. Figure 3.10-4 of the Draft EIR provides a map of groundwater basins designated as high or medium priority. In the figure, basin boundaries are not shown, and this makes adjacent basins of the same priority appear to be combined (a single basin). ACWD recommends that basin boundaries be added to the map to avoid confusion.

Response A7-5

Figure 3.10-4 of the Draft EIR has been revised to clearly depict the boundaries of the groundwater basins to provide clarity where adjacent basins share the same priority designations. See Section 3.7, Draft EIR Section 3.10, "Hydrology and Water Quality," of the Final EIR, which provides the revised figure. This revision is informational in nature and does not change the analysis, impact determinations, or conclusions in the Final EIR.

Comment A7-6

3. Section 3.14, Public Utilities and Facilities

a. Urban Water Management Plan (UWMP) and Water Supply: ACWD recommends that the final EIR include the upcoming 2025-2030 UWMP's water supply data from regional agencies.

b. Page 3.14-3 of the Draft EIR states, "In the 2019-2020 fiscal year, [ACWD]provided water for a total of 87,323 customers." Note that ACWD provides retail water service to approximately 347,000 people; the 87,323 figure is the number of accounts (connections) ACWD services. Please correct this error in the Final EIR.

c. Similar to comment #2c above, Figure 3.14-3 of the Draft EIR provides a map of groundwater basins in the Bay Area, but basin boundaries are not shown, and this makes adjacent basins appear to be connected to each other. ACWD recommends that basin boundaries be added to the map to avoid confusion.

Response A7-6

The 2025-2030 UWMPs from regional agencies are not available at the time of preparation of the Final EIR. Therefore, the water supply data included in the EIR is based on the most current adopted UWMPs.

Page 3.14-3 of the Draft EIR has been revised of the Draft EIR has been revised to clarify ACWDs retail water service. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Please refer to Response A7-5 regarding revision to Figure 3.14-3.

Comment A7-7

4. References

a. Page 7-25:

ACWD recommends that MTC and ABAG use ACWD's final UWMP with minor edits as this version includes the final UWMP and minor edits made after the initial submission. It appears that the referenced ACWD UWMP is the final UWMP without the minor edits.

Response A7-7

The reference on page 7-25 of the Draft EIR has been revised. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A7-8

Thank you again for the opportunity to comment on the Draft EIR. For further discussions about these comments or about ACWD's water resources, please contact Laura Hidas, Director of Water Resources. We look forward to coordinating further with you on this Plan.

Response A7-8

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A8 California Department of Transportation

Cameron Oakes, Deputy District Director
December 16, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A8-1

Dear Dave Vautin:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the DEIR, Draft PBA 2050+, and associated draft supplemental reports. Caltrans remains committed to identifying and appropriately mitigating potential impacts to the State's multimodal transportation system and natural environment, in support of a safe, sustainable, equitable, integrated, and efficient transportation network.

Caltrans commends the Metropolitan Transportation Commission (MTC)/Association of Bay Area Governments (ABAG) for thoughtfully incorporating Caltrans comments and recommendations, made to the Notice of Preparation (NOP), into the DEIR and Draft PBA 2050+. We also appreciate the efforts to engage stakeholders and partners through workshops that support early and ongoing coordination.

Caltrans continues to encourage MTC/ABAG to align the Plan with the goals and objectives outlined in State Plans referenced in the NOP, including the California Transportation Plan 2050 (*link*).

The following comments are based on our review of the December 2025 DEIR, Draft PBA 2050+, and associated draft supplemental reports. Comments to the 2025 DEIR and Draft PBA 2050+ are contained in this letter, and comments to the associated draft supplemental reports are provided as an Attachment.

Response A8-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A8-2

DEIR Comments

Travel Demand Analysis

- Mitigation Measure TRA-2(a) states that MTC will collaborate with State and other agencies to explore the feasibility of new programs for reducing vehicle miles travelled (VMT), such as VMT fees, banks, and exchanges. Please note that Caltrans has funded several local/regional agencies to study the feasibility of a variety of VMT mitigation programs through the Sustainable Transportation Planning Grant program (*link*). Caltrans welcomes opportunities to work with MTC in this effort.

Response A8-2

These remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A8-3

- With respect to Transportation Element T7- Expand Freeways and Mitigate Impacts, please note that the Climate Action Plan for Transportation Infrastructure (CAPTI) guiding principles include promoting projects that do not significantly increase passenger vehicle travel (*link*). As stated in Caltrans' letter in response to the PBA 2050+ NOP (dated February 13, 2025), it is worth reiterating that State policy encourages sustainable transportation alternatives to highway capacity expansion that will reduce VMT and Greenhouse Gas (GHG) emissions.

Response A8-3

Pages 3.15-12 and 3.15-13 of the Draft EIR have been revised to address the Climate Action Plan for Transportation Infrastructure. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A8-4

Climate Change

- **Pages 3.6-30** – Regional and Local agencies: Please consider adding a resource link that highlights completed Greenhouse Gas and Climate Action Planning (CAP) studies - such as the California Air Resources Board (CARB) CAP Viewer (*link*).

Response A8-4

Page 3.6-30 of the Draft EIR has been revised with the resource link. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A8-5

Tribal Coordination

Please consider enhancing efforts to coordinate with local Tribal Nations, including opportunities for early, sustained, and government-to-government coordination with Tribes. Some improvement recommendations for consideration:

- Expand Documentation of Consultation Efforts: provide a detailed summary of outreach conducted under Assembly Bill (AB) 52, including follow-up correspondence, meeting invitations, and the status of any ongoing consultations.
- Clarify Consultation Outcomes and Influence on the Analysis: summarize input received from responding Tribes and describe how feedback informed the environmental analysis, mitigation measures, or project approach.
- Commit to Ongoing Government-to-Government Engagement: include language affirming continued coordination with Tribes throughout regional planning processes and subsequent project-level California Environmental Quality Act (CEQA) reviews, design, and construction phases.
- Enhance Mitigation Measures: strengthen Mitigation Measure CUL/TCR-4 by incorporating culturally appropriate practices, such as tribal cultural monitoring, co-developed inadvertent discovery protocols, and avoidance or preservation in place where feasible.
- Adopt a Collaborative and Respectful Tone: revise language to reflect a relationship-based approach that acknowledges Tribal sovereignty, cultural sensitivity and confidentiality, consistent with Public Resources Code (PRC) Section 21082.3(c).
- Genuine Relationship Building: establish regular communication with Tribal representatives, such as quarterly meetings to maintain trust and ensure consistent dialogue.
- Broaden Outreach Methods: make multiple outreach attempts through various communication channels – including scheduled visits to Tribal offices, follow-up calls, and invitations to coordination meetings – to ensure inclusive and good faith engagement.

Response A8-5

Discussion of tribal cultural resources and Native American coordination conducted in compliance with AB 52 is included on pages 3.7-11 through 3.7-16 of the Draft EIR. Table 3.7-2 of the Draft EIR includes a detailed summary of the outreach conducted under AB 52. As shown in Table 3.7-2, MTC sent letters to 101 Native American tribal representatives in compliance with AB 52. Only the Federated Indians of Graton Rancheria (Graton Rancheria) replied to the tribal consultation letter. As of the date of publication of this Final EIR, no tribal feedback was received. Subsequent discretionary projects may be required to prepare site-specific project-level analysis to fulfill CEQA requirements, which may include additional AB 52 consultation.

Mitigation Measure CUL/TCR-4(b) requires implementation of Mitigation Measure CUL/TCR-2 described on pages 3.7-30 through 3.7-32 of the Draft EIR. The first and second bullets of Mitigation Measure CUL/TCR-2 include tribal cultural monitoring and avoidance or preservation in place practices.

- Before construction activities, project sponsors shall retain a qualified archaeologist to conduct a record search at the appropriate information center to determine whether the project area has been previously surveyed and whether resources were identified; the record search shall include contacting the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. If a survey of the project area has not been conducted in the last 5 years, project sponsors shall retain a qualified archaeologist to conduct archaeological surveys prior to construction activities. Project sponsors shall follow recommendations identified in the survey, which may include activities such as subsurface testing, designing and implementing a Worker Environmental Awareness Program, construction monitoring by a qualified archaeologist, avoidance of sites, or preservation in place.
- Areas determined to be of cultural significance shall be monitored during the grading, excavation, trenching, and removal of existing features by a qualified archeologist and culturally affiliated California Native American tribal monitor.

The fourth and fifth bullets of Mitigation Measure CUL/TCR-2 requires that the culturally affiliated California Native American tribe to be notified and involved in determining the significance and mitigation measures of an artifact or cultural resource.

- When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource (CEQA Guidelines Section 15064.5[c][1]). If archaeological resources identified in the project area are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, and/or local register and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, culturally affiliated California Native American tribal representatives shall be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.
- If precontact archeological resources are identified through survey or discovered in the project area, the culturally affiliated California Native American tribe shall be notified. Both the archeologist and tribal monitor or tribal representative should strive for agreement on the determined significance of an artifact or cultural resource.

The comment related to genuine relationship building and broaden outreach methods does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A9 San Mateo Local Agency Formation Commission

Sarah Flamm, Management Analyst
December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A9-1

Thank you for the opportunity to comment on the Draft Plan Bay Area 2050+ and the associated Draft EIR. The Plan includes 35 strategies across the elements of transportation, housing, the economy and the environment that are intended to guide growth and deliver on regional and local priorities in the Bay Area through 2050.

The Local Agency Formation Commission (LAFCo) is a state mandated local agency established in every county to regulate the boundaries of cities and special districts. The development patterns identified in the Plan align with the goals of LAFCo to discourage urban sprawl, encourage orderly growth, and protect agricultural and open space lands. As part of this focus on reducing sprawl, San Mateo LAFCo encourages the County's 20 cities to annex the unincorporated islands that are wholly or substantially surrounded by a city and are developed or zoned for single-family homes and commercial and industrial uses. LAFCo-adopted Spheres of Influence place these unincorporated islands in the sphere of the city that can most efficiently provide municipal services. Supporting annexation of these developed areas consistent with the LAFCo-designated Sphere of Influence will vest land use authority in the agency best able to provide municipal services, remove multi-agency coordination in planning for housing, and streamline facilitating ties to transit. It should also be noted that San Mateo County's General Plan Policies encourage annexation of urban areas within city Spheres of Influence.

San Mateo LAFCo has the following comments on the Draft Plan Bay Area 2050+ and the associated Draft EIR:

Response A9-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A9-2

1) Figure 18, "Urban boundary lines across alternatives" (Draft Forecasting and Modeling Report, p. 64) shows the Urban Boundary lines in the nine Bay Area Counties. For San Mateo County, several unincorporated areas that are already urbanized and within the Spheres of Influences of cities in San Mateo County are depicted on the map as "Added Areas Only in No Project." LAFCo encourages the Plan authors to revise this figure and associated analyses (see Figure 1 below), since in San Mateo County, at least, these boundaries do not accurately depict existing urban development. As stated in Strategy EN 4: Maintain Urban Growth Boundary, "The No Project Alternative has weak enforcement of the [urban] boundary, allowing suburban growth to spill past it" (Plan Bay Area 2050+: Draft Forecasting and Modeling Report, p. 63). Figure 18 incorrectly characterizes areas in orange color in San Mateo County as "Added Areas Only in No Project," when in fact, these are existing developed and urbanized communities, some of which are wholly surrounded by one or more cities (see Figure 3). For example, Emerald Lake Hills, North Fair Oaks, and Sequoia Tract are within the Sphere of Influence of Redwood City (see Figure 4). North Fair Oaks, Harbor Industrial Area, and Unincorporated Colma, all urbanized communities, are identified as Priority Development Areas in Plan Bay Area 2050+, but are shown in Figure 19 as being areas that are added in only in the No Project scenario. LAFCo and State law expects, plans for, and encourages these unincorporated communities to eventually annex into cities identified by LAFCo. On the coast, the boundaries of the City of Half Moon Bay include the unincorporated communities of Princeton, Montara,

Moss Beach, Miramar and El Granada. These communities are within the Sphere of Influence of the City of Half Moon Bay. In Figure 2 below, LAFCo has identified various developed areas in San Mateo County that have been incorrectly identified as outside urban boundary lines.

Response A9-2

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The issue identified was a mapping error in Figure 18 "Urban Boundary Lines Across Alternatives," in the Draft Forecasting and Modeling Report and has been corrected in the updated Forecasting and Modeling report. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A9-3

2) The source for Figure 18, as listed in footnote 20, is the Urban Growth Boundary data for the San Francisco Bay Region. The source for the "Urban Growth Boundary" includes both incorporated cities, such as Pacifica, South San Francisco, Burlingame, San Mateo, Redwood City, and areas within the city's unincorporated Sphere of Influence. LAFCo recommends that the map for San Mateo County is revised to differentiate between existing incorporated cities, unincorporated areas in the Spheres of Influence of these cities, and areas outside of both incorporated cities and Spheres of Influence.

Response A9-3

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR and relates to a figure in the Draft Plan Bay Area 2050+. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A9-4

3) San Mateo LAFCo encourages MTC and ABAG to engage special districts throughout the Plan Bay Area 2050+ process. The Plan does not explicitly acknowledge the role of special districts in providing municipal services, such as water, sewer, and fire protection that are essential to the continued growth and protection of the Bay Area. In San Mateo County, municipal service providers include the County of San Mateo, 20 cities, 21 independent special districts, six subsidiary districts governed by city councils, and 33 County-governed special districts.

At least several of the Plan's strategies could be accomplished in collaboration with special districts. For example, consider EN2: Provide Means-Based Financial Support for seismic, wildfire and accessibility Home Retrofits (Draft Plan Bay Area 2050+, p. 137). The Woodside Fire Protection District is an independent special district in San Mateo County that has agreements to provide fire protection services to various local entities. In the Los Trancos County Maintenance District, property tax revenue funds a contract with Woodside Fire Protection District for enhanced fire protection services, which includes the Home Hardening and Defensible Space Fire Safety Incentive Program. This program offers property owners 50 percent reimbursement of the money they spend on preapproved wildfire prevention work, up to $7,500 per household each fiscal year.

Another strategy identified in the Plan is, H3: Allow a greater mix of housing densities and types in growth geographies (Draft Plan Bay Area 2050+, p. 131). A critical step to increasing housing density, in San Mateo County at least, is to provide public sewer service to properties utilizing private onsite septic systems. Special districts that provide sewer service can be a solution for properties located in relatively remote areas of cities, towns, and unincorporated County. For instance, San Mateo County has various special sewer districts (e.g. West Bay Sanitary District and Fair Oaks Sewer Maintenance District) that provide sewer services in the Town of Woodside, Town of Portola Valley, and unincorporated County where the local municipalities do not. Sewer service may assist jurisdictions in meeting RHNA targets.

San Mateo LAFCo looks forward to reviewing all future documents related to Plan Bay Area 2050+, and on behalf of the Commission, thank you for the opportunity to comment.

Attachments

Figure 1 - Urban Boundary Lines Map from Plan Bay Area 2050+

Figure 2 - Urban Boundary Lines Map with Mark-up of Developed Communities in San Mateo County

Figure 3 - Unincorporated Islands in San Mateo County

Figure 4 - City of Redwood City Sphere of Influence

FIGURE 1

Figure 18. Urban boundary lines across alternatives

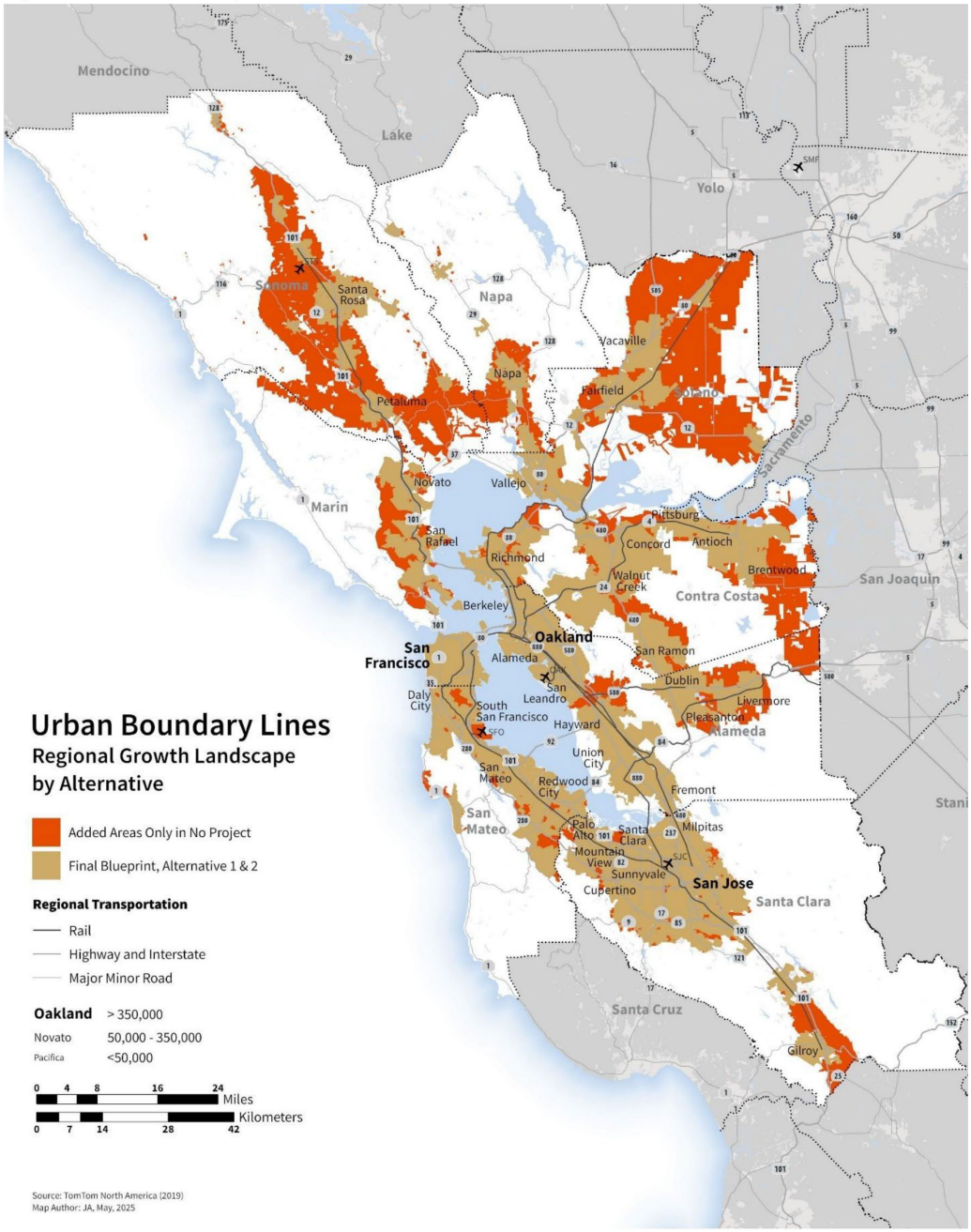
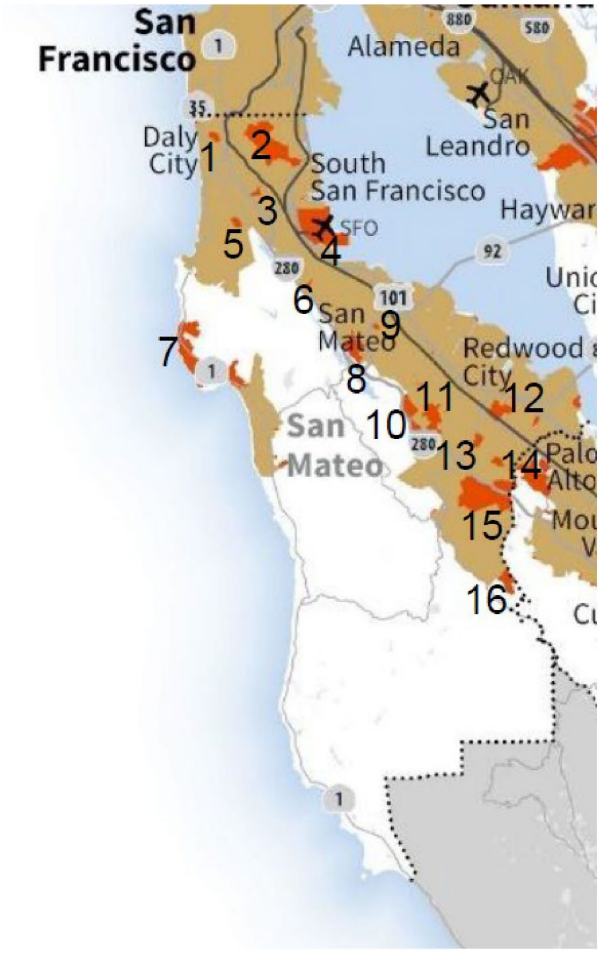


FIGURE 2

Urban Boundary Lines
Regional Growth Landscape by Alternative

Added Areas Only in No Project

Final Blueprint, Alternative 1 & 2



SAN MATEO COUNTY

KEY

1. Broadmoor
2. San Bruno Mountain Park
3. California Golf Club
4. SFO
5. SF Jail
6. Burlingame Hills
7. Montara, Moss Beach, El Granada, Princeton
8. San Mateo Highlands
9. Peninsula Golf & Country Club
10. Devonshire
11. Emerald Lake Hills
12. North Fair Oaks
13. Sequoia Tract
14. West Menlo Park
15. Stanford Lands
16. Los Trancos Woods

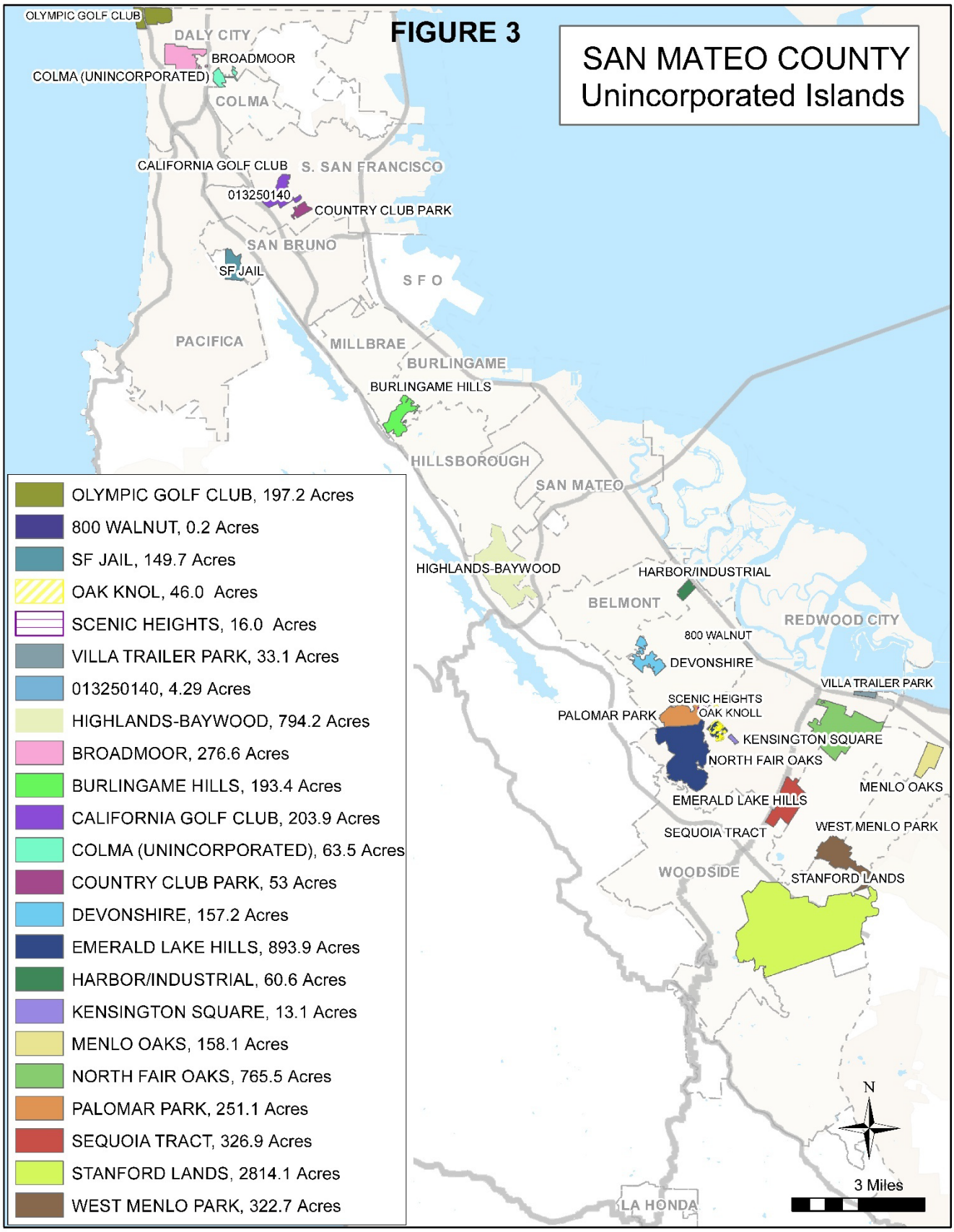


FIGURE 3
SAN MATEO COUNTY
Unincorporated Islands
OLYMPIC GOLF CLUB
DALY CITY
BROADMOOR
COLMA (UNINCORPORATED)
COLMA
CALIFORNIA GOLF CLUB
S. SAN FRANCISCO
013250140
COUNTRY CLUB PARK
SAN BRUNO
SF JAIL
S F O
PACIFICA
MILLBRAE
BURLINGAME
BURLINGAME HILLS
HILLSBOROUGH
SAN MATEO
HIGHLANDS-BAYWOOD
HARBOR/INDUSTRIAL
BELMONT
REDWOOD CITY
800 WALNUT
DEVONSHIRE
VILLA TRAILER PARK
SCENIC HEIGHTS
OAK KNOLL
PALOMAR PARK
KENSINGTON SQUARE
NORTH FAIR OAKS
MENLO OAKS
EMERALD LAKE HILLS
SEQUOIA TRACT
WEST MENLO PARK
WOODSIDE
STANFORD LANDS
LA HONDA
OLYMPIC GOLF CLUB, 197.2 Acres
800 WALNUT, 0.2 Acres
SF JAIL, 149.7 Acres
OAK KNOL, 46.0 Acres
SCENIC HEIGHTS, 16.0 Acres
VILLA TRAILER PARK, 33.1 Acres
013250140, 4.29 Acres
HIGHLANDS-BAYWOOD, 794.2 Acres
BROADMOOR, 276.6 Acres
BURLINGAME HILLS, 193.4 Acres
CALIFORNIA GOLF CLUB, 203.9 Acres
COLMA (UNINCORPORATED), 63.5 Acres
COUNTRY CLUB PARK, 53 Acres
DEVONSHIRE, 157.2 Acres
EMERALD LAKE HILLS, 893.9 Acres
HARBOR/INDUSTRIAL, 60.6 Acres
KENSINGTON SQUARE, 13.1 Acres
MENLO OAKS, 158.1 Acres
NORTH FAIR OAKS, 765.5 Acres
PALOMAR PARK, 251.1 Acres
SEQUOIA TRACT, 326.9 Acres
STANFORD LANDS, 2814.1 Acres
WEST MENLO PARK, 322.7 Acres
N
3 Miles

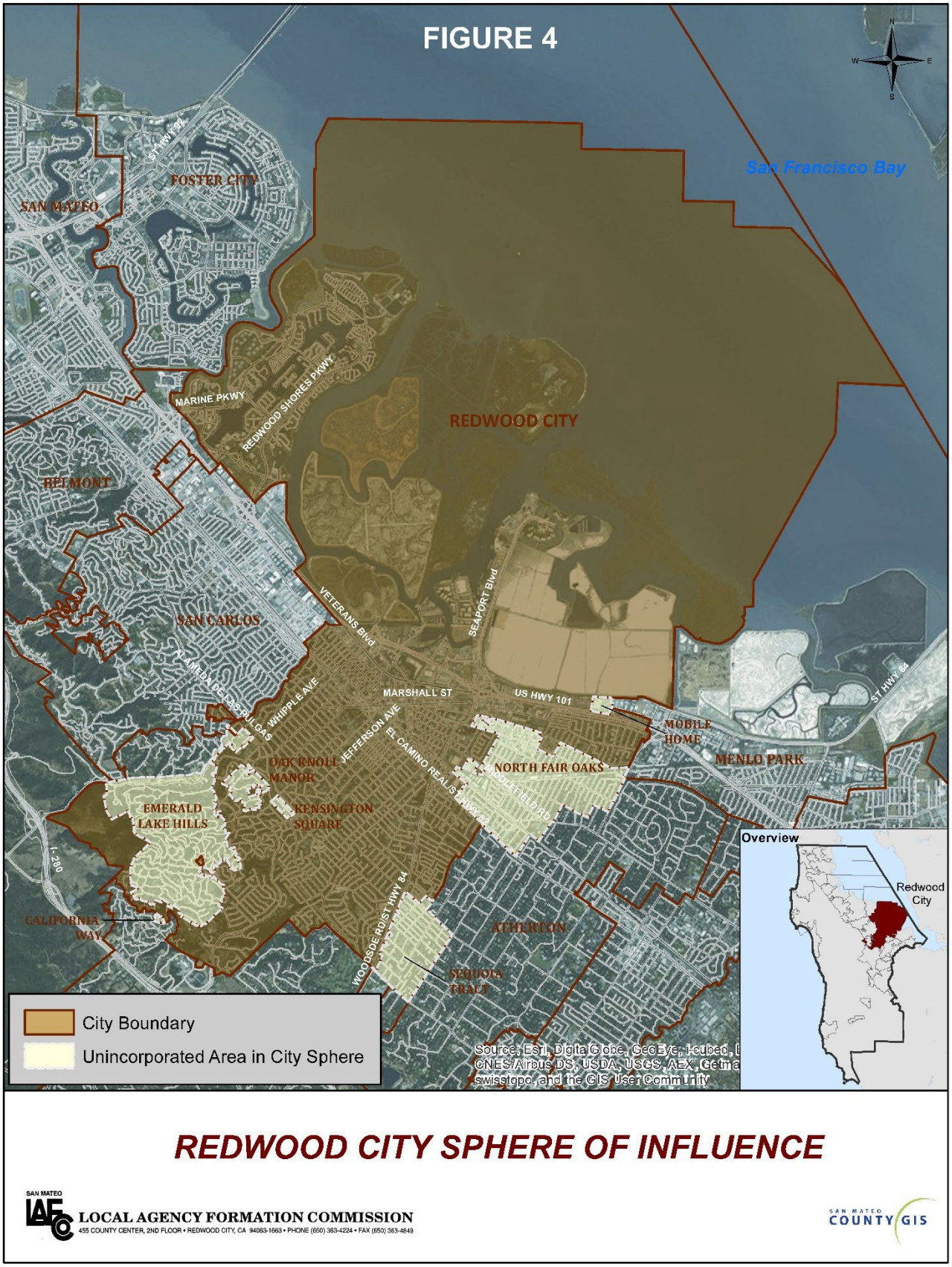


FIGURE 4
N
W
E
S
San Francisco Bay
FOSTER CITY
SAN MATEO
ST HWY 92
MARINE PKWY
REDWOOD SHORES PKWY
REDWOOD CITY
BELMONT
SAN CARLOS
VETERANS Blvd
SEAPORT Blvd
ALAMEDA DE LAS PULGAS
WHIPPLE AVE
MARSHALL ST
US HWY 101
JEFFERSON AVE
EL CAMINO REAL (ALT US HWY 82)
OAK KNOLL MANOR
NORTH FAIR OAKS
MOBILE HOME
MENLO PARK
ST HWY 84
EMERALD LAKE HILLS
KENSINGTON SQUARE
I-280
CALIFORNIA WAY
WOODSIDE RD (ST HWY 84)
ATHERTON
SEQUOIA TRACT
Overview
Redwood City
City Boundary
Unincorporated Area in City Sphere
Source: Esri, DigitalGlobe, GeoEye, i-cubed, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, swisstopo, and the GIS User Community
REDWOOD CITY SPHERE OF influence
SAN MATEO LAFCo
LOCAL AGENCY FORMATION COMMISSION
455 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1663 • PHONE (650) 363-4224 • FAX (650) 363-4849
SAN MATEO COUNTY GIS

Response A9-4

Thank you for your comment. The comment and attached figures do not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR and relate to strategies in the plan. The figures, while not included in the EIR, have been updated in the plan's Forecasting and Modeling Supplemental Report.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A10 City of Orinda

Lashun Cross, Planning Director
December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A10-1

Dear MTC and ABAG Board Members:

The City of Orinda appreciates the opportunity to review and comment on the Draft Plan Bay Area 2050+ Environmental Impact Report (DEIR). In general, the City supports the long-range regional planning effort and the collaborative framework addressing housing, the economy, transportation, and the environment. However, the City of Orinda has the following comments and concerns regarding the adequacy of the DEIR's analysis and its potential impact on the community:

Response A10-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A10-2

Growth Forecast and Population Projections

1. The Growth Forecast identified in the Draft Environmental Impact Analysis (DEIR) assumes a population growth rate of 24 percent, which is substantially higher than the 6.5 percent growth rate published by the California Department of Finance (DOF). The DEIR does not clearly describe the methodology, modeling assumptions, or data sources used to develop this forecast.

We request that the agencies provide detailed documentation and supporting analytical materials that explain the population forecasting methodology, identify all data sources, and reconcile the discrepancy between the DOF projections and the independent population projections prepared by MTC/ABAG. This reconciliation is necessary to ensure that the growth assumptions used in the DEIR are reasonable, transparent, and supported by substantial evidence.

Response A10-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth. The plan's Forecasting and Modeling Supplemental Report provides additional documentation on the forecasting methodology.

Comment A10-3
Wildfire Evacuation

2. The City of Orinda recognizes the Proposed Plan Growth Geographies and appreciates the inclusion of exceptions and exclusions for areas identified by the California Department of Forestry and Fire Protection as Very High or High Fire Hazard Severity Areas, as well as areas located within county-adopted wildland–urban interface (WUI) boundaries. However, the DEIR must be more inclusive in its analysis and provide a robust evaluation of wildfire evacuation capacity and related public safety constraints.

Increasing housing within Contra Costa County, particularly in the cities of Orinda, Moraga, and Lafayette, which presents significant evacuation, access, and emergency response limitations due to topography, roadway capacity, and wildfire risk. These constraints represent a substantial safety concern that must be fully analyzed and disclosed in the Plan Bay Area 2050+ Draft Environmental Impact Report. A comprehensive evacuation and emergency access analysis is necessary to adequately assess potential impacts and inform decision-makers and the public.

Response A10-3
Please refer to Response A6-6. The comment requests a more comprehensive analysis of evacuation and emergency asses. Please refer to Impact HAZ-6 in Section 3.9, "Hazards and Wildfire," of the Draft EIR (pages 3.9-41 through 3.9-45) and Impact TRA-4 in Section 3.15, "Transportation," of the Draft EIR (pages 3.15-31 and 3.15-32) for discussion related to evacuation and emergency access impacts from the proposed plan. The analysis in the Draft EIR is programmatic, and as a result, specific details regarding the location, size, design, location, or setting of specific projects are not known at this time. For this reason, the impact discussions in the Draft EIR are more general and focus on the Bay Area as a whole. Please see "Master Response 4: Program Level Document." As noted in the master response, the analysis in this EIR does not evaluate project-specific impacts of individual projects, although it provides environmental analysis and mitigation that is intended to address the range of impacts that may be associated with individual projects. This approach does not relieve local jurisdictions of responsibility for determining whether project-specific impacts require additional CEQA analysis. The mitigation measure would require individual projects to ensure that future development would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

Comment A10-4
TOC Policy Implementation

3. The City of Orinda has concerns regarding the DEIR's reliance on and inclusion of the Metropolitan Transportation Commission's (MTC) Transit-Oriented Communities (TOC) Policy as a component and implementation mechanism of Plan Bay Area 2050+. It is our understanding that the TOC Policy has not been formally adopted and is currently on hold until 2027 or later.

The DEIR prematurely relies on the MTC Transit-Oriented Communities Policy as an implementation measure. Because the TOC Policy has not been adopted and is subject to potential changes in its structure and evaluation framework, reliance on this policy is speculative and unsupported. As such, it does not constitute a reliable or stable basis for environmental analysis or implementation as documented in the DEIR.

Response A10-4
Please refer to Response A6-3 and "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+" for a discussion related to the TOC Policy and the proposed plan.

Comment A10-5
Alternatives Analysis

4. The DEIR identifies a total of 67 impacts across the 14 environmental topic areas analyzed. Of these impacts, approximately 52 percent are classified as "Significant and Unavoidable," often qualified by conditional language such as "if feasible." This approach obscures the extent of environmental consequences associated with the proposed plan and does not provide clear, enforceable commitments to mitigation.

In addition, the DEIR does not clearly identify or analyze meaningful Plan alternatives. One of the alternatives selected for detailed analysis has not been adopted and may be subject to change, which undermines the stability and usefulness of the alternatives analysis. As a result, the DEIR fails to provide decision-makers and the public with a reasonable range of feasible alternatives that would reduce or avoid significant environmental impacts, as required by CEQA.

Response A10-5
Please refer to "Master Response 2: Mitigation Measures" for a discussion of significant and unavoidable impacts and enforceable mitigation. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation, because details related to the location, size, design, or setting of specific projects are unknown. The EIR discloses a menu of potential mitigation measures that could be applied at the project-level to meet established performance standards; however, such measures would be the responsibility of the lead agency conducting environmental review under CEQA. As a result, there is inherent uncertainty in the degree of mitigation that would ultimately be implemented to reduce potentially significant impacts identified in the Draft EIR. Consequently, the Draft EIR acknowledges this in its post-mitigation significance conclusions (i.e., concluding that feasible mitigation may not be sufficient) and discloses that potentially significant environmental impacts may be unavoidable, where appropriate.

Please refer to "Master Response 3: Plan Alternatives" regarding alternatives chosen for analysis in the Draft EIR. The alternatives analysis in the Draft EIR complies with MTC and ABAG's obligation to consider a reasonable range of potentially feasible alternatives to foster informed decision making and public participation.

Comment A10-6
Thank you for your consideration. The City of Orinda respectfully requests that the agencies revise and expand the DEIR to address the concerns outlined above. We look forward to continued collaboration to ensure that Plan Bay Area 2050+ is implemented in a manner that is environmentally responsible, locally sensitive, and consistent with CEQA requirements.

Response A10-6
These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A11 City of Concord

Valerie Barone, City Manager
December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A11-1

Dear MTC and ABAG Board Members,

The City of Concord (City) appreciates the opportunity to comment on the Draft Plan Bay Area 2050+ (Plan) and its accompanying Draft Environmental Impact Report (Draft EIR). The City is supportive of the Plan's goals to advance a more affordable, connected, diverse, healthy, and vibrant region. However, the City has concerns that several of the policies in the Plan could actually hinder these goals. The City's comments are provided below

Response A11-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A11-2

1. The City is supportive of the Transportation Project List and the potential for increased bus service in Concord.

The City appreciates MTC's common sense "Fix It First" Policy to, first and foremost, fully fund the operation and maintenance of the region's existing transportation system. The City is also supportive of the Plan's commitment to build on this foundation with strategic investments that will create safer streets, facilitate active transportation, and expand and enhance the transit system. The City is particularly supportive of RTPID 25-T11-146, which would increase service frequency on bus lines serving the Concord BART Station. These investments are consistent with City goals to promote a well-integrated and coordinated transit network and provide easily accessible and functional alternatives to vehicular trips in Concord.

Response A11-2

The commenter expresses support for the proposed plan's transportation strategies, including the "Fix It First" approach and increased bus frequency serving the Concord Bay Area Rapid Transit (BART) Station (RTPID 25-T11-146). The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A11-3

2. Transportation Strategy T5 "Implement Pricing Strategies to Manage Demand" would have unintended consequences, including degradation of local mobility and potential safety concerns on local arterials.

The City does not support the proposal to toll all lanes on regional freeways as laid out in Transportation Strategy T5 and shown in Map 4-2. While we understand the intent to manage congestion and support climate goals, full-corridor tolling is likely to create significant unintended consequences for Concord and other East Bay communities.

Tolling every lane would certainly divert a substantial amount of traffic onto local streets as drivers attempt to avoid added costs. Concord's arterial network, already heavily used as a pass-through for

regional travel, is not designed to absorb this additional burden. Increased diversion would degrade local mobility, worsen congestion near schools and in neighborhoods, increase emissions, and create new safety concerns for people walking, biking, and driving as freeway diversion shifts high-speed, unfamiliar traffic onto Concord's local streets, increasing conflicts at intersections and crossings and creating new safety risks in areas that are not designed to accommodate freeway-level traffic volumes or behaviors.

We encourage Plan Bay Area 2050+ to pursue strategies that reduce congestion without shifting impacts onto local jurisdictions. Alternatives such as limited express lanes, improved transit frequency and reliability, targeted interchange improvements, and incentives for mode shift can achieve regional goals without compromising the quality of life in affected communities.

Further, the implementation of congestion pricing is considered to be a regressive tax disproportionately affecting lower-income individuals. Lower income wage earners often live further from the job centers and may have fewer public transit options or need their vehicle for their job. To place an additional tax on lower-income individuals and increase the cost of doing business will make it increasingly difficult for people to stay in the Bay Area and could lead to displacement even further from job centers; thereby having the opposite effect of achieving the regional goals of reducing congestion and climate-related impacts.

Lastly, there will likely be economic development impacts that could deter future investment in the region due to the rising cost of doing business in the Bay Area. Inflation has reached unprecedented levels, driving up the costs of food, energy, insurance, and other goods, while tariffs have further contributed to price increases. This added burden on businesses may prompt some to relocate outside the region and discourage new businesses from establishing themselves in the Bay Area.

The City urges MTC/ABAG to reconsider any measure that would toll all freeway lanes and risk substantial diversion onto local streets, disproportionately tax lower-income individuals, and result in economic impacts to the region.

Response A11-3

Transportation Strategy T5 is intended to support regional goals related to congestion management, greenhouse gas reduction, and system performance. As described in the proposed plan, the concept of regionwide pricing strategies (including potential highway tolling approaches) is a long-range implementation concept and would require substantial additional study, policy development, and separate future actions by responsible agencies and governing bodies prior to implementation.

Any future pricing program would be expected to consider corridor-level performance, potential diversion effects, equity outcomes, and reinvestment strategies, including mitigation and affordability mechanisms for lower-income travelers. The proposed plan also identifies complementary strategies to reduce driving demand and support mobility (e.g., transit frequency and reliability improvements, transit network integration, and multimodal investments), which would be expected to play an important role alongside any pricing tools.

The Draft EIR evaluates the proposed plan and alternatives at a programmatic level. Please refer to "Master Response 4: Program Level Document" regarding the level of analysis prepared for the Draft EIR. Because the proposed pricing approaches are conceptual and not defined as specific implementable projects at this time, the Draft EIR does not include corridor-level diversion modeling or intersection-level safety analysis for specific local arterials. Such analysis would occur, as appropriate, through subsequent planning and project development processes when a specific pricing program is proposed.

In response to the City of Concord's concern regarding Transportation Strategy T5 having unintended consequences, including degradation of local mobility, as noted in the Section 3.15, "Transportation" of

the Draft EIR, SB 743 requires CEQA transportation analysis to focus on vehicle miles traveled (VMT), not congestion or delay, and therefore CEQA does not evaluate potential changes in traffic diversion, intersection operations, or local congestion as environmental impacts. The Draft EIR evaluates Strategy T5 based on its effect on regional VMT and associated greenhouse gas emissions, consistent with SB 743 and CEQA Guidelines Section 15064.3.

In regard to potential safety concerns on local arterials, please refer to the analysis under Impact TRA-3 of the Draft EIR, which discusses the Regional Safety/Vision Zero and Complete Streets policies of the plan. The proposed plan includes proposed investments directed toward designs and enforcement efforts that would improve safety on the roads (Strategy T10) and investments for an expanded Complete Streets network (Strategy T9). These investments would go to local jurisdictions committing to projects that install design elements that lower driving speeds or implement road diets and to projects that make biking and walking safer. The proposed plan is not expected to adversely affect the design of transportation facilities. Rather, investments are expected to incentivize design improvements to make roadways safer.

Comment A11-4

3. Housing Strategy H5 "Integrate Affordable Housing into All Major Housing Projects" may not be feasible or effective for all jurisdictions, especially relatively more affordable jurisdictions like Concord, given economic conditions.

Strategy H5 calls for a baseline of 10% to 20% of new market-rate housing developments of five or more units to be affordable to low-income households. Requiring an inclusionary percentage of at least 10% across the board is a one size fits all approach that is not appropriately nuanced to the economic realities of the Bay Area's diverse communities.

Concord's current rental inclusionary percentage of 6% (split between 1% very low-income, 1% low-income, and 4% moderate-income) is based on a feasibility study that recommended this breakdown based on economic data. The study analyzed the City's previous inclusionary policy that required 10% of units to be affordable to low-income households and found this policy to be infeasible due to the significant subsidies required at the very low- and low-income levels. Strategy H5 of the Plan therefore calls for a policy that has been found to be unworkable in Concord and would have the opposite effect of the intended goal of increasing the supply of affordable housing by making housing development economically infeasible.

The City urges MTC/ABAG to rework strategy H5 to adopt a more tailored approach that reflects the diverse needs of the Bay Area's 109 jurisdictions, and has the following suggested language:

> *Encourage a baseline of 10% to 20% of new market-rate housing developments of five units or more to be affordable to lower- and moderate-income households, or at a percentage and affordability level as supported by feasibility studies and local priorities*.

Response A11-4

Plan Bay Area 2050+ is a long-range regional plan that identifies strategies intended to advance regional goals, including increasing housing supply and affordability, and to support compliance with State requirements, including the obligation to plan for housing for all economic segments of the population.. Housing Strategy H5 is intended to encourage inclusion of affordable units in market-rate developments as one tool to support production of housing affordable to a range of income levels. The proposed plan does not itself adopt local inclusionary requirements or override local land use authority. Local jurisdictions retain discretion regarding housing policy design, including the use of feasibility studies and other local analyses to inform inclusionary requirements and implementation approaches.

The Draft EIR evaluates the proposed plan's strategies at a programmatic level and does not evaluate the economic feasibility of specific local inclusionary ordinances. Please refer to "Master Response 4: Program Level Document." Implementation of housing policies would occur through subsequent actions by jurisdictions and other responsible agencies.

Comment A11-5

4. The Draft Plan and associated Draft EIR assume a mix of federal, state, regional, and local sources of revenue to fund Plan strategies and mitigation measures but the region is facing funding constraints and unprecedented funding uncertainty at the federal level.

The City understands the role of the Plan as a long-range, aspirational vision. The Plan itself acknowledges that its strategies are bold and will require significant funding. While the City understands that the Plan is not meant to be a financial programming document, there seems to be a disconnect regarding how these strategies will ultimately be funded. Even though transportation federal law requires a fiscally constrained approach that is meant to include only reasonably anticipated transportation revenues, the Plan includes revenues from an anticipated regional revenue measure that the passage of Senate Bill (SB) 63 enables but is far from certain. Similarly, any regional housing bond will need to overcome many obstacles, especially when affordability is such a big concern to voters. The Plan outlines major regional initiatives when no funding has been secured. While the Plan is meant to be ambitious, the City feels compelled to voice concerns about the level of investment needed to achieve strategies and urges MTC/ABAG to think about which strategies to prioritize, phase, scale back, or abandon given the current economic environment.

Moreover, the Draft EIR assumes that local governments, school districts, utilities, and special districts will fund and deliver many of the improvements needed to mitigate the Plan's environmental impacts related to fire and police protection, school facilities, solid waste, water supply reliability, wastewater and stormwater capacity, flood protection, and evacuation performance. These are expected to be addressed using local agency resources, developer impact fees, and/or utility rates with no secured regional, state, or federal funding. Recent State legislation, including SB 937 (fee deferral) and Assembly Bill 602 (fee constraints), makes development impact fee sources increasingly uncertain and inconsistent with the Plan's assumptions. These gaps create substantial unfunded liabilities for local jurisdictions. Many impacts remain significant and unavoidable (SU) not because mitigation is infeasible, but because no reliable funding mechanism has been established to carry it out. The Alternatives section should address this concern and evaluate a phased or reduced-scale alternative to account for funding uncertainties. Section 4.3 of the Draft EIR identified a "Lower Federal Transportation Funding Alternative" as an alternative that was considered but not evaluated with the reasoning that the Plan is already fiscally constrained. The City disagrees with this analysis given that the Plan appears to include revenue from a regional transportation measure that requires passage of a highly uncertain sales tax.

Response A11-5

The proposed plan identifies planning-level investment needs and potential funding pathways using a mix of federal, state, regional, and local revenue sources, including both existing revenues and potential future revenues that would require separate actions by responsible agencies and/or voter approval. The proposed plan does not impose taxes, does not approve ballot measures, and does not allocate funding responsibilities to local agencies. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," which addresses (1) the planning-level nature of plan investment estimates, (2) uncertainty associated with future funding sources (including federal, state, and regional discretionary funding and potential future revenue measures), and (3) how Plan Bay Area is updated periodically to reflect evolving fiscal conditions.

With respect to mitigation funding, please refer to "Master Response 2: EIR Mitigation Measures," which addresses the Draft EIR's program-level mitigation framework, including the role of responsible agencies

and the basis for findings of significant and unavoidable impacts where impacts remain significant after feasible mitigation is incorporated at the program level.

With respect to alternatives, please refer to "Master Response 3: Plan Alternatives." As discussed therein, CEQA requires EIRs to evaluate a reasonable range of alternatives that could feasibly attain most of the basic project objectives while avoiding or substantially lessening significant environmental impacts. In recognition of the nearly endless range of potential variations, CEQA does not require an agency to analyze every conceivable alternative. The alternatives evaluated in the Draft EIR each would accommodate the same regionally forecasted level of growth and allow for comparison of environmental outcomes associated with different growth patterns and strategy packages, consistent with statutory and analytical requirements for a programmatic EIR.

Comment A11-6

5. The Draft EIR appears to contain incorrect job projection information for Contra Costa County in Table 2-1.

Table 2-1 indicates that Contra Costa County will experience negative job growth from 2020 to 2050, with 127,300 jobs in the base year and only 126,300 in 2050. These numbers do not align with the numbers found in the Plan, nor are they based in reality for one of the region's biggest counties. The Plan Bay Area 2050+ Contra Costa County Factsheet reports the number of jobs in Contra Costa County will increase by about 27%, from 414,000 to 526,000. Please correct this discrepancy and verify that the impacts of job growth in Contra Costa County have been adequately evaluated in the Draft EIR.

The City appreciates the opportunity to comment. Thank you for your consideration.

Response A11-6

Page 2-14 of the Draft EIR has been revised with updated growth projections in Contra Costa County. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A12 City of Foster City

Sofia Mangalam, Director of Community Development Department
December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A12-1

Dear MTC and ABAG Boards,

On behalf of the City of Foster City, we submit the following comments regarding the Plan Bay Area 2050+ ("Plan") Draft Environmental Impact Report ("DEIR"). We appreciate the regional significance of Plan Bay Area and the effort that goes into preparing the RTP/SCS and the DEIR and have the following clarification comments and questions.

Response A12-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A12-2

I. Transportation and Analysis

The City of Foster City agrees with many of the Transportation Strategies in the Plan and those analyzed in the DEIR. The vision of a more connected, equitable, and resilient Bay Area is critically important, and many of the Plan's goals align with our city's transportation priorities. As a small city without rail stations and with limited transit options, Foster City faces unique challenges in accessing the benefits envisioned by regional strategies. These include expanded transit access, reduced single-occupancy vehicle dependency, and improved mobility for residents and workers.

We urge the agencies to strengthen consideration of, and support for, future fundings opportunities as well as advisory and/or technical support/assistance for Foster City and other similar jurisdictions. Many major goals and strategies identified and analyzed in the DEIR are valuable and as the City of Foster City is one of the few cities without rail stations, we hope the plan considers ways to address public transit to improve and enhance connectivity and make that a reality within our city and other jurisdictions like ours. Clarifications and additional impact analysis is requested for the areas below:

Response A12-2

Implementation-related comments will be considered as the plan is refined and implemented, including through future funding and technical assistance programs.

Please see “Master Response 7: Regional Coordination, Partnerships, and Local Implementation.”

The Draft EIR evaluates transportation effects at a program level, and more detailed evaluation of specific transit improvements or localized circulation effects would occur through subsequent planning and project-level review, as applicable Please refer to “Master Response 4: Program Level Document” or a discussion regarding program level analysis.

Comment A12-3

A. Given the increase in regional highway traffic over the last several years, the congestion has backed onto the City's roadways and traffic has been impacted considerably. Foster City also would encourage opportunities for more specific transportation analysis, including cut-through traffic that could affect our City.

B. Express Lanes. The Draft Plan and related planning work contemplate express lanes and other pricing strategies as tools to manage congestion. While such tools may offer benefits regionally, more information is needed on their effectiveness, equity implications, and applicability for smaller jurisdictions. We are particularly interested in data and case studies on express lanes as a congestion management solution and how express lanes might integrate with local congestion goals as a viable solution for congestion management.

C. Active Transportation and Impacts. Furthermore, while the DEIR and Plan noted goals and other complimentary plans such as the MTC's Regional Active Transportation Plan (updated 2023) which calls for increased use of active transportation modes including scooters and bikes. However, with the raising usage of e-scooters and e-bikes (individual or through ridesharing programs), additional impact analysis of these active modes on local transportation networks should be examined should that active mode of transportation continues to be encouraged.

Response A12-3

The Draft EIR evaluates transportation effects at a program level, including regional travel patterns and systemwide performance. As a program-level document, the Draft EIR does not provide intersection-level or neighborhood-level circulation analysis for individual jurisdictions, including detailed analysis of

localized cut-through traffic conditions. More detailed operational analysis of local roadway conditions would occur through subsequent transportation planning and project development processes led by the responsible agencies. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis.

Similarly, express lanes, congestion pricing strategies, and active transportation initiatives are evaluated in the Draft EIR at a programmatic level. The specific design features of these strategies—including equity provisions, pricing structures, eligibility criteria, and localized operational impacts—would be determined through future Commission actions and implementing agency decisions and could be subject to project-level review as applicable. MTC has previously considered equity approaches in pricing strategies, including affordability measures such as toll discounts, credits, or caps for lower-income households and incentives for higher-occupancy vehicles, to help reduce disproportionate burdens and support equitable implementation. Please refer to Response A11-3 for a discussion regarding regionwide pricing strategies.

Comment A12-4

II. Housing Strategies and Analysis

The City of Foster City is a 4 square-mile city that is largely built out. Currently, there are few vacant residential land that can accommodate additional opportunities for residential development. Clarifications and additional impact analysis is requested for the areas below:

A. Infrastructure Capacity. A few Housing Strategies encouraging more housing types do not take into consideration availability of adequate infrastructure such as water, sewer, streets, school capacity, and other local constraints that a City like Foster City faces or any other 'built-out' city faces to support housing growth. Smaller cities often face significant constraints such as limited staffing, fewer developments in the pipeline, lack of transit-oriented sites, and infrastructure limitations that affect feasibility. Achieving the Plan's housing strategies may not be practical without targeted assistance. Similar to transportation comments above, we urge the agencies to strengthen its considerations and support for future fundings opportunities and advisory and/or technical support for our and other similar jurisdictions.

Response A12-4

Plan Bay Area 2050+ is a long-range regional plan that identifies strategies intended to support housing production and affordability across the Bay Area. The proposed plan does not override local land use authority or require cities to approve specific development projects. Implementation of housing strategies would occur through subsequent actions by local jurisdictions and other responsible agencies, consistent with local planning processes and applicable state law. See "Master Response 7: Regional Coordination, Partnerships, and Local Implementation."

The Draft EIR evaluates the proposed plan at a programmatic level and does not include parcel-level infrastructure capacity analyses for individual jurisdictions. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. Provision of public infrastructure and services—including water supply, wastewater, stormwater, streets, and schools—remains the responsibility of the appropriate local agencies and service providers with authority over planning, financing, and implementation. Future development proposals would continue to be subject to applicable requirements, including assessment of infrastructure and service capacity and project-level CEQA review where required.

The commenter's request for additional coordination, technical assistance, and funding support for built-out and resource-constrained jurisdictions is noted. Please refer to "Master Response 7: Regional

Coordination, Partnerships, and Local Implementation," which addresses the plan's implementation approach and the importance of coordination between MTC, ABAG, and local jurisdictions.

Comment A12-5

B. Projections. Chapter 3.1.3 of the DEIR notes that a combination of data from 2023, 2020, and 2005 was used as baseline data for certain resource areas when 2025 data is not available. An example is Land Use and Population resource area where the growth used a base year of 2020. However, with the updated data pertaining to Housing Element updates in all different cities in California, would that lend more useful projection and Information rather than the census decennial 2020 data? Furthermore, the population projection in 2050 seems higher than those published in other agencies, such as the California Department of Finance (DOF). Does that have to do with baseline data and method starting at 2020? We request additional Information to further explain why the choice to use this baseline data and methodology and if changed, would it result in substantive differences in impact level that would then change alternative growth scenarios. Furthermore, please clarify if obligations listed in Table 1.1 of the EIR plays into methodologies chosen for projections throughout this analysis, in particular, the population and land use assumption?

Response A12-5

As discussed in Section 1.6.1, "Baseline Assumptions," of the Draft EIR the document relies on a consistent set of baseline conditions and forecasting assumptions appropriate for program-level CEQA analysis of a regional plan. Analysis in the EIR generally assumes 2025 as the base year (existing conditions). However, baseline years vary by resource topic depending on data availability and the most recent complete datasets available at the time of analysis. For example, the analyses of air quality in Section 3.4, "Air Quality"; GHG emissions and energy in Section 3.6, "Climate Change, Greenhouse Gases, and Energy"; noise in Section 3.12, "Noise"; and transportation in Section 3.15, "Transportation," use data from 2023 consistent with the assumptions for land use and traffic volumes in Travel Model 1.6. Section 3.11, "Land Use, Population, and Housing" of the Draft EIR uses 2020 data consistent with the most recent population information and plan's growth forecast. 2020 Census-based information is used as a primary dataset because it provides a consistent regionwide baseline for demographic and household characteristics and aligns with common demographic analysis practices.

With respect to Housing Element updates, Housing Elements reflect jurisdiction-level policy and zoning capacity over a defined planning period and are not equivalent to regionwide long-range population and employment forecasts. However, local planning information is considered as part of plan development and ongoing collaboration with jurisdictions.

The Draft EIR evaluates the proposed plan and alternatives using the same forecasting framework to support comparative analysis across alternatives. Please refer to "Master Response 3: Plan Alternatives." The Draft EIR is intended to evaluate how different growth patterns and strategy packages affect environmental outcomes, not to predict the precise level of future growth that may occur. Accordingly, changes to baseline data year selection would not necessarily result in substantive changes to the comparative impact conclusions across alternatives, as the analysis relies on consistent assumptions and methodologies across scenarios.

The obligations listed in Table 1.1 reflect applicable statutory and regulatory requirements guiding preparation of the proposed plan and Draft EIR, including requirements for preparation of an RTP/SCS. These requirements inform the overall planning and analytical framework but do not establish predetermined forecast outcomes. Please refer to "Master Response 1: Regional Growth Forecast" for further discussion of forecasting methods and differences between Plan Bay Area 2050+ projections and projections prepared for other purposes (e.g., DOF).

Comment A12-6

C. RHNA. Overall, while the EIR states that that this is the fourth RTP/SCS for the Bay Area and is a limited and focused update to Plan Bay Area 2050 and does not accompany a RHNA cycle, we request the agency to provide more information and clarifications if any assumptions in this DEIR and Plan would affect future RHNA methodologies.

D. Jobs-Housing. Many strategies analyzed are dependent on typical land use and travel patterns. With the continuous changes to the employment patterns such as work-from home that could increase employment center vacancies, it is encouraged that future planning and analysis account and evaluate the jobs/housing balance and its impacts to the region.

Response A12-6

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast" for a discussion regarding the relationship between the regional growth forecast and RHNA process. With respect to remote work and evolving employment trends, MTC and ABAG acknowledge that remote work patterns and longer-term productivity and labor market shifts continue to evolve and remain uncertain. These trends will continue to be monitored and considered as part of future plan updates.

Comment A12-7

III. Environmental Strategy and Analysis – Sea Level Rise

Foster City covers approximately 20 sq. miles, of which 4 sq. miles include existing land and reclaimed marshland. The City faces several challenges to overall community safety, including seismic hazards, sea level rise, flooding (including dam inundation), climate change (extreme heat, drought), urban fires, and hazardous materials release. Many of the Environmental Strategies align with the City's adopted Climate Action Plan 2024. The City encourages multi-agency collaborations on efforts pertaining to addressing climate change, particular sea level rises. Clarifications and additional impact analysis is requested for one area below:

A. City's Levee Project. A few Pages 2-15 thru 2-17 of the DEIR discuss Sea Level Rise Adaptation Projects and states, "The footprint of sea level rise adaptation projects were spatially analyzed using known or approximate site plans for and the preliminary design information for individual projects. The proposed plan's sea level rise adaptation projects footprint was developed from the proposed sea level rise adaptation projects." Foster City completed its $95 million Levee Project in 2024 to address sea level rise. Clarify if this has been accounted for and included as part of the projection and footprint in Figure 2-3.
https://planbayarea.org/sites/default/files/meetings/attachments/6184/9aviii_24_1550_Attachment_G_Resilience_Project_List.pdf

Response A12-7

The City of Foster City's recently completed levee project was not included in the Draft EIR's sea level rise adaptation projects footprint because it was completed in 2024. The Foster City Levee Protection Planning and Improvements Project is in the Shoreline Adaptation Project Map (SAPMap), but was filtered out during the analysis to create the Resilience Project list due to its completed status. The sea level rise adaptation project list focuses on potential future adaptation actions that may be implemented to support the proposed plan's strategy to protect shoreline communities affected by sea level rise (EN1, "Adapt to Sea Level Rise"). Specifically, the project list includes regionally identified shoreline adaptation projects from the Shoreline Adaptation Project Map (MTC/ABAG and BCDC 2025) that have not yet been completed. In addition, the project list includes local shoreline adaptation projects and early project

concepts identified in local plans and based on input from local jurisdiction staff (MTC and ABAG 2024). The project list focuses on projects that adapt vulnerable shorelines from up to 4.9 feet of inundation (MTC and ABAG 2024).

The purpose of the sea level rise adaptation project analysis is to provide a programmatic, regional evaluation of potential environmental impacts associated with implementing Strategy EN1, rather than provide an analysis of individual completed projects. Please refer to "Master Response 4: Plan Level Document." The exclusion of this levee project from the sea level rise adaptation project list does not preclude the City of Foster City from using the Draft EIR for future CEQA streamlining or affect the adequacy of the Draft EIR analysis or its conclusions regarding the environmental impacts associated with implementation of the proposed plan.

Comment A12-8

Thank you for your consideration. Please direct any questions pertaining to the comments in this letter to Thai-Chau Le, Planning Manager for Planning/Code Enforcement Division at Community Development Department, at t le@fostercity.org or 650-286-3244.

Response A12-8

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A13 San Francisco Bay Conservation and Development Commission

Lisa Herron, Principal Waterfront Planner
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A13-1

Dear MTC Public Information Office:

Thank you for the opportunity to comment on Plan Bay Area 2050+ Draft Implementation Plan Report and Draft Environmental Impact Report (DEIR) for Plan Bay Area 2050+.

The San Francisco Bay Conservation and Development Commission (BCDC) is providing the following comments as a responsible agency with review authority over projects that may be informed and result from the plans and strategies highlighted in this programmatic EIR. BCDC relies on Plan Bay Area 2050+ Implementation Report and EIR for regional planning and coordination purposes, and we appreciate this opportunity to comment on both documents. The comments provided below are related to BCDC's plans, laws and policies including: the McAteer-Petris Act (Title 7.2 of the California Government Code), the Suisun Marsh Preservation Act (SMPA) (Public Resources Code Section 29000 et seq.), and the Suisun Marsh Protection Plan (SMPP), and the *San Francisco Bay Plan* (Bay Plan), as well as other advisory regional adaptation resources published by the agency, including Bay Adapt: Regional Strategy for a Rising Bay and the Regional Shoreline Adaptation Plan.

First and foremost, BCDC staff want to acknowledge and thank MTC and ABAG for their continued leadership and partnership in advancing climate adaptation efforts and coordinated regional planning across the region. As the region's comprehensive land use, transportation, and environmental plan, Plan Bay Area provides an essential roadmap for how the Bay Area confronts the key issues of our time. By

centering climate change, equity, and environmental protection – alongside housing, transportation and the economy-- the Plan provides a balanced and thoughtful framework for regional action.

Potential impacts from sea level rise and flooding would cause immense damage to the Bay Area's communities, critical infrastructure, transportation network and natural areas. Therefore, BCDC appreciates and strongly supports the inclusion of sea level rise adaptation as a core component of Plan Bay Area 2050+. Over the past several years, BCDC staff have worked closely with MTC and ABAG staff to provide technical and policy coordination on this topic area. Through the SLR Funding and Investment Framework, published in 2023, our agencies collaborated to map out the costs to adapt to mid-century flooding and sea level rise across the region. The nearly $100B price tag, while significant, pales in comparison to the cost of inaction, estimated (and, as Chair Wasserman has noted, likely undervalued) at $230B. This research helped form the basis for the PBA 2050+ Resilience Project List—the first time a comprehensive set of adaptation projects has been incorporated into the Plan. Embedding this list within Plan Bay Area 2050+ represents a significant step toward aligning regional planning, investment strategies, and long-term climate resilience, and we commend MTC/ABAG for advancing this essential work. Likewise, as BCDC adopted the first Regional Shoreline Adaptation Plan in late 2024, our agency staff worked closely together to align it with Plan Bay Area 2050's goals, growth geographies, land use policy, and data sources. Finally, the revised Priority Conservation Area program is poised to provide critical support and funding to preserve and adapt the region's natural areas.

We appreciate MTC/ABAG's commitment to integrating sea level rise adaptation into their planning and look forward to continuing our close coordination on the development and implementation of regional policies that support equitable and effective resilience strategies.

The remainder of this letter is organized in two parts: first, comments on specific actions in the Draft Implementation Plan Report; and second, comments on the DEIR that focus primarily on ensuring consistent definitions and appropriate categorization of BCDC's legal authorities, policies, and regulatory programs throughout the environmental analysis.

Response A13-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A13-2

Draft Implementation Plan Report

Thank you for the opportunity to comment on Plan Bay Area 2050+ Draft Implementation Plan Report and Draft Environmental Impact Report (DEIR) for Plan Bay Area 2050+.

BCDC appreciates the inclusion of the following Draft Implementation Plan actions (45, 46, 58, 63) and looks forward to partnering on their implementation. In addition, we offer minor suggestions to bullets in actions 49, 50, 52, and 53 to strengthen them.

49 - Expand planning, funding and project delivery technical assistance for sea level rise adaptation

- "Coordinate with partners to deliver more streamlined and unified sea level rise technical assistance, making it easier to identify and track available opportunities"
    - **Comment:** As cities and counties around the Bay develop subregional shoreline adaptation plans that address sea level rise – as now required by state law under SB 272 – it is more important than ever to provide high-quality and coordinated technical assistance to support local governments, special districts, communities, and project proponents. The RSAP also requires the inclusion of proposed land use changes alongside shoreline adaptation projects.

This action could be improved by stating that the agencies will work together to provide land use policy guidance to support meeting SB 272 / RSAP requirements, alongside other planning requirements for local jurisdictions (i.e. RHNA, Housing Elements, Local Hazard Mitigation Plans, etc.).

50 - Support BCDC in advancing efforts to strategically plan for and fund climate adaptation.

- "Leverage findings from the Sea Level Rise Adaptation Funding and Investment Strategy to inform how sea level rise is addressed in Plan Bay Area 2060"

    - **Comment**: This statement would be strengthened by stating that the findings from the Investment Strategy will be considered for integration throughout MTC/ABAG's programs, in addition to PBA 2060.

52 - Pilot methods to accelerate conservation and transportation project delivery.

- **Comment**: This action could be improved through balancing conservation actions with transportation connectivity actions. BCDC recommends adding implementation measures that ensure conserved lands and restored shorelines are accessible via public transit, regional trails, and safe active transportation routes. Without this transportation component, the strategy may preserve open space without achieving the intended overarching strategy, which is expanding access to parks and open space.

53 - Help local governments advance conservation, trails integration and green infrastructure

- "Offer technical support and resources to assist Open Space and Conservation General Plan Element updates, advance the Bay Trail and promote trails in developed areas."

    - **Comment**: BCDC encourages a comprehensive approach to trail planning that reflects Bay's diverse shoreline character, including restoration sites, semi-rural areas, and rural shorelines alongside developed areas. This approach would better reflect the Bay's varied landscape and create richer opportunities for public access.

- "Create and disseminate best practice guidance and standard operating procedures for integrating the Bay Trail, Bay Area Water Trail, Regional Trails and the Active Transportation Network into subregional Shoreline Adaptation Plans and climate change resilience projects."

    - **Comment**: BCDC appreciates the inclusion of the Bay Area Water Trail alongside land trail systems in this action. However, we note this is the Water Trail's only appearance in the Implementation Plan. The Water Trail serves a distinct function: providing water-based public access that allows users of non-motorized small boats to experience the Bay's historic, scenic, cultural, and environmental resources. In addition, the Water Trail's design guidelines promote safe, responsible Bay use while protecting and enhancing appreciation of environmental resources through education and strategic planning, aligning with the overall strategy of this action. Given these unique characteristics and the importance of maintaining water-oriented recreation and public access as the shoreline adapts to sea level rise, we recommend establishing a separate implementation action for the Water Trail that includes technical assistance for local governments, dissemination of design guidelines, and coordination with shoreline adaptation planning to ensure water access points remain viable and appropriately sited.

Response A13-2

Thank you for your comment. This comment provides comments on the actions in the proposed plan. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. MTC staff have reviewed the comment and made revisions to the Final Plan Bay Area 2050+ Implementation Plan where appropriate, and will continue to coordinate with BCDC staff to discuss the feedback.

Comment A13-3

Draft Environmental Impact Report: Environmental Analyses

BCDC staff's remaining DEIR comments address inconsistencies in the definitions and regulatory categorization of BCDC's legal authorities, policies, and plans throughout the document. Below, we provide accurate and up-to-date definitions organized by regulatory category, State Regulations, Regional Regulations, and Specific/Master Plans, for consistent use throughout the DEIR. Following these definitions, we offer section-specific recommendations for strengthening references to BCDC policies.

Under “State Regulations”:

A. San Francisco Bay Conservation and Development Commission: BCDC is a State planning and regulatory agency with permitting authority over San Francisco Bay, the Bay shoreline, and Suisun Marsh, as established in the McAteer-Petris Act, the Suisun Marsh Preservation Act and the Federal Coastal Zone Management Act.

B. McAteer-Petris Act: The McAteer-Petris Act, passed in 1965, is the California state law that created BCDC and established its regulatory authority over San Francisco Bay (Codified in California Government Code Sections 66600-66661). It grants BCDC the authority to grant or deny permits for any proposed fill; extraction of materials; or substantial changes in use of any water, land, or structure within the Commission’s jurisdiction (Government Code Section 66632). Additionally, BCDC establishes land use policies for the Bay as a resource and for development of the Bay and shoreline in the Bay Plan, which provides the basis for the Commission’s review and actions on proposed projects.

C. **Nejedly-Bagley-Z'berg Suisun Marsh Preservation Act:** enacted in 1974 to require BCDC and the California Department of Fish and Wildlife to prepare a plan to preserve the integrity and ensure continued wildlife use of the Suisun Marsh. The Suisun Marsh comprises approximately 85,000 acres of tidal marsh, managed wetlands, and waterways in southern Solano County. It is the largest remaining brackish wetland complex in San Francisco Bay, representing more than 10% of California's remaining wetland area, and is recognized as a wildlife habitat of international importance.

The Marsh Act incorporated the findings and policies of the SMPP into State law and empowered BCDC to implement the SMPP through its regulatory authority. The SMPP establishes: (1) a Primary Management Area encompassing approximately 89,000 acres of tidal marsh, managed wetlands, adjacent grasslands, and waterways where BCDC has authority to issue Marsh Development Permits; and (2) a Secondary Management Area of approximately 22,500 acres of buffer lands where Solano County retains permitting jurisdiction and BCDC has some appellate authority. Under the SMPP, certain local entities are responsible for preparing and administering a local protection program, while BCDC serves as the land use permitting agency for development in the Primary Management Area and has review authority over local government permitting within the Secondary Management Area.

D. **Senate Bill 272:** California Senate Bill (SB) 272, “Sea Level Rise Planning and Adaptation,” was signed into law on October 7, 2023. SB 272 requires local governments that are within or partially within the state’s coastal zone or the jurisdiction of the San Francisco Bay Conservation and Development

Commission (BCDC), respectively, to develop Local Coastal Programs or Subregional Shoreline Adaptation Plans by January 1, 2034. SB 272 requires BCDC to create guidelines for the preparation of these plans within the San Francisco Bay Area and requires BCDC to approve or deny plans based on consistency with these guidelines. Projects and strategies contained in local government plans that receive approval from the Coastal Commission or BCDC will be prioritized for funding for the implementation of sea level rise adaptation strategies and recommended projects in the approved plan. These plans are intended to be used by cities and counties to protect their residents and communities from sea level rise and flooding hazards while promoting equitable and sustainable adaptation strategies.

Response A13-3

The relevant definitions as requested in the comment have been incorporated to the regulatory settings under Section 3.5, "Biological Resources," and Section 3.10, "Hydrology and Water Quality" to provide consistency in the EIR. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-4

Under "Regional Regulations":

A. **The San Francisco Bay Plan:** The Bay Plan is BCDC's comprehensive plan for the Bay and its shoreline. The Bay Plan guides BCDC's planning activities and its review of projects through its Regulatory program. BCDC cannot approve a permit for a project that is not consistent with the Bay Plan. The Bay Plan includes findings and policies that provide for protection of Bay resources, review of development proposals in BCDC's jurisdiction, and the design of public access. Under the McAteer-Petris Act, BCDC may amend the Bay Plan over time to address regional needs. The Bay Plan's policies are organized into several major categories including natural resources and environment (covering fish, other aquatic organisms and wildlife, water quality, tidal marshes and tidal flats, subtidal areas, and tributaries); development and use (addressing water-related industry, ports, transportation, recreation and airports); shoreline protection and public access (guiding shoreline development, fill regulations, public access requirements, and appearance and design standards); and regional issues (including climate change, sea level rise adaptation, and Bay/watershed relationships). To minimize future filling of the bay and protect waterfront land for water-dependent uses, the also uses Bay Plan identifies Priority Use Areas (PUAs), which reserve specific shoreline areas for particular water-oriented land uses. These water-oriented uses include ports, water-related industries, airports, wildlife refuges, water-oriented recreation and public assembly, desalinization plants, and power plants requiring large amounts of water for cooling purposes. The McAteer-Petris Act provides BCDC with the authority to designate and enforce these Priority Use Areas through its permitting program.

Response A13-4

The San Francisco Bay Plan definition has been incorporated to the regulatory settings under Section 3.5, "Biological Resources," Section 3.10, "Hydrology and Water Quality," and Section 3.13, "Pubic Services and Recreation" to provide up-to-date information related to the San Francsico Bay Plan. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-5

Under "Specific and Master Plans":

A. **San Francisco Bay Area Seaport Plan:** The Seaport Plan, originally adopted in 1982, is part of the San Francisco Bay Plan (Bay Plan) and is used by BCDC to help guide its regulatory decisions on permit applications, consistency determinations, and related matters. Its primary purpose is to designate and reserve Port Priority Use Areas along the Bay shoreline for existing and future maritime cargo operations,

thereby coordinating port terminal development across the region and minimizing the need for new Bay fill. The plan was most recently updated in November 2023 with assistance from a wide variety of stakeholders, including MTC/ABAG, and includes a cargo forecast through 2050 and addresses key issues including climate change adaptation, environmental justice, and regional coordination to ensure the Bay Area maintains sufficient seaport capacity to meet future waterborne cargo needs.

B. **BCDC Regional Shoreline Adaptation Plan:** The Regional Shoreline Adaptation Plan (RSAP), adopted by BCDC in 2024 as part of the Bay Plan, is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. The RSAP is a response to SB 272 (2023), which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with targeted financial assistance from the State. The RSAP includes BCDC's guidelines for local governments within BCDC's jurisdiction to prepare a Subregional Shoreline Adaptation Plan (Subregional Plan) by the legislative deadline of 2034.

The RSAP guidelines support local governments and communities in integrating shoreline adaptation strategies into their land use plans, zoning, development regulations and capital projects. The guidelines also emphasize the importance of incorporating nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. It promotes safe, sustainable, and strategic shoreline growth, ensuring that future development in areas subject to coastal and groundwater rise is resilient and aligned with regional adaptation efforts.

Response A13-5

The discussion of the San Francisco Bay Area Seaport Plan and BCDC Regional Shoreline Adaptation Plan has been revised under the "State Regulations" in Section 3.11.2, "Regulatory Setting" on pages 3.11-17 and 3.11-18 of the Draft EIR. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-6

BIOLOGICAL RESOURCES

First, BCDC should be categorized as a State agency rather than a local agency. Second, the description should acknowledge the Bay Plan's policy sections that directly address biological resources, including Fish, Other Aquatic Organisms and Wildlife; Tidal Marshes and Tidal Flats; Subtidal Areas; and Mitigation.

In addition, in 3.6.33, "Regional and County Sea Level Rise Programs and San Francisco Bay Plan", we have taken the opportunity to correct language and offer edits to the text as follows,

> **"**BCDC is charged with the protection, enhancement, and responsible use of the San Francisco Bay. The agency's jurisdiction includes the bay itself, all land within 100 feet of the bay shoreline, salt ponds, managed wetlands, and certain waterways named in BCDC's law. BCDC guides uses of the bay and its shoreline through policies set forth in the McAteer-Petris Act; the Suisun Marsh Preservation Act; the San Francisco Bay Plan, originally adopted in 1968; and the Suisun Marsh Protection Plan, originally adopted in 1977. The policies included in BCDC's San Francisco Bay Plan address the uses of both the bay and shoreline, water quality, and the approach to bay fill. Additionally, the San Francisco Bay Plan has a number of proposals, including the development of ports, land preservation, development of parks and recreation, maintaining wildlife, and managing shipping channels. In 2019, BCDC amended its San Francisco Bay Plan to allow for more substantial fill when addressing sea level rise with multi-benefit adaptation projects, as well as

added an Environmental Justice and Social Equity Amendment establishing new equity-focused requirements for project sponsors (BCDC 2020). As required by SB 272 (discussed above), BCDC published the RSAP in December of 2024. The RSAP supports local governments and communities in the Bay Area in addressing coastal flood hazard risks through coordinated and consistent adaptation planning and implementation. The RSAP establishes a regional vision for successful sea level rise adaptation, aligns regional and local priorities, reduces flood risk by improving multijurisdictional coordination, and standardizes and simplifies adaptation methods and data (BCDC 2024)."

Response A13-6

Page 3.6-30 of the Draft EIR has been revised with the additional text to clarify information on the San Francisco Bay Plan. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-7

LAND USE, POPULATION, HOUSING

Please note that the description of BCDC, the McAteer Petris Act, and the Bay Plan as part of the Regulatory Settings (3.2.2) should be categorized under State rather than Local as BCDC is a State agency.

The section on "Coastal Bay Land Uses" details the extent of the Coastal Commission's jurisdiction along the outer coast and the Coastal Zone. Please also include language that clarifies BCDC's jurisdiction in the Bay. BCDC's jurisdiction is established by the McAteer Petris Act and includes, among other types, the San Francisco Bay itself, certain waterways, and a line 100 feet landward of and parallel with the shoreline known as the "Shoreline Band," which is described in greater detail in Government Code Section 66610.

Additionally, please review the wording of the second paragraph of the "McAteer Petris Act" in section 3.11-12. We recommend rephrasing some of the language for clarity around the function of Priority Use Areas (PUAs): "To minimize future filling of the bay and protect waterfront land for water-dependent uses, the Bay Plan identifies Priority Use Areas (PUAs), which reserve specific shoreline areas for particular water-oriented land uses. These water-oriented uses include ports, water-related industries, airports, wildlife refuges, water-oriented recreation and public assembly, desalinization plants, and power plants requiring large amounts of water for cooling purposes. The McAteer-Petris Act provides BCDC with the authority to designate and enforce these Priority Use Areas through its permitting program."

Response A13-7

Relevant BCDC regulations, including the description of BCDC, the McAteer Petris Act, the Bay Plan, and Regional Adaptation Plan, have been recategorized from local and regional regulations to state regulations under Section 3.5, "Biological Resources," Section 3.6, "Climate Change, Greenhouse Gases, and Energy," Section 3.10, "Hydrology and Water Quality," Section 3.11, "Land Use, Population, and Housing," Section 3.13, "Public Services and Recreation." Additionally, page 3.11-4 of the Draft EIR has been revised to provide clarification on BCDC's jurisdiction and page 3.11-13 of the Draft EIR has been revised to provide clarification of the function of Priority Use Areas. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-8

HYDROLOGY AND WATER QUALITY

The Bay Plan includes policy sections for Water Quality and Climate Change that are relevant to the DEIR hydrology and water quality analysis. Please review these policies and include a section on the Bay Plan in the State Regulatory Framework for this section.

Response A13-8

Page 3.10-21 of the Draft EIR has been revised with the additional text to clarify to include a summary of the Bay Plan and relevant policies related to hydrology and water quality. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-9

PUBLIC SERVICES AND RECREATION

Per the McAteer-Petris Act, BCDC is tasked with ensuring maximum feasible public access to the Bay. We ask that you also include the Bay Plan's public access policies in the Regulatory Framework for this section.

Response A13-9

Page 3.13-9 of the Draft EIR has been revised with the additional text to include a summary of Bay Plan and relevant public access policies. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

Comment A13-10

TRANSPORTATION

One of BCDC's key considerations for assessing maximum feasible public access is the convenience and safety of site access where a project connects to the larger transportation network, particularly for members of the public approaching the site via the Bay Trail or by surface roads. Please review the findings and policies in the Bay Plan's sections on Transportation and Public Access and reference them in the Regulatory Framework for this section.

Response A13-10

A description of the BCDC Bay Plan as it relates to transportation has been added to the state regulatory setting in Section 3.15, "Transportation", page 3.15-15 of the Draft EIR. See Chapter 3 of the Final EIR, which provides the added text. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Draft EIR are not warranted.

Comment A13-11

Conclusion

As a reminder, any shoreline projects that may eventually use the Plan Bay Area guidance may also require permits from BCDC for any fill, extraction of materials, public access, or substantial change in use of land or water within BCDC's jurisdiction. BCDC staff will evaluate permit applications for consistency with all applicable laws and policies then in effect, and the Commission will have full discretion to grant or deny a permit application for the project on the basis of such consistency at that time.

Response A13-11

The Draft EIR acknowledges that future projects would be subject to applicable federal, state, regional, and local laws and regulations, including BCDC's permitting and review requirements. BCDC's authority is identified in the "Regulatory Setting" sections of Chapter 3.5, "Biological Resources;" Chapter 3.6, "Climate Change, Greenhouse Gases, and Energy;" Chapter 3.10, "Hydrology and Water Quality;" Chapter 3.11, "Land, Use, Population, and Housing;" and Chapter 3.13, "Public Services and Recreation." The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A13-12

We appreciate your attention to the topics discussed above and for the opportunity to make the above comments on the DEIR. If you have any questions or concerns regarding this matter, please do not hesitate to contact me at (415)-352-3654 or by email at lisa.herron@bcdc.ca.gov.

Response A13-12

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A14 City of Palo Alto

Jonathan Lait, Director
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A14-1

Dear MTC Plan Bay Area 2050+ team:

The City of Palo Alto appreciates the opportunity to provide comments on the draft environmental impact report for Plan Bay Area 2050+. City Staff have concerns about the growth projections included within the DEIR, especially how they compare to one of the plan alternatives. The City submits the following comments for your consideration.

Response A14-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A14-2

Growth Projections

The City remains concerned that the draft EIR relies on growth projections significantly higher than those currently forecasted by the California Department of Finance (DoF). While the DoF projects a 5.2% increase in Bay Area population by 2050, the Plan Bay Area 2050+ projects a 23.7% increase, with growth allocated differently across counties. The DEIR notes that the RTP should be consistent with DoF projections or explain differences, yet Table 5-1 does not align with DoF's Report P-2A (2020–2070). Without clarification for these discrepancies, it is difficult to determine whether the draft EIR accurately assesses impacts.

Response A14-2

Please refer to "Master Response 1: Regional Growth Forecast" for a discussion of forecasting methods and differences between Plan Bay Area 2050+ projections and projections prepared for other purposes (e.g., DOF).

Comment A14-3

Alternatives

City staff agrees that the "no plan" alternative would leave the Bay Area significantly worse off, and that both the draft Plan and the alternatives represent an improvement over no action. However, the City has concerns with Alternative 2, which would shift housing growth away from the Plan's designated growth geographies and concentrate development primarily within transit-oriented communities as defined by MTC. This approach appears inconsistent with published Department of Finance growth projections, which indicate that Solano and Contra Costa Counties are expected to experience comparatively higher growth rates. By redirecting growth away from these areas and concentrating it in San Francisco, Santa Clara County, and Alameda County, which together contain over 80 percent of TOC stations, Alternative 2 departs from established growth assumptions used in regional planning and infrastructure coordination. This approach would increase redevelopment pressure in already built-out urban areas while under-planning for growth in locations where it is most likely to occur. For these reasons, the City recommends that MTC not advance Alternative 2.

Response A14-3

The proposed plan and each of the alternatives in the Draft EIR assume the level of growth that MTC and ABAG have forecasted for the region The alternatives to the proposed plan are designed to accommodate the same households and jobs projections, consistent with statutory requirements. Please refer to "Master Response 3: Plan Alternatives." The comment recommending that MTC and ABAG not advance Alternative 2 will be considered by the decision makers prior to certifying the EIR and plan approval.

Comment A14-4

We appreciate MTC's efforts to support smart growth in communities across the Bay Area and welcome further opportunities to engage during future Plan Bay Area updates.

Response A14-4

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A15 Transportation Authority of Marin

Anne Richman, Executive Director
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A15-1

Dear Mr. Maloney,

The Transportation Authority of Marin (TAM) in its role as the CTA for Marin County has coordinated with MTC on the development of the Draft PBA 2050+ and previous iterations of Plan Bay Area. TAM is pleased

that this multi-year coordination effort has resulted in a regional plan that continues to address a wide array of regional planning issues, while ensuring that regional, state and federal funding continues to support transportation projects and programs needed to advance the region's transportation system. TAM staff offers the following additional comments on the Draft for your consideration.

Response A15-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A15-2

Projects: TAM is pleased that the Draft Plan continues to support the delivery of Marin transportation investments, including projects and programs identified in Marin's Transportation Sales Tax, Measure AA, and Regional Measure 3 investments in Marin County, while developing a regional pathway to make progress on critical issues such as sea level rise and safety on our local roads and highways. We are also supportive of increased Electric Vehicle investments highlighted in the plan. Local funding sources remain the largest source of revenue in the plan, and TAM remains committed to delivering infrastructure improvements to benefit all who live, visit and travel to Marin County.

Incorporating Local Planning: With changing federal policy emphasis, upcoming federal transportation reauthorization discussions, and increasing challenges in meeting state greenhouse gas emission reduction targets by 2035, MTC's Draft PBA 2050+ was developed under an increasingly challenging policy framework. TAM encourages MTC to continue to meet state and federal requirements while still reflecting local needs in these processes. With all nine Bay Area counties actively developing countywide transportation plans, MTC should consider how these plans can support, and potentially streamline the development of future PBA efforts.

Towards a Common Data Framework: With regional policy-based forecasts serving as a critical element of the plan, MTC should continue to strive towards the development of a common framework for data, both as input into the plan, as well as an output of the plan. Previous efforts such as BASIS to build a shared understanding and common set of local data should continue to be advanced, as well as additional efforts to account for the differences between Plan Bay Area policy forecasts and other state forecasts used in economic development or other planning forecasts (an issue about which TAM has previously commented). Ensuring that transportation investments account for a range of future policy driven outcomes is a worthwhile endeavor to support transportation needs, and builds the value to local agencies in the role the RTP/SCS can play in their local planning efforts.

Resilience: We appreciate the inclusion of the resilience project list in the Draft and would like to ensure that MTC's resilience work aligns with the work that local agencies are undertaking with their Shoreline Adaptation Plans such that the outcomes of the local plans can be represented in PBA 2050+ or future updates. Additionally, as PBA 2060 is initiated in 2026, TAM requests MTC further consider how the region can advance sea level rise and wildfire evacuation to a more integrated and holistic approach in the plan. New models for cooperation and regulatory consistency may be needed to advance these types of projects, accounting for multiple agencies/partners as well as multiple and as-yet largely undefined funding sources; we would like to see these efforts supported by regional planning.

Geographies: We request that MTC continue to partner with local agencies on Equity Priority Community definition and Priority Development Areas updates to reflect an updated policy landscape. This is an important local issue as housing requirements change through legislation, and as demographic and economic forces potentially shift over time. Maintaining access to regional funding in support of many diverse types of projects and communities is an important aspect of our mutual work.

Transit 2050+: TAM would like to continue to work with MTC on Transit 2050+ implementation and the Transit Priority Policy for Roadways and future discussions around the role of transit and transit facilities on suburban and rural roadways. Additionally, we would like to work together, along with Caltrans and other partners, to better define and support appropriate transit facilities on the state highway system.

PBA 2050+ Implementation: TAM would also like to continue to work with MTC on other aspects of the Plan implementation relevant to our overlapping work areas. Additional detailed comments on the Implementation section of the Draft are attached.

As TAM and other CTAs continue to rise to the challenges the region faces, TAM requests that MTC continue to coordinate and facilitate these planning efforts with TAM and local agencies.

Response A15-2

The commenter expresses support for the plan's strategies and requests continued coordination on implementation topics. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation."

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A16 Town of Danville

Tai Williams, Town Manager
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A16-1

Dear MTC/ABAG Boards:

The Town of Danville appreciates the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) for Plan Bay Area (PBA) 2050+. We appreciate the importance of this forward planning document to guide housing and transportation, protect the environment, and build resiliency in the bay area region.

Based upon our review of DEIR and accompanying technical documents, the Town would like to submit the following comments:

Response A16-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A16-2

1. **PBA 2050+ Regional Growth Forecast Inconsistent with Department of Finance:** The Draft PBA 2050+ population forecasts that in the 30-year period between 2020 and 2050, the region's population will grow by 1.84 million people to 9.6 million, a 24% increase. While this projection has been reduced by over 750,000 from the Plan Bay Area 2050 projections, this number continues to be inconsistent with the California State Department of Finance (DOF) forecast of approximately 8.15 million people by year 2050, a 6.4% increase. The Town requests that the Final EIR provide a detailed explanation of this discrepancy, and the reasoning for why the PBA 2050+ forecast was chosen.

Response A16-2

Please refer to "Master Response 1: Regional Growth Forecast" for further discussion of forecasting methods and differences between Plan Bay Area 2050+ projections and projections prepared for other purposes (e.g., DOF).

Comment A16-3

2. **Building Industry Association Settlement Agreement Components and Compliance Information:** While this section acknowledges that the Settlement Agreement created "ongoing obligations" for MTC and ABAG, it offers no explanation of how the settlement influences housing assumptions, fails to explain how the litigation settlement may affect local infrastructure capacity, displacement, or affordability. The omission of details about the settlement leaves local governments unable to evaluate whether PBA's assumptions reflect a legal necessity or policy preference, or how it may impact the Regional Housing Need Allocation process.

Response A16-3

Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement."
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Comment A16-4

3. **Alternatives to the Proposed Plan (Table 3.34: Summary Comparison of EIR Impacts):** The EIR identifies 67 potentially significant environmental impacts within the 14 mandatory EIR categories. Thirty-five of them (52%) are rated as Significant and Unavoidable impacts. Many of the proposed mitigation measure to reduce environmental impacts (although not to a level of insignificance) include the language "if feasible." The feasibility of implementing a mitigation measure may be subjective, leading some cities to implement the mitigation measures while others determine not to. This can lead to inconsistencies in development requirements from city to city and reduced regional accountability. The Town requests a clearer and less ambiguous mitigation implementation strategy that levels the playing field for all jurisdictions.

Response A16-4

The majority of impacts in the Draft EIR are considered to be significant and unavoidable because it is outside of MTC and ABAG's authority to require local implementing agencies to adopt mitigation measures included in the EIR. Please refer to "Master Response 2: EIR Mitigation Measures." It is ultimately the responsibility of a lead agency for future projects to determine and adopt mitigation. MTC and ABAG are not able to determine if mitigation measures would be feasible for all lead agencies at the project-level and, thus, the language "if feasible" is included as part of the mitigation measures.

Comment A16-5

The Town appreciates the opportunity to comment on the adequacy of the DEIR and look forward to reviewing your responses.

Response A16-5

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A17 City of Livermore

John Marchand, Mayor
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A17-1

Thank you for the opportunity to provide comments on Draft Plan Bay Area 2050+ (Plan) and associated Environmental Impact Report (EIR). The City of Livermore (City) and Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG) have been engaged in numerous conversations about this project, and we appreciate the collaborative approach to this regional planning effort.

Since 2008, the City has actively participated in the Bay Area Region's Sustainable Communities Strategy. There are two Priority Production Areas, and three Priority Development Areas identified in Plan Bay Area 2050 that are located in Livermore. The City is analyzing the development of these areas through its General Plan Update, including in the Midtown Neighborhood and the Oaks Business Park (west side PPA) through the creation of the Isabel Inn ovation Corridor.

The City seeks to better understand the assumptions used in the Draft Plan and associated EIR so that we may continue to collaborate on strategies to advance shared goals. Specifically, this letter includes the City's comments regarding growth projections and the Valley Link Rail Project.

Response A17-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A17-2

Growth Projections

The City recognizes that there are conflicting estimates for population and growth projections between those presented in the Draft Plan and those published by the California Department of Finance. To support a transparent and collaborative planning process, we respectfully request clarification regarding the methodology and rationale used to develop the projections evaluated in the Plan . Should the projections be revised to align more closely with alternative data sources, (including those from the California Department of Finance), the City recommends revaluating the EIR and its associated mitigation measures to ensure consistency and accuracy in addressing potential impacts.

Response A17-2

Please refer to “Master Response 1: Regional Growth Forecast” regarding the proposed plan’s forecasted population growth, versus the population growth forecasted by the Department of Finance.

Comment A17-3

Valley Link Rail Project

The Draft Plan identifies the Valley Link Rail Project (Valley Link) as transportation strategy #12 (T12), which assumes $28 billion reserved for expanded transit services. Further, the City is aware that the Tri-Valley San Joaquin Valley Regional Rail Authority (Authority) has recently modified the rail alignment, including the initial operating segment alignment, and is actively conducting further environmental analysis to evaluate the re-alignment.

The Valley Link Rail Project's Phase 1 has been restructured into two distinct segments - Phase 1A and Phase 1 B.

- Phase 1A introduces a new alignment consisting of an approximately 10-mile segment connecting the Dublin/Pleasanton BART station to the ACE rail system at the Livermore Vasco Road Station . This represents a significant departure from the original alignment, featuring a proposed Z-curve that veers off 1-580 th rough Midtown (along Southfront Road), terminating at the ACE Vasco Station rather than continuing over the Altamont Pass to Mountain House.

- Phase 1 B comprises the remaining 12-mile segment extending over the Altamont Pass to Mountain House, which is planned for future development pending additional funding. The original Phase 2, which extends from Mountain House to Lathrop, remains unchanged, with its project phasing and delivery strategy yet to be determined.

The Authority is conducting ridership projections, transportation analysis, and preparing a revised CEQA/NEPA environmental document to address the new alignment with plans to consider this document for approval in mid-2026. There remain outstanding questions regarding capital funding and system operations.

It is the City's understanding that this modification results from the project costs significantly increasing, and the project is now estimated to cost approximately $4 billion.

These project changes do not appear to be captured in the Plan. Therefore, the City recommends that the funding and implementation strategies in the Plan be updated to align with the current project scope, phasing and cost estimates.

We look forward to continued coordination and collaboration with MTC/ABAG and the opportunity to provide additional comments throughout the planning process. If you have any questions, feel free to contact me at (925) 960-4020 or mayormarchand@livermoreca.gov.

Response A17-3

The Draft EIR prepared for the proposed plan is a program level document and does not address the impacts of specific projects. Please refer to “Master Response 4: Program Level Document.” The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. As noted in the comment, the Valley Link project scope continues to evolve as the project advances through project development and seeks to reduce costs to match currently available funding sources while also optimizing project benefits. The project descriptions included in the Draft Plan Bay Area 2050+ Transportation Project List were finalized at the beginning of 2025. Please refer to “Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities” for a discussion of modifications to specific projects included in the plan’s project lists. MTC is continuing to work closely with the project sponsor as they continue to revise the project scope and costs. Once finalized, MTC will move forward with a revision to Plan Bay Area 2050+ to reflect any changes to the Valley Link project scope, cost, and implementation schedule.

Comment A17-4

We look forward to continued coordination and collaboration with MTC/ABAG and the opportunity to provide additional comments throughout the planning process. If you have any questions, feel free to contact me at (925) 960-4020 or mayormarchand@livermoreca.gov.

Response A17-4

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A18 Delta Stewardship Council

Jeff Henderson, Deputy Executive Officer
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A18-1

Dear Adam Noelting:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the Metropolitan Transportation Commission/Association of Bay Area Governments' (MTC/ABAG) Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (Plan Bay Area 2050+). The Delta Stewardship Council (Council) recognizes the objectives of Plan Bay Area 2050+ as described in Plan Bay Area 2050+ and Draft EIR, to achieve various federal, state, regional, and local policy objectives related to sustainable development, transportation, and greenhouse gas emission reduction while considering financial, growth, and regulatory constraints. This letter summarizes requirements of the Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, §85000 et seq., Delta Reform Act.) pertaining to Plan Bay Area 2050+ and provides the Council's comments on the Plan Bay Area 2050+ and Draft EIR.

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.)

MTC/ABAG's Plan Bay Area 2050+ is a regional transportation plan (RTP) for a nine-county region that includes Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano, and Sonoma Counties and 101 cities located in these counties. Portions of Alameda, Contra Costa, and Solano Counties are located within the Delta.

Response A18-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A18-2

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 RTP/sustainable communities strategy (SCS) that includes land within the primary and secondary zones of the Delta. (Wat. Code, § 85212.) The Delta Reform Act also requires the Council to review the RTP/SCS for consistency with the Delta Plan and more specifically for both of the following:

- the consistency of local and regional planning documents with the ecosystem restoration needs of the Delta.

- whether the lands set aside for natural resource protection are sufficient to meet the Delta's ecosystem needs. (Wat. Code, § 85212.)

The Delta Reform Act then requires MTC/ABAG to provide a draft RTP/SCS to the Council no later than 60 days prior to the adoption of the final regional transportation plan. (Wat. Code, § 85212.)

Council staff and MTC/ABAG staff met for consultation on the Plan Bay Area 2050+ on October 19, 2023. MTC/ABAG submitted its Plan Bay Area 2050+ and Draft EIR to the Council staff on October 20, 2025.

Response A18-2

These remarks provide background information and do not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A18-3

Council's Review and Input on Plan Bay Area 2050+ and the Draft EIR

This section summarizes Council staff's review of and input on Plan Bay Area 2050+. It also summarizes Council staff's comments on the Draft EIR.

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

    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. 136-138). 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.) Four PHRAs are located partially or wholly within the Plan Bay Area 2050+ planning area: (1)Suisun Marsh; (2) Cache Slough; (3) Yolo Bypass; and (4) Western Delta PHRA1.

In our February 14, 2025, comments on the Notice of Preparation (NOP) for the Draft EIR, Council staff identified that Plan Bay Area 2050+ designates locally nominated Priority Conservation Areas (PCAs), which are lands set aside for protection. The Council supports the proposed PCA designation in Cache Slough, which aligns with the Cache Slough PHRA. The Council also supports two additional proposed PCAs located partially within a Delta PHRA: the Delta Recreational Area PCA, which covers the Dutch Slough portion of the Western Delta PHRA; and the Tri-City-County Cooperative Planning Area PCA, which covers the northwestern corner of the Suisun Marsh PHRA. These proposed PCAs complement the existing East Contra Costa County Habitat Conservation Plan/Natural Community Conservation Plan PCA.

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

Response A18-3

Thank you for your comment. The comment states that the Draft EIR is in compliance with the Water Code and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A18-4

b. Sufficiency of Lands Set Aside

Plan Bay Area 2050+ does not specifically address setting aside lands for natural resource protection. MTC/ABAG notes that this is the prerogative of public agencies that approve land use plans and projects, such as a city or county, to include priority development areas aimed at improving transportation, housing, the economy, and environmental issues. However, Plan Bay Area 2050+ incentivizes natural resource protection by encouraging growth in existing population centers and by maximizing the efficiency of the existing transportation network and, therefore, would not physically divide established communities. Plan Bay Area 2050+ core growth approach is to focus growth within existing communities along the established transportation network reflecting the foundational and regional growth pattern established in the original Plan Bay Area (2013), Plan Bay Area 2040 (2017), and Plan Bay Area 2050 (2021). Plan Bay Area 2050+ anticipates that growth geographies will contain 95% of new households and 72% of new jobs. Less than 1% of new development is anticipated to occur outside local urban growth boundaries (Plan Bay Area 2050+ p.11).

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. Plan Bay Area 2050+ and the 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 Draft EIR (p.1-20, Table 1-2). Based on the mapped locations in the Draft EIR, the Plan Bay Area 2050+ would provide CEQA streamlining benefits to projects located within portions of Contra Costa and Solano Counties, and cities within them, located within the Delta. Thus, it appears the locations of the High Frequency Transit areas in the Plan Bay Area 2050+ are not likely to result in development in areas within the Delta that are necessary to meet the Delta's ecosystem needs.

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

Response A18-4

Thank you for your comment. The comment states that the Draft EIR is in compliance with the Water Code and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A18-5

2. Consistency with Land Use Pattern and Transportation Investments

    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. Proposed residential, commercial, and industrial development must be limited to areas that a city or county general plan designates for a specific allowable land use as of the Delta Plan's adoption date 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 Contra Costa, Solano, and Alameda 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).

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 (covered action) is required 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 the 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 emission reduction targets. (Wat. Code, § 85057.5, subd. (b)(4).) MTC/ABAG is the MPO for the San Francisco Bay Area Region, which contains portions of the secondary zone of the Delta. Thus, Water Code section 85057.5, subdivision (b)(4), provides MTC/ABAG with a role in shaping the State's Delta Policy.

Council staff's comment letter on the NOP dated February 14, 2025, requested the Draft EIR analyze whether Plan Bay Area 2050+ would include new urban development within the Delta. The Draft EIR acknowledges consistency with Delta Plan Policy DP P1 in the Land Use, Population, and Housing Section 3.11-25.

Regional growth anticipated under Plan Bay Area 2050+ 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 Draft EIR states that:

"Projected development could affect consistency with the Delta Plan adopted by the Delta Stewardship Council if projects could expand urban development within the Delta. To be consistent with Delta Plan Policy DP P1 new residential, commercial, or industrial development is permitted outside the urban boundaries only if it is consistent with the land use designated in the relevant county general plan as of the date of the Delta Plan's adoption …"

Finding: Based on a review of Plan Bay Area 2050+ and the Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency of Plan Bay Area 2050+ with Delta Plan Policy **DP P1**.

Response A18-5

Thank you for your comment. The comment states that the Draft EIR is in compliance with the Water Code and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A18-6

b. 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 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).

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 recommended transportation projects identified in Plan Bay Area 2050+ with Delta Plan recommendations concerning transportation in the Delta.

Response A18-6

Thank you for your comment. The comment states that the Draft EIR is in compliance with the Water Code and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A18-7

Closing Comments

Pursuant to Water Code section 85212, Council staff has reviewed and provided advice and input on the Draft EIR and Plan Bay Area 2050+ as outlined in this letter. Council staff has not identified any inconsistency with the Delta Plan. Council staff finds that 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 MTC/ABAG to continue to engage Council staff following the adoption of the Plan Bay Area 2050+ to coordinate implementation and subsequent plan updates. Please contact Eva Bush at eva.bush@deltacouncil.ca.gov with any questions.

Attachment 1: Suggested edits regarding the Delta Stewardship Council and the Delta Plan.

Response A18-7

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A18-8

Attachment 1

Suggested edits regarding the Delta Stewardship Council and the Delta Plan

Deletions are in ~~strikethrough~~, additions in <u>underline</u>.

Pg 3.5-29 Under heading: Sacramento-San Joaquin Delta Reform Act of 2009

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act (Delta Reform Act) (California Water Code Section ~~10610~~ <u>85000</u> et seq.), also known as Senate Bill (SB) 1 (Stats. 2009, 7th Ex. Sess., ch. 5) (SB X7-1), one of several bills passed at that time related to water supply reliability, ecosystem health, and the Delta. The Delta Reform Act created the Delta Stewardship Council (DSC), charged with developing and adopting the Delta Plan. ...

...

The Delta Reform Act expressly provides that "covered actions" do not include (1)regional transportation plans, such as the proposed plan, and (2) plans, programs, projects, activities (and any infrastructure necessary to support those plans, programs, projects, or activities) within the secondary zone of the Delta that has been determined to be consistent with the proposed plan(California Water Code Section 85057.5). However, DSC reviews any plan that includes land within the Delta zones, whether or not it is a covered action. Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow a consultation procedure with DSC. This procedure includes early coordination to determine consistency of a proposed plan with the Delta Plan. MTC and ABAG consulted with DSC on ~~December 12, 2019, and January 22, 2020~~ October 19, 2023, on the application of the law, the geography under DSC authority, and the policies established by the DSC, and will follow the Delta Reform Act's consultation requirements. ...

Pg 3.11-25 Under heading: Delta Plan

Portions of Alameda, Contra Costa, and Solano Counties overlap with areas covered by the Delta Plan. The Delta Plan encompasses the Primary and Secondary Zones of the Sacramento–San Joaquin Delta as well as the Suisun Marsh. The boundaries, which are described in Delta Plan Policy DP P1, Locate New Urban Development Wisely (23 CCR Section 5010), are intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk. Delta Plan Policy DP P1 is consistent with the Delta Reform Act ~~(PRC Section 29702)~~ (Water Code Section 85000 et seq .) and the Delta Protection Act, (PRC Section 29702) which states that one of the basic goals of the State for the Delta is to "[p]rotect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities." Projected development could affect consistency with the Delta Plan adopted by the Delta Stewardship Council if projects could expand urban development into the Delta. In order to be consistent with Delta Plan Policy DP P1, new residential, commercial, or industrial development is permitted outside the urban boundaries only if it is consistent with the land use designated in the relevant county general plan as of the date of the Delta Plan's adoption (~~January 2019~~ May 16, 2013). ...

Jurisdictions with land in the Primary ~~Zone~~ and Secondary Zones are required ~~by PRC Section 29763~~ to adopt local and regional planning documents that are consistent with ~~general plans with land uses consistent with the goals and~~ the policies in the Delta Plan, subject to review by the Delta Stewardship Council (Water Code Section 85212). Therefore, subsequent projects within the proposed plan that fall within the Delta Plan boundaries would be required to demonstrate consistency with the plan and satisfy mitigation requirements.

Pg 3.11-29 Under heading: Delta Plan

Portions of Alameda, Contra Costa, and Solano Counties overlap with areas covered by the Delta Plan, adopted by the Delta Stewardship Council. The boundaries, which are described in Delta Plan Policy DP Pl, Locate New Urban Development Wisely (23 CCR Section 5010), are intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk. Delta Plan Policy DP P1 is consistent with the Delta Reform Act ~~(PRC Section 29702)~~ (Wat. Code, Sect. 85000 et seq.) (Water Code Section 85000 et seq .) and the Delta Protection Act, (PRC Section 29702), which states that one of the basic goals of the State for the Delta is to "[p]rotect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities."

Response A18-8

Pages 3.5-29, 3.11-25, and 3.11-29 of the Draft EIR have been revised with the suggested edits from the Delta Stewardship Council regarding the Delta Plan. See Chapter 3, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A19 City of Pleasanton

Gerry Beaudin, City Manager
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A19-1

Dear MTC-ABAG:

This letter is on behalf of the City of Pleasanton, in response to the release and request for comments on Draft Plan Bay Area 2050+ and associated Draft Environmental Impact Report (DEIR).

The City appreciates MTC-ABAG's efforts to update Plan Bay Area 2050, recognizing the significant shifts in commuter behaviors, the commercial real estate market, and transit ridership since the COVID-19 pandemic. We also appreciate the substantial challenge in creating a long-range regional planning document like Plan Bay Area, given the geographic diversity of the Bay Area region and the rapidly changing economic, land use, and transportation landscape

Response A19-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A19-2

Despite these inherent challenges, Plan Bay Area serves as a foundational document outlining how MTC-ABAG allocates transportation and infrastructure funding. Significantly, Plan Bay Area's projections and policies are also tied to the Regional Housing Needs Allocation (RHNA) process and the resultant local housing targets. As you are aware, significant questions were raised about the HCD process for developing and allocating regional housing needs in the 6th Cycle, with far-reaching implications for local jurisdictions held accountable for the "production" of those units in the current cycle.

As such, and based on review of the regional growth projections and absent details regarding the methodology for projections specifically for Pleasanton, the City is concerned that projections for both population/households, as well as jobs and economic growth, may not align with the City's policy documents and assumed growth projections in its own models and zoning. The aggregation of growth projections into subregional areas that cover, in Pleasanton's case, the entire Tri-Valley and a large portion of eastern Alameda County, as well as long-range (2050) forecasts without intervening data points, makes it impossible to meaningfully understand or compare Plan Bay Area's jobs and housing projections with local land use and zoning conditions.

The City is requesting details for review before it can provide further comments. Please provide the metrics used for Pleasanton (citywide and specific areas such as Downtown and Hacienda). The City also requests

details on the comprehensive analytical process used to develop geographic distributions (e.g., for the Tri-Valley or the East Bay).

The City takes seriously its role in helping to meet demands for both residential and employment-related growth, while balancing that with the existing and planned capacity of its infrastructure and other potential local impacts to ensure that existing service levels are maintained and the future 7th Cycle RHNA will be fairly and appropriately assigned.

Thank you for your attention.

Response A19-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth and its relationship with RHNA. Master Response 1 details the regional growth forecast methodology. The growth projections for subregional areas reflect the impacts of the plan's growth framework and strategies that aim to focus future housing and jobs growth in areas that are identified either by local jurisdictions or because of their proximity to transit or access to opportunity. Please refer to the adopted Growth Geographies and the Plan Bay Area 2050+ Forecasting and Modeling report for additional details on the methodology and assumptions of the projections. Regarding the forecasted growth for intervening years, partners can use the nine-county total regional growth forecast, which is produced in five-year increments, to interpolate between household and job projections between the base year and future years. Regarding projections for the City of Pleasanton and specific areas within the city, the proposed plan does not produce projection at the jurisdiction level, because Bay Area UrbanSim is a statistically driven simulation model that was primarily calibrated and validated for use at more aggregated levels to support the regional plan. However, the proposed plan offers data at the more granular Traffic Analysis Zone 1454 (TAZ) level. This technical dataset is consistent with the proposed plan's higher-level growth forecasts but is not considered a formally approved plan deliverable, and should only be used as a reference for local modeling and analysis purposes such as travel modeling. Please refer to the "Forecast and Modeling Data" section on the "Partner Resources" webpage under 2050+ Draft Plan.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A20 Alameda County

Sandra Rivera, Community Development Agency Director, Planning Department
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A20-1
Draft Plan Bay Area 2050+

Transportation Element

- **T2 – Improve the Rider Experience through Transit Network Integration:** Better public transit connections to East Bay Regional Parks is a frequent request from residents, particularly in Ashland (i.e. increased AC Transit/shuttle from Bay Fair BART station).
- **T4 – Enhance Security Measures and Improve Safety and Cleanliness on Transit:** Safety on transit and at stations/stops is a key concern for residents in the unincorporated area. These

insights were voiced during recent outreach for the Bay Fair Community-Based Transportation Plan (CBTP).

- **T5 – Implement Pricing Strategies to Manage Demand:** Request clarity on toll revenue allocation and mitigation measures for low-income residents affected by new highway tolling (Express lanes are already in use in the unincorporated areas on HWY 880 and 580 in East County with new usage-based pricing proposed).

- **T7 – Expand Freeways and Mitigate Impacts:** Freeway expansion is generally no longer considered best practice. What is the criteria for expansion and what are the proposed mitigation strategies for the surrounding neighborhoods?

- **T11 – Enhance Transit Frequency, Capacity and Reliability:** Note that infrequent and unreliable transit is a top concern for those living in Ashland. These insights were voiced during recent outreach for the Bay Fair CBTP and during development of the Environmental Justice Element.

- **Map 4-3 – Regional Active Transportation Network:** Recommend adding countylevel maps in an appendix to improve readability.

- **Map 4-4 – Regional Transit Investments:** There does not appear to be any new or modernized Express bus service in Unincorporated Alameda County. Is the extension of the Tempo BRT down E 14th St still under consideration?

Housing Element

- Will the final plan consider the recently passed SB 79? If so, how will SB 79 affect the PBA 2050+ model assumptions?

Economy Element

- **EC2 – Expand Job Training and Incubator:** We support the modifications to EC2 to center potential locations of job training at key transit hubs but request considerations for rural communities (i.e. agriculture-based programs in East County).

Environment Element

- Improved public transit access to East Bay Regional Parks is a long-standing request from residents in the Eden Area, specifically Ashland (see comment on T2 and T11)

- **EN6 – Expand Urban Greening in Communities:** We suggest including Urban Farming opportunities as an eligible form of urban greening. Urban farming programs were a recommendation that came out of our Environmental Justice Element.

Page 126 – CBTP Guidance

- Recommend adding dedicated funding for CBO compensation to strengthen partnerships and build organizational capacity.

Response A20-1

The commenter provides recommendations for and asks questions about the proposed plan that will be considered by the MTC Commission and ABAG Executive Board in their decision-making regarding the proposed plan. These comments do not raise a specific issue related to the Draft EIR or the analysis of environmental impacts, but MTC and ABAG address the comments and questions as follows:

Transportation Element

- **T2 – Improve the Rider Experience through Transit Network Integration / Access to Parks.** As a long-range regional plan, the proposed plan articulates a high-level vision for improving and enhancing transit service across the Bay Area. Strategy T2 focuses on systemwide improvements that advance regional transit performance and integration. The commenter's recommendation to improve transit access to East Bay Regional Parks (including improved connections from Bay Fair BART) is noted and will be considered as part of plan implementation and coordination with transit operators and local partners.

- **T4 – Enhance Security Measures and Improve Safety and Cleanliness on Transit.** Strategy T4 supports improved safety and security on transit vehicles and at stations and stops, including approaches that may be advanced in coordination with transit operators. The commenter's concerns regarding transit safety in the unincorporated area are noted and will be considered.

- **T11 – Enhance Transit Frequency, Capacity, and Reliability.** Strategy T11 includes targeted transit project investments, including projects in Alameda County, to support broader regional objectives. The commenter's request to improve transit frequency and reliability serving Ashland and the Eden Area is noted and will be considered.

- **T5 – Implement Pricing Strategies to Manage Demand (Express Lanes / Tolling / Equity).** Strategy T5 includes usage-based pricing mechanisms intended to manage traffic, reduce vehicle miles traveled (VMT), and support climate goals. While peak-period distance-based tolling on all Bay Area highways is identified as a placeholder strategy, the plan acknowledges that this approach will be revisited based on the recommendations of the Next Generation Bay Area Freeways Study, which did not recommend a singular pricing strategy. A regional, mileage-based, all-hours user fee for all Bay Area roads was identified as an alternate pricing strategy.

    - **Revenue allocation:** While the plan calls for revenues collected under this strategy to be reinvested in corridor and transit improvements, it does not identify a specific allocation framework because it is not a funding document. However, the Next Generation Bay Area Freeways Study identified a potential reinvestment framework, including transit frequency improvements and first-mile shuttle connections, local road bus priority infrastructure, road safety design elements, and reparative infrastructure in freeway-adjacent low-income communities, and emphasized the importance of a nexus between where tolls are collected and where reinvestment occurs.

    - **Equity / mitigation measures:** Strategy T5 includes affordability measures such as monthly toll caps for lower-income households to limit burden and discounts for higher-occupancy vehicles to encourage carpooling and shared travel.

- **T7 – Expand Freeways and Mitigate Impacts.** Strategy T7 focuses on implementing targeted widenings to address chronic bottlenecks and achieve short-to-medium-term congestion relief. The strategy is limited to a small number of projects in corridors with advanced environmental clearance and strong funding commitments, and is not intended as a broad highway expansion program. Some funds are also assigned to VMT mitigation activities. A range of VMT mitigation strategies is available, as outlined in the Caltrans SB 743 Program Mitigation Playbook.

- **Map 4-3 – Regional Active Transportation Network.** The recommendation to add county-level maps in an appendix to improve readability is noted. Additionally, as part of the release of the proposed plan, county-level maps were made available on the Plan Bay Area website (https://planbayarea.org/draftplan).

- **Map 4-4 – Regional Transit Investments / Express Bus and BRT.** Plan Bay Area 2050+ includes express bus, rapid bus, and BRT services across the region. Express bus generally operates on highways over long distances, while rapid bus and BRT generally operate on local streets to provide faster local transit. The project referenced by the commenter is included in the plan as RTPID 25-T11-139 "E 14th St/Mission St/Fremont Blvd" and is shown on Map 4-5, rather than Map 4-4. Plan Bay Area 2050+ also includes new express bus service in unincorporated Alameda County shown on Map 4-4, including the I-680 Express Bus between Martinez and San Jose (RTPID 25-T11-144).

Housing Element (SB 79)

The commenter asks whether the final plan will consider SB 79 and how it may affect model assumptions. The plan's assumptions for the allowable densities in the areas to which Senate Bill 79 (SB79) applies meet or exceed the minimum levels required by this bill.

Comment A20-2
Plan Bay Area 2050+ Draft EIR

- Supportive of the consideration of proposed alternatives.

Response A20-2
The comment expresses support for the consideration of proposed alternatives. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A20-3

- **Impact AGF-1 through AGF-3:** It is very important to the agricultural economies in Alameda County that the Urban Growth Boundary and similar policies continue.

Response A20-3
Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The proposed plan includes Strategy EN4, which encourages maintaining urban growth boundaries.

Comment A20-4

- **Impact AQ-2:** Dust and exhaust mitigation are particularly important to mitigate negative public opinion of new construction.

Response A20-4
Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Mitigation Measure AQ-2 includes construction best practices for exhaust and dust control.

Comment A20-5

- **Impact LU-4:** We request that a housing-specific mitigation measure be included here, given the housing priorities described in the draft Plan Bay Area 2050+.

Response A20-5
Impact LU-4 (pages 3.11-32 through 3.11-33 of the Draft EIR) considers whether the proposed plan would displace substantial numbers of existing people or housing, necessitating the construction of replacement housing. Mitigation Measure LU-4 was identified to reduce the severity of environmental

effects associated with the construction of replacement housing. Mitigation Measure LU-4 incorporates by reference all of the following: Mitigation Measures AES-1 through AES-4; Mitigation Measures AGF-1 through AGF-3; Mitigation Measures AQ-2 through AQ-4; Mitigation Measures BIO-1 through BIO-3 and BIO-5; Mitigation Measures GHG-1 and GHG-3; Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4; Mitigation Measure GEO-7; Mitigation Measures HAZ-4, HAZ-6 and HAZ-7; Mitigation Measure LU-1; Mitigation Measures NOISE-1 through NOISE-4; Mitigation Measures PSR-1 and PSR-2; Mitigation Measures PUF-1 through PUF-4; and Mitigation Measure TRA-2. The Draft EIR concludes that the impact would be significant and unavoidable, even after the imposition of Mitigation Measure LU-4, because the construction of replacement housing would contribute to impacts on aesthetics, agriculture and forestry resources, air quality, biological resources, greenhouse gas emissions, cultural and tribal cultural resources, hazards and hazardous materials, land use, noise, public utilities, and transportation that cannot be fully mitigated.

As described in CEQA Guidelines section 15126.4, mitigation measures are intended to minimize significant environmental effects, not to achieve policy objectives. The creation of new housing is a policy objective of the proposed plan (see Section 2.2.1, "Project Objectives," on page 2-3 of the Draft EIR). To achieve this objective, the proposed plan includes strategies to protect and preserve affordable housing, spur housing production for people of all income levels, and create inclusive communities (see pages 2-6 and 2-7 of the Draft EIR). No additional housing-specific mitigation is required for Impact LU-4 beyond the Mitigation Measure LU-4 already identified to reduce the severity of environmental effects from the construction of replacement housing.

Comment A20-6

- **Impact NOISE-4:** Indoor noise attenuation continues to be a standard component of the Alameda County ALUCP recommendation process. A more significant concern related to airports: is there a role for MTC-ABAG in mitigating development pressures on Bay Area airports, both for the safety of residents as well as airport activities? How can the pressures be mitigated?

Response A20-6

Impact NOISE-4 acknowledges that most airports and airfields within the plan area have an active ALUCP (or the equivalent) that establishes land use policies and criteria to limit future incompatible uses in certain areas and minimize noise impacts to people living and working within the ALUCP area. The airport land use commission (ALUC) is responsible for identifying land use compatibility standards that apply to projects under the proposed plan and determining whether the project is compatible, incompatible subject to specific conditions, or incompatible. Neither ABAG nor MTC serve as an ALUC for airports within the Bay Area. Impact NOISE-4 discloses that implementation of the proposed plan's forecasted development pattern could potentially result in new land use development near existing airports such that sensitive receptors would be exposed to noise levels that exceed applicable exterior and interior noise thresholds. Mitigation Measure NOISE-4 requires a site-specific noise study for projects under the plan near airports. The site-specific noise study is required to consider and evaluate existing aircraft noise based on specific aircraft activity data for the airport in question and include recommendations for site design and building construction to ensure compliance with interior noise levels of 45 dBA community noise equivalent level (CNEL) such that potential for sleep disturbance is minimized. Under Mitigation Measure NOISE-4, a site-specific noise study would be required for all new development proposed to be located within an existing airport influence zone, as defined by the locally adopted ALUCP or local general plan. Because MTC and ABAG cannot require local implementing agencies to adopt this mitigation measure and because site-specific impacts cannot be evaluated at the program level, the Draft EIR concludes that projects implemented under the proposed plan would have the potential to expose people residing or working in the project area to excessive noise levels and the impact is significant and unavoidable.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A21 City of San Rafael

Kate Colin, Mayor
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A21-1

Dear MTC and ABAG Boards,

On behalf of the City Council of the City of San Rafael, we appreciate the opportunity to comment on Draft Plan Bay Area 2050+ and its accompanying environmental analysis. We recognize that Plan Bay Area 2050+ is an update to Plan Bay Area 2050, and that the region will begin work on the next comprehensive update – Plan Bay Area 2060 – in the coming years. We welcome early and continued collaboration with MTC and ABAG as that work moves forward.

With responsibility for local land use planning, housing element implementation, emergency preparedness, infrastructure delivery, environmental stewardship, and fiscal accountability, our City Council is invested in ensuring that regional plans are both analytically sound and practically aligned with local conditions.

Response A21-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A21-2

Our comments focus on four core themes:

1. Importance of sustained collaboration on Equity Priority Community definitions;
2. Need for clearer prioritization and partnership around sea level rise and climate resilience;
3. Value of realistic, transparent growth assumptions as the region looks ahead to Plan Bay Area 2060 and its implications for RHNA; and
4. Opportunity for regional plans, funding, and policies to more directly support local housing element implementation, priority development areas, and transit investments.

Together, these issues reflect where closer coordination between MTC, ABAG, and local governments can most meaningfully strengthen future regional planning outcomes.

Response A21-2

Please refer to Responses A21-3 through A21-8 below..

Comment A21-3

1. Continued Coordination on Equity Priority Communities

We appreciate MTC's engagement last year regarding the Equity Priority Communities (EPC) framework. We appreciate MTC's responsiveness to those concerns and emphasize the importance of maintaining EPC designations in a manner that recognizes historic disinvestment, structural inequities, and lived

community experience – particularly in communities such as the Canal neighborhood, which have faced decades of underinvestment and exclusion.

Going forward, we strongly encourage MTC to continue partnering with local government and community stakeholders as EPC definitions evolve, including through the forthcoming EPC re-envisioning work. Ensuring that equity frameworks remain grounded in both quantitative data and qualitative, place-based context will be essential to achieving meaningful outcomes and maintaining trust with historically marginalized communities.

Response A21-3

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," "Plan Bay Area 2050+ implementation is supported through ongoing coordination with local jurisdictions and other partners, including refinement of regional frameworks and datasets over time..

Comment A21-4

2. Sea Level Rise and Cross-Jurisdictional Climate Resilience

We support the Plan's effort to reduce risks from hazards and specifically strategy (EN1) to adapt to sea level rise; however, the Plan could go further to prioritize the communities that are most at risk. Especially in communities, like San Rafael, where flooding expected in the next 25 years will directly impact equity priority communities, have significant impacts on affordable housing and displacement, and affect the functionality and continuity of regional transportation networks. More could be done at a regional level to align funding for ongoing programs to address these short-term threats. As MTC's own research has demonstrated, the need for resilience investments is significantly larger than existing funding sources; therefore, it is essential that regional funding be directed and prioritized to address the most at-risk communities and that adaptation efforts be integrated into other ongoing investments in transportation, housing, and other initiatives.

Climate resilience considerations must also account for wildfire risk and emergency evacuation capacity. While we recognize that MTC is not a regional wildfire authority, climate change, wildfire risk, and development feasibility are inextricably linked. San Rafael's development opportunities are constrained by topography and climate vulnerability. Portions of San Rafael are located in high fire hazard severity zones with limited ingress and egress, placing heightened importance on transportation networks' evacuation capacity and resilience. For example, the Canal community has repeatedly emphasized its concerns about limited evacuation and egress from the Canal, as there are only three roads in and out, and all of them are lower than the Bay at high tide (and typically have traffic at peak hours). Ongoing multi-million dollar transportation projects that affect these evacuation routes are not accounting for these existing safety risks.

MTC's planning, funding, and investment decisions can play a meaningful role in addressing these challenges – including through support for evacuation routes, multimodal connectivity, system hardening, and complementary mitigation investments that reduce risk and improve safety. Integrating wildfire and evacuation considerations would support safer, more resilient development patterns over the coming decades.

Strengthening these aspects of the Draft Plan and its implementation would materially improve its usefulness to local governments facing near-term climate risks.

Response A21-4

As described in the proposed plan and Draft EIR, Plan Bay Area 2050+ includes strategies related to sea level rise adaptation and regional resilience planning, including environmental strategy EN1, "Adapt to

Sea Level Rise." Impacts from the plan's sea level rise adaptation projects are included throughout the Draft EIR and wildfire and emergency evacuation impacts are included in Section 3.9, "Hazards and Wildfire" of the Draft EIR. As further described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," implementation of resilience strategies would occur over time through coordination with responsible agencies, future programming decisions, and available funding. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment A21-5

3. Growth Forecasts and Policy-Based Assumptions

The City continues to have serious concerns regarding the population and employment growth assumptions reflected in Draft Plan Bay Area 2050+. Based on actual residency and demographic trends and recent employment patterns, we do not believe the projected levels of resident and job growth are realistic for the City of San Rafael.

Draft Plan Bay Area 2050+ relies on a policy-driven forecasting approach that differs materially from the demographic and economic models used by other state agencies. The Draft Plan's population projections diverge significantly from those issued by the California Department of Finance (DOF), the State's official source for population projections, which rely on a cohort-component methodology grounded in observed trends in births, deaths, aging, and net migration. For Marin County, the Draft Plan assumes approximately 23,200 additional households by 2050, whereas DOF projects a population **decline** of 6,437 over the same period. Although the information is not disaggregated by city or town, Central Marin County, which includes San Rafael, is projected to see at 23% increase in the number of households. Similarly, the Plan's employment projections do not reflect recent and ongoing structural shifts in Marin's economy. San Rafael has experienced the departure or consolidation of major employers, such as Autodesk, reflecting broader regional trends toward consolidation, remote and hybrid work, and reduced demand for traditional office-based employment.

We recognize that the Draft Plan's growth assumptions were approved earlier in 2025 as part of the adopted Plan Blueprint, and that revisiting those assumptions at this stage would require extensive re-modeling that is not feasible within the current planning cycle.

However, it is important to clearly acknowledge the implications of relying on growth assumptions that are not aligned with observed demographic and employment trends. While Plan Bay Area 2050+ itself does not directly determine Regional Housing Needs Allocation (RHNA) numbers, future forecasts developed for Plan Bay Area 2060 **will inform** the next RHNA cycle and will carry significant regulatory and legal consequences for local governments.

Accordingly, we strongly request early and close collaboration with MTC as Plan Bay Area 2060 assumptions are developed, including transparent evaluation of alternative growth scenarios such as lower-growth, remote-work, and technology-driven productivity scenarios; clearer articulation of how policy-based forecasts should be interpreted by local jurisdictions; and greater alignment, where feasible, with other state demographic frameworks so that local governments are not required to plan against inconsistent datasets.

Response A21-5

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plans forecasted growth, and for the connection between Plan Bay Area 2050+ and the 7th RHNA Cycle methodology. These

remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A21-6

4. Priority Development Areas, Transit-Oriented Communities, and Housing Element Implementation

As MTC revisits the Priority Development Area (PDA) framework in the coming years, our City Council asks that frameworks reflect recent state housing legislation, evolving Transit-Oriented Communities (TOC) policies, and the realities of local implementation.

In San Rafael, we recognize that PDAs and TOCs will continue to play a central role in accommodating housing growth.

We urge MTC to ensure that regional plans, incentives, and transportation investments are explicitly designed to **support local Housing Element implementation** – including:

- Aligning regional transportation funding with identified Housing Element opportunity sites;
- Supporting infrastructure investments necessary to unlock housing development in constrained or under-resourced areas; and
- Ensuring PDA and TOC policies reflect flood and wildfire risk, evacuation capacity, and climate constraints alongside housing and transit objectives.

Additionally, all communities in San Rafael that are identified for housing growth in the City's certified Housing Element do not qualify as TOCs or fall within other regional program categories that direct MTC transportation and infrastructure funding. Despite this, these communities still need meaningful investments in transportation, utilities, and public services to support new housing. We encourage MTC to consider how regional funding frameworks can more flexibly support housing-supportive infrastructure in communities that may not neatly align with existing programmatic definitions, but are nonetheless essential to meeting regional housing goals.

Response A21-6

As described in "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+," the Draft Plan and Draft EIR reference TOC as an adopted regional policy direction intended to advance Plan Bay Area goals by focusing growth near high-quality transit, and any TOC-related implementation measures tied to funding programs would occur through separate Commission actions and adopted program guidelines. As further described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," Plan Bay Area 2050+ provides a long-range regional framework and supports implementation through coordination with local jurisdictions and other partners, while land use decisions remain under local jurisdiction authority.

With respect to PDAs and TOCs, the proposed plan acknowledges that these geographies play an important role in advancing regional objectives related to housing production, transit access, and greenhouse gas reduction. The commenter's recommendation that PDA and TOC frameworks reflect evolving state housing legislation and local implementation realities is noted and will be considered as MTC and ABAG refine these geographies and related policies in future updates.

The commenter's recommendation to more directly align regional transportation funding and infrastructure investments with Housing Element opportunity sites and implementation needs is also noted and will be considered as future program guidelines and implementation strategies are refined. In addition, the commenter requests greater flexibility to support housing-supportive infrastructure in

communities that may not align with existing program definitions (including areas outside TOCs). MTC and ABAG recognize that jurisdictions may identify Housing Element growth areas that do not correspond to existing regional growth geographies, and this recommendation will be considered in future refinement of funding frameworks and related implementation programs, consistent with applicable requirements and funding program parameters.

Finally, the commenter requests that PDA and TOC policies incorporate flood and wildfire risk, evacuation capacity, and other climate constraints. The comment is noted. MTC and ABAG recognize the importance of integrating resilience considerations into regional planning and implementation frameworks and will consider this recommendation as future PDA/TOC updates and related implementation efforts are advanced.

Comment A21-7

5. Regional Partnership Opportunities and Priority Investments

Finally, we encourage MTC to continue strengthening its role as a regional partner in supporting local economic vitality, equitable access, and climate-aligned transportation investments. This includes opportunities to advance priority projects and initiatives such as:

- Improved Highway 580 transit connections;
- Expanded green transit incentives and zero-emission mobility options; Investments that better connect North Bay communities to the regional core while recognizing distinct geographic and economic conditions; and
- Alignment with regional economic development plans, such as Comprehensive Economic Development Strategies (CEDS)

We believe there is a significant opportunity for MTC's regional planning and funding programs to support local implementation outcomes while advancing shared regional goals more directly.

Response A21-7

The commenter encourages MTC to continue strengthening regional partnership efforts to support local economic vitality, equitable access, and climate-aligned transportation investments. The commenter recommends improved Interstate 580 transit connections, expanded green transit incentives and zero-emission mobility options, better connections between North Bay communities and the regional core, and stronger alignment with regional economic development efforts such as CEDS.

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," Plan Bay Area 2050+ provides a long-range regional policy framework and supports implementation through coordination with local jurisdictions, county transportation agencies, transit operators, and other partners, including through funding programs, technical assistance, and collaborative planning efforts. The commenter's specific recommendations regarding priority investments and partnership opportunities are noted and will be considered as MTC and ABAG refine plan implementation strategies and future funding program priorities.

Comment A21-8

Conclusion

We support the overarching climate, equity, housing, and mobility goals of these regional planning frameworks, and we remain committed to doing our part to address the region's housing and transportation challenges. In central San Rafael alone, 2,700 housing units are at risk of flooding within

the next 25 years, and many are likely to be permanently inundated due to subsidence and sea level rise. Many of these at-risk homes are providing critical housing for low-income renters. Over the past six years, our City Council has committed over $7.3 million in Affordable Housing Trust Fund resources toward affordable housing and has supported the creation or preservation of more than 366 affordable housing units through new construction, acquisition, conversion, and preservation. The City's Housing Element -- certified by the State in June 2023 following extensive research, outreach, and public engagement -- plans for the addition of over 3,200 new affordable housing units in San Rafael.

Given that the cost of producing a single affordable unit in San Rafael often approaches $1 million per unit, sustained local investment and strategic partnerships are essential.

Our comments are intended to clarify local conditions, identify opportunities for improved coordination, and underscore the importance of grounding future regional plans in realistic assumptions that local governments can responsibly implement.

We appreciate the opportunity to comment and look forward to continued partnership with MTC and ABAG as the region moves toward Plan Bay Area 2060.

Response A21-8

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A22 Solano County

Matt Tuggle, PE
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A22-1

To whom it may concern:

Thank you for the opportunity to comment on the Plan Bay Area 2050+ Plan and Draft EIR. Solano County has the following comments and concerns regarding the Plan and Draft EIR:

Response A22-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A22-2

Agricultural Resources

Given Solano County's substantial agricultural economy, a more thorough cumulative analysis is necessary. There is no evaluation of agricultural impacts outside the growth footprint. Unincorporated agricultural lands are vulnerable to incremental and cumulative development such as edge effects, fragmentation, and infrastructure conflicts are likely outside designated Growth Geographies.

Insufficient Evaluation of Indirect Agricultural Impacts

Although the Draft EIR identifies potential conversion of agricultural land and its impacts (Impacts AGF-1 and AGF-3), it does not adequately assess the indirect or cumulative impacts that can significantly affect agricultural viability, including:

- Edge effects such as trespass, pesticide-use conflicts, urban/agricultural interface issues, and noise.
- Loss of agricultural efficiency associated with changes in field access, vehicle circulation, and proximity to new urban uses.
- Extent of potential spill-over effects, areas of likely occurrence, and assessment of impacts specific to counties with substantial farmland, including Solano County.

Response A22-2

The proposed plan's land use strategies could affect land use patterns through increases to residential density and nonresidential intensity within the plan area. However, the proposed plan's land use growth footprint is concentrated in designated Growth Geographies, which are primarily located in urbanized areas, supporting infill development, including locally nominated Priority Development Areas, Priority Production Areas, High Resource Areas, and Transit Rich Areas. Approximately 73% of the proposed plan would occur within these Growth Geographies, which would reduce the effects of the plan on agricultural resources because the proposed development pattern would generally occur on already developed land. Impact AGF-3 (Draft EIR pages 3.3-22 and 3.3-23) and Impact CUM-2 (Draft EIR page 5-12) of the Draft EIR evaluate the indirect and cumulative impacts related to agriculture and forestry resources. Impact AGF-3 considers edge effects, changing agricultural practices, and spill-over effects. As included in Impact AGF-3:

> Lands that remain agricultural but located adjacent to urban uses, may feel pressure to develop, as nearby land values increase or as nuisances from urban development spread to agricultural lands. In addition, urban uses, especially newly urbanized areas, can lead to pressure on adjacent farms to change their farming practices (e.g., changing schedules to reduce noise or altering the extent or method of fertilizer and pesticide spraying). Further, expanded transportation infrastructure capacity and the implementation of sea level rise adaptation projects could remove obstacles to growth in existing agricultural areas.

To reduce the indirect impact to agricultural resources, Mitigation Measure AFG-3 is proposed. Mitigation Measure AGF-3 would require avoidance or compensation for converted agricultural and forest lands and require acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. However, the proposed mitigation measures may not provide adequate compensation to reduce the impact to less-than-significant level. Therefore, the impact is determined to be significant and unavoidable.

Regarding providing an assessment of impacts specific to counties with substantial farmland, the programmatic analysis in the Draft EIR does not allow for a precise description of proposed plan impacts related to agricultural resources because details related to the location, size, design, or setting of specific projects are unknown. Therefore, a more detailed and meaningful evaluation could not occur at this time. At the program level, identifying specific indirect effects associated with a specific project is not possible. Therefore, the Draft EIR does not address impacts at a project-specific level, nor does it address impacts specific to a city or county covered by the proposed plan. Such environmental analyses will occur, as appropriate, for specific program implementation or development and infrastructure projects. The Draft EIR includes analysis and feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, as appropriate for a programmatic

analysis under CEQA. The programmatic analysis provided in the Draft EIR is adequate and appropriate under CEQA. Please refer to "Master Response 4: Program Level Document" regarding program level analysis.

Cumulative impact related to agriculture and forestry resources are discussed on page 5-12 of the Draft EIR. The Draft EIR determines that implementation of the proposed plan would contribute considerably to agriculture and forestry resources impact and the cumulative impact would be significant and unavoidable. Please refer to Response A22-4 regarding insufficient cumulative analysis.

Comment A22-3

Lacking in Analysis of Agricultural Viability or Economic Sustainability

The Draft EIR focuses primarily on direct farmland conversion acreage. It does not evaluate the long-term viability of remaining agricultural operations, including:

- Acreage reductions caused by transportation or sea-level-rise adaptation infrastructure.
- Impacts to agricultural service providers, processing facilities, or water-dependent agricultural supply chains.

Response A22-3

As discussed in Impact AGF-1 of the Draft EIR, approximately 932 acres of the proposed plan's sea level rise adaptation projects footprint would overlap with Farmland (530 acres of Prime Farmland, 42 acres of Farmland of Statewide Importance, and 360 acres of Unique Farmland). Approximately 200 acres of the proposed plan's transportation projects footprint would overlap with Farmland (130 acres of Prime Farmland, 40 acres of Farmland of Statewide Importance, and 30 acres of Unique Farmland). Please refer to Tables 3.3-5 and 3.3-7 of the Draft EIR for summaries of Farmland acreage impacts associated with proposed plan's sea level rise adaptation projects footprint and transportation projects footprint, respectively.

As concluded in Impact AGF-1, implementation of the proposed plan would have a potentially significant impact related to converting Farmland, lands zoned for agriculture, or lands under Williamson Act contract to urban uses. Implementation of Mitigation Measure AGF-1 would reduce the potentially significant impact related to the conversion of Farmland, lands zoned for agriculture, or lands under Williamson Act contracts to other uses because it would require avoidance or compensation for converted lands. However, the mitigation would not ensure that the impact would be reduced to a less-than-significant level. Accordingly, this impact is determined to be significant and unavoidable.

Regarding providing specific impact discussion, the analysis in the Draft EIR is programmatic, and as a result, specific detail regarding the location of projects and potential impacts on specific agricultural service providers, processing facilities, or water-dependent agricultural supply chains are not known at this time. The Draft EIR includes analysis and feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, as appropriate for a programmatic analysis under CEQA. The programmatic analysis provided in the Draft EIR is adequate and appropriate under CEQA. Please refer to "Master Response 4: Program Level Document" regarding program level analysis.

Comment A22-4

Incomplete Cumulative Impact Evaluation

The Draft EIR concludes cumulative agricultural impacts are significant, but does not present:

- Identification of agricultural regions most at risk from combined Plan Bay Area 2050+ (Plan) growth, flood adaptation infrastructure, and transportation investments.
- On how the Plan interacts with county-level General Plan, agricultural preservation programs, or agricultural zoning frameworks.
- An evaluation of agricultural impacts outside the growth footprint.

Response A22-4

As discussed in Section 5.4.1, "Methodology," the plan area encompasses 4.4 million acres and includes nine counties and 101 cities. The proposed plan is a cumulative plan by design and therefore the environmental analysis of the proposed plan presented throughout this EIR is a cumulative analysis compliant with the requirements of CEQA and the CEQA Guidelines (see pages 5-9 and 5-10 of the Draft EIR). Section 5.4 of the Draft EIR, "Cumulative Impacts," examines impacts associated with implementation of the proposed plan, plus implementation of projected development for jurisdictions adjoining the Bay Area, to assess the potential for cumulative impacts from growth extending beyond the region. The cumulative effects on agricultural resources are presented under the subheading "Agriculture and Forestry Resources," on page 5-12 of the Draft EIR. Because implementation of the proposed plan has the potential to result in conversion of agricultural lands and forestland to urban uses (as discussed in Section 3.3 of the Draft EIR) and because development pursuant to other local and regional planning efforts within the cumulative impact analysis area could also have impacts on agriculturally designated land and forestry resources, the cumulative impacts were determined to be potentially significant, meaning that the project would make a considerable contribution to a cumulative impact.

Section 3.3 of the Draft EIR identifies the agricultural impacts associated with the land use growth footprint, sea level rise adaptation projects footprints and transportation projects footprint by county. Impact AGF-1 in Section 3.3 evaluates impact related to conversion of agricultural land to non-agricultural use and concludes that implementation of the proposed plan would result in a potentially significant impact. Implementation of Mitigation Measure AGF-1 would reduce the potentially significant impact of conversion of agricultural land but not to a less-than-significant level. Impact AGF-3 in Section 3.3 evaluates the indirect impact associated with conversion of agricultural land outside of the plan area and concludes the impact would be potentially significant. Regarding providing specific impact discussion associated with county level programs, because this is a programmatic analysis, it does not allow for a precise description or specific details regarding the location of projects and potential impacts on county-level general plan, agricultural preservation programs, or agricultural zoning frameworks. The Draft EIR includes analysis and feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, as appropriate for a programmatic analysis under CEQA. The programmatic analysis provided in the Draft EIR is adequate and appropriate under CEQA. Please refer to "Master Response 4: Program Level Document" regarding program level analysis.

Comment A22-5

<u>Stronger Emphasis on Agricultural Lands</u>

While PBA2050 attempts to place a focus on strategies related to Transportation, Housing, Economy and Environment, it should seek to include agricultural preservation as a more important component of long-term growth. The continued efforts to increase housing options and job creation for the state's population continues to put pressure on agricultural resources. PBA2050 should more proactively place an emphasis that increasing housing and job creation should not be done at the risk of losing the Bay Area's valued agricultural lands.

Response A22-5

The plan's land use strategies, together with designated Growth Geographies, work in tandem to focus housing and job growth into existing communities that are well served by the transportation network—especially those with strong transit access—as well as in communities with well-resourced schools and easy access to jobs, parks, and other amenities. This approach "focuses growth" while placing less development pressure on the region's open spaces and agricultural lands. The proposed plan also supports maintaining urban growth boundaries and focusing new development within the existing footprint or areas otherwise suitable for growth, as established by local jurisdictions. These policies and strategies are intended to accommodate forecasted growth while reducing pressure for outward expansion into agricultural and open space areas.

Comment A22-6

Protection and Investment into Agricultural Lands

Per SB375, MTC shall consider financial incentives for cities and counties that have resource areas or farmland, as defined in Section 65080.01, for the purposes of, for example, transportation investments for the preservation and safety of the city street or county road system and farm to market and interconnectivity transportation needs. MTC shall also consider financial assistance for counties to address countywide service responsibilities in counties that contribute towards the greenhouse gas emission reduction targets by implementing policies for growth to occur within their cities.

The PBA2050 and the Draft EIR do not ensure that the requirements of SB375 are being met for the rural agricultural areas. Specifically, PBA2050 continues to prioritize investment into urban centers without adequate consideration for the necessity of enhancing agricultural access and viability. Rural farm to urban fork should prioritize the necessity of farm-to-market routes. Consumption of regional agricultural products, locally and regionally, limits GHG impacts related to interstate/global shipping, trucking, logistics, and processing.

Response A22-6

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. SB 375 is part of California's overall strategy to reach GHG emissions reduction goals as set forth by Assembly Bill 32, SB 32, AB 1279 and Executive Order B-30-15. The CEQA streamlining benefits provided by SB 375 are some of the mechanisms used to create incentives for the development of land use projects that will help the State achieve its climate goals. Although the Draft EIR provides lead agencies with CEQA streamlining benefits for certain projects, neither the proposed plan nor the Draft EIR limit in any way the land use authority of any city or county, including the ability to adopt and implement policies to preserve agricultural lands. Even after the proposed plan is adopted by MTC and ABAG, the lead agencies for future land use development projects retain the discretion to (1) carry out or approve projects that are not consistent with the plan, (2) exercise their discretion to deny approval of projects even if they are consistent with the plan, and (3) reach environmental conclusions and/or adopt mitigation measures that differ from those identified in this EIR. In short, the proposed plan, if adopted, would be advisory and not binding at the local level. The Bay Area's cities, towns, and counties maintain control of all decisions to adopt plans and to permit or deny development projects.

Comment A22-7

Housing

Is PBA2050 anticipated to inform the 7th RHNA Cycle methodology? If so, the Plan needs to ensure that new housing continues to be directed to the inner Bay Area counties and cities even more than the previous PBA version. Outlying counties such as Solano struggle to accommodate its RHNA obligations

while maintaining community separators and keeping important agricultural areas from premature conversion to residential and commercial uses.

Jobs-Housing Balance:

The Solano County fact sheet anticipates a 5% growth rate in households and a 26% growth rate in jobs. Traditionally, a 1.5:1 job to household ratio is considered strong. As such, the fact sheet's 5.2:1 projection seems overly aggressive. The County supports efforts to increase job production in Solano County as long as the "job fit" matches the affordability of the housing. MTC/ABAG should support financial resources and incentives to businesses seeking to locate in Solano County.

PBA2050 continues to place an emphasis on housing development near major transit, which the County supports. However, other methods to decrease transportation times and miles traveled should be seriously considered. Placing livable wage jobs near already existing housing area will also reduce the need to commute to the inner Bay Area for job access.

Response A22-7

Please refer to "Master Response 1: Regional Growth Forecast," regarding details on the connection between Plan Bay Area 2050+ and the 7th RHNA Cycle methodology..

With respect to the distribution of growth and land use patterns, the proposed plan includes strategies intended to reduce VMT per capita and greenhouse gas emissions by focusing a greater share of housing and job growth in locations that improve access to transit and services, while also advancing environmental goals including protection of natural and working. As shown in Table 3.5-11 of the Draft EIR (page 3.15-27), the proposed plan's strategies would help reduce regional daily vehicle trips per capita by 13% and VMT per capita by 5%. The proposed plan also includes economic and workforce strategies that address job growth, economic development, and jobs-housing connections, including approaches intended to improve job accessibility and support more balanced regional growth patterns.

Comment A22-8

Hydrology

Absence of Quantitative Runoff or Drainage Modeling

The Draft EIR acknowledges that increases in impervious surfaces can alter stormwater runoff, groundwater recharge, and flood flows. However, the hydrologic analysis is based on generalized regulatory compliance rather than regional quantifiable evaluation. We understand that the Plan does not provide any specific project; thus, the runoff and drainage modeling analysis may be estimated based on regional projected assumptions in growth footprints.

Given the scale of forecasted growth and Solano County's mix of urban and agricultural drainage systems, quantitative hydrologic modeling on a regional level or watershed level would be helpful for a CEQA level assessment.

Response A22-8

Impacts to stormwater runoff, groundwater recharge, and flood flows are included in Section 3.10, "Hydrology and Water Quality," of the Draft EIR. The programmatic analysis in the Draft EIR does not allow for detailed hydrological modeling at the city or county scale because details related to the location, size, design, or setting of specific projects are unknown and, therefore, a more detailed and meaningful evaluation could not occur at this time. At the program level, identifying specific hydrologic impacts associated with projects that may occur in Solano County is not possible and would render a detailed hydrological modelling effort impractical. Therefore, the Draft EIR does not address impacts at a project-

specific level, nor does it address impacts specific to a city or county covered by the proposed plan. Such environmental analyses will occur, as appropriate, for specific program implementation or development and infrastructure projects. Additionally, cumulative analysis related to stormwater runoff, groundwater recharge, and flood flows will occur for specific future development projects under the plan. Please refer to "Master Response 4: Program Level Document" regarding CEQA's requirements for the programmatic assessment of the potential impacts of an overall plan or other program.

Comment A22-9

Limited Evaluation of Groundwater Recharge Impacts

Although the Draft EIR includes future constraints on groundwater recharge, it does not analyze any geographic overlap between Growth Geographies and mapped recharge areas, nor the associated impacts. Similarly, the potential for regional sea level rise adaptation structures, particularly levees and seawalls, to alter shallow groundwater gradients or impede inland drainage is not addressed.

These issues are particularly important for Solano County, which relies on a combination of surface water and groundwater resources for both urban and agricultural uses.

Response A22-9

Impact HYDRO-2 in Section 3.10, "Hydrology and Water Quality," of the Draft EIR evaluates region-wide impacts related to groundwater recharge. Table 3.10-5 of the Draft EIR quantifies the acreage of the forecasted land use growth footprint within groundwater basins by county, including Solano County. The Draft EIR explains that approximately 77 percent of growth would occur in urbanized areas that are largely impervious and served by existing stormwater drainage systems. The Draft EIR further explains that the proposed plan would guide the forecasted land use growth footprint away from undeveloped locations that may be well suited to facilitating groundwater recharge. In addition, the Draft EIR states that existing regulatory requirements at the local, State, and federal level include measures to minimize any increases in off-site stormwater runoff by encouraging on-site infiltration, which would effectively minimize the potential reduction in groundwater recharge to an acceptable level.

Similarly, Table 3.10-6 of the Draft EIR quantifies the acreage of the sea level rise adaptation projects footprint within groundwater basins by county and evaluates the potential for these projects, including levees and sea walls, to affect groundwater recharge and drainage conditions. Although individual adaptation projects could result in localized increases in impervious surfaces, the Draft EIR concludes that these effects would not substantially decrease groundwater supplies or interfere with groundwater recharge because these projects would have relatively small footprints and may largely replace existing structures. Please refer to "Master Response 4: Program Level Document" regarding CEQA's requirements for the programmatic assessment of the potential impacts of an overall plan or other program.

In accordance with existing regulations, future projects would be subject to site-specific review to ensure compliance with regulatory requirements governing groundwater resources. For example, future projects would be required to incorporate low-impact development strategies and stormwater best management practices to encourage on-site infiltration and offset increases in off-site stormwater runoff, in accordance with RWQCB Basin Plans, National Pollutant Discharge Elimination System permitting, and local stormwater requirements. In addition, future projects would be subject to Sustainable Groundwater Management Act regulations governing the sustainable use of groundwater resources. Accordingly, the Draft EIR adequately identifies and discloses the potential for implementation of the proposed plan to result in impacts related to groundwater recharge and the sustainable use of groundwater resources.

Comment A22-10

Limited Analysis of Flood Risk

The Draft EIR relies heavily on future permitting to ensure no adverse effects and does not analyze potential for floodwater impacts to adjacent downstream or upstream communities and interactions between sea level rise barriers and projected groundwater rise, which can exacerbate flooding and water quality concerns in interior low-lying areas.

Given Solano County's vulnerability to tidal, fluvial, and overland flood pathways, additional analysis is warranted. Furthermore, to ensure alignment with regional resilience objectives, the Plan should be closely coordinated with the Solano Bayshore Resiliency Project, which Solano County is currently undertaking to fulfill its mandated Regional Shoreline Adaptation Plan.

Response A22-10

Impact HYDRO-5 in Section 3.10, "Hydrology and Water Quality," of the Draft EIR evaluates the potential for the proposed plan to alter drainage patterns in a manner that could impede or redirect flood flows. Tables 3.10-8 through 3.10-10 of the Draft EIR quantify the acreage of the forecasted land use growth footprint, sea level rise adaptation project footprint, and transportation project footprint within Federal Emergency Management Agency 100- and 500-year flood hazard zones by county, including Solano County. The Draft EIR acknowledges that structures that impede flood flows can potentially raise flood levels, causing more severe flooding impacts on existing vulnerable areas or exposing new areas that would not have previously flooded to flooding impacts.

The Draft EIR explains that development within floodplains is subject to local, State, and federal regulations and permitting requirements to ensure that projects are reasonably safe from flood damage and do not result in physical damage to other properties. Applicable regulations include Executive Order 11988 (for federally funded projects), the National Flood Insurance Program, the National Flood Insurance Act, the Cobey-Alquist Floodplain Management Act, and local ordinances, including those adopted by Solano County. Sea level rise adaptation projects are also subject to oversight and permitting by agencies such as the California Coastal Commission, BCDC, US Army Corps of Engineers, San Francisco Bay RWQCB, and US Environmental Protection Agency. Any potential for these projects to alter existing drainage patterns in a manner that adversely affects conditions outside of the area they are designed to protect would be evaluated and mitigated both through project specific CEQA analysis, as required, and through the permitting process. Permitting would ensure compliance with State and federal regulations that would reduce impacts related to hydrology. Permitting is a reasonable mechanism for ensuring that impacts are minimized because project sponsors are legally required to obtain permits for their projects. Permitting under the above-listed regulatory schemes is feasible and effective mitigation.

Impact HYDRO-6 in Section 3.10, "Hydrology and Water Quality," of the Draft EIR addresses the potential for project inundation to risk the release of pollutants. Existing regulations guide growth away from hazardous areas and would address the management and control of pollutants. Regulations related to the management of hazardous materials are described further in Section 3.9, "Hazards and Wildfire." Sea level rise adaptation projects are expected to reduce the potential for inundation, further limiting the likelihood of pollutant release.

Accordingly, the Draft EIR adequately identifies and discloses potential flood risks and related water quality impacts associated with implementation of the proposed plan. The analysis demonstrates that impacts related to altered flood flows and the release of pollutants due to inundation would be less than significant through compliance with existing regulatory requirements, permitting processes, and project-level review.

Comment A22-11
Climate Change

Outdated Climate Science

It appears that the Draft EIR references the State of California Sea Level Rise Guidance (OPC, 2018 Update) as the basis for its sea level rise (SLR) assumptions. The best available climate science presented in the OPC, 2024 Update should be used for the Final EIR analysis. The magnitudes of SLR estimates are significant between the 2018 Update and the 2024 Update. The Final EIR should also clearly specify which SLR projections from the OPC 2024 Update Guidance were used for the evaluation, since this was not clearly defined in the Draft EIR.

Response A22-11
Please refer to Response to A7-2.

Comment A22-12
Inadequate Climate Change Impact Analysis

While it acknowledges climate change drivers and the need for adaptation, the Draft EIR does not quantify,

- SLR induced flooding for the Plan's growth areas.
- Climate-driven hydrologic changes (runoff, baseflow, storm intensity).
- Climate-change impacts on water quality such as pollutant mobilization during larger storms.
- Climate-driven groundwater rise, despite citing it.

Generally speaking, the Draft EIR does not estimate or provide a range of values for key climate-related impacts, such as future hazard conditions and how they may affect specific growth areas, transportation projects, or natural resources. The Draft EIR approach places primary reliance on future project-level CEQA review and regulatory compliance, rather than integrating region-based climate modeling that would provide a broader context or climate risks for evaluating individual projects in the future.

Response A22-12
The effects of the environment on a project, such as the impacts of SLR on the plan's growth areas, are outside of the scope of CEQA unless the project would exacerbate an existing adverse condition, as concluded by the California Supreme Court (see *California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369, 377 ["we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."]). Changes to the State CEQA Guidelines to reflect this decision were adopted on December 28, 2018. Accordingly, the EIR analysis generally does not address the impacts of existing environmental conditions on a project's future users or residents. However, when a proposed project risks exacerbating environmental hazards or conditions that already exist, the EIR analyzes the potential impact of such hazards on future residents or users. During operation, the proposed plan would have long-term beneficial effects related to reducing GHG emissions in the transportation sector, one of the key sectors identified by CARB in the 2022 Scoping Plan for achieving the states climate goals. Therefore, contributing to the achievement of these goals through implementation of the plan would help address a key climate change driver. As described on page 3.6-45 of Section 3.6, "Climate Change, Greenhouse Gases, and Energy" of the DEIR,

> "With implementation of Strategy EN8 and Strategy EN9, the proposed plan is expected to result in a 21% decrease in per capita CO_2 emissions from 2005 levels by 2035, exceeding the SB 375 target of 19%. While this decrease in emissions is attributable to numerous factors, the proposed plan's integrated land use and transportation strategies that result in a land use growth footprint that focuses growth into higher-density locations near transit services are particularly effective, as they encourage the shift from driving to public transit and active modes of transportation. This "focused growth" approach allows more efficient use of the existing transportation infrastructure.

The Draft EIR addresses emissions from transportation. As shown on Table 3.6-15 on page 3.6-45 of the Draft EIR per capita transportation-related emissions are projected to decrease with implementation of the proposed plan, in accordance with SB 375. Additionally, the transportation network improvements and programs under the proposed plan would, in conjunction with the land use growth footprint, result in a regional reduction in per capita VMT for passenger and light-duty vehicles. Therefore, the proposed plan would not exacerbate transportation emissions. As described in Section 2, "Project Description" of the Draft EIR the proposed plan focuses growth in existing communities along the existing transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This approach helps to achieve the region's vision by building upon established community characteristics and leveraging existing infrastructure while reducing effects on areas with less development. The proposed plan's approach to focused growth results in less than 1% of the region's total land area being affected by the land use growth footprint for the plan. Therefore, the plan would not exacerbate climate hazards associated with natural resources.

For these reasons, the proposed plan is, according to CARB, is consistent with the climate goals of the 2022 Scoping Plan and would have beneficial effects related to mitigating the effects of climate change.

Comment A22-13
Transportation

Per SB 375, MTC shall consider financial incentives for cities and counties that have resource areas or farmland, as defined in Section 65080.01, for the purposes of, for example, transportation investments for the preservation and safety of the city street or county road system and farm to market and interconnectivity transportation needs. MTC shall also consider financial assistance for counties to address countywide service responsibilities in counties that contribute towards the greenhouse gas emission reduction targets by implementing policies for growth to occur within their cities.

The PBA2050 and the Draft EIR do not ensure that the requirements of SB375 are being met for the rural agricultural areas. Specifically, PBA2050 continues to prioritize investment into urban centers without adequate consideration for the necessity of enhancing agricultural access and viability. Rural farm to urban fork should prioritize the necessity of farm-to-market routes. Consumption of regional agricultural products, locally and regionally, limits GHG impacts related to interstate/global shipping, trucking, logistics, and processing.

Response A22-13

Please refer to Response A22-6.

Comment A22-14
Gaps in Growth Geographies

The Draft EIR does not meaningfully consider or evaluate land use changes in unincorporated areas of Solano County. The Plan focuses almost entirely on regional "Growth Geographies," which, as shown in Figure 2.5, are located exclusively within the county's incorporated urban areas. However, portions of

unincorporated Solano County have the potential to be designated or developed as future "Growth Geographies." By omitting these areas from the Plan's land use assumptions, the Draft EIR provides no analysis of the potential environmental impacts associated with their future development.

Solano County is in the process of completing the Solano County Strategic Initiative for Agriculture, which includes an agricultural economic development plan and assessments of agricultural infrastructure needs and land use planning policies. As a result, additional areas of growth may be proposed within the unincorporated lands. Final EIR should clarify how unincorporated areas are treated and considered on impacts, disclose any indirect or cumulative land use pressures that may arise from the Plan, and evaluate potential effects on rural communities and agricultural operations as part of the cumulative impact evaluation.

Response A22-14

The proposed plan's Growth Geographies are the geographic areas where land use strategies were applied, intended to guide where future growth in housing and jobs would be focused; they are not intended to estimate areas of potential land conversion. As defined in Section 2.3.4, "Proposed Plan Growth Geographies," of the Draft EIR:

> The proposed plan designates specific geographic areas—known as Growth Geographies—in order to guide where future household and job growth would be focused under the proposed plan's strategies over the next 25 years. The Growth Geographies are a mix of a) areas designated by local jurisdictions—PDAs and PPAs; and b) areas defined by criteria related to transit service and access to opportunity—TRAs and HRAs. Although future development is not solely limited to Growth Geographies, these places are likely to accommodate the bulk of new homes and jobs in Plan Bay Area 2050+, similar to Plan Bay Area 2050. The proposed plan's approach for leveraging strategies remains "focused growth" in existing communities along the existing transportation network, as evidenced by the descriptions and general locations of the Growth Geographies described below. This focused growth approach helps to achieve key regional economic, environmental, and equity goals by building upon existing community characteristics and leveraging existing infrastructure while reducing effects on areas with less development.

Please refer to Section 2.3.4 of the Draft EIR for a discussion of Growth Geographies and Growth Geography criteria adopted by MTC and ABAG. Please refer to Response A22-16 related to Solano County's Strategic Initiative for Agriculture and cumulative agricultural impacts.

Comment A22-15

Inadequate Water Supply and Bay-Delta Regulatory Analysis

The Draft EIR overlooks the critical connection between groundwater availability in Solano County and Bay-Delta hydrology. Many unincorporated and urban communities in Solano County rely on groundwater that is directly influenced by Delta surface water levels, tidal conditions, and regional water supply reliability, such as the Solano Project. Climate change and potential Bay-Delta Plan flow requirements based on the unimpaired flow scenario proposed by the State Water Resources Control Board could reduce surface water deliveries and increase groundwater pumping, heightening risks of depletion, subsidence, and salinity intrusion. Because the Draft EIR does not evaluate these foreseeable interactions in light of future development, it fails to provide adequate CEQA analysis and projections of long-term water supply vulnerabilities and impacts.

Response A22-15

Impact PUF-2 in Section 3.14, "Public Utilities and Facilities," of the Draft EIR evaluates whether water providers would have sufficient water supplies available to serve the proposed plan's forecasted land use

growth footprint, sea level rise adaptation projects, transportation projects, and other reasonably foreseeable future development during normal, single dry, and multiple dry years. The analysis relies on currently adopted Urban Water Management Plans (UWMPs) prepared by water suppliers serving the plan area, including the Solano County Water Agency.

As required by State law (Water Code Section 10631), UWMPs must evaluate water supply reliability with consideration of local hydrology, drought conditions, and the effects of climate change on water supply availability and demand. The Draft EIR discloses that the Solano County Water Agency and other major regional water suppliers have forecasted shortages in long-term supplies during a single dry years and multiple dry years that will need to be met through additional water conservation, reuse, and recycling, and securing additional water supply sources. Accordingly, the Draft EIR discloses the potential for long-term water supply vulnerabilities and constraints, including those that could increase reliance on groundwater during periods of reduced surface water availability.

Where applicable, future development projects would be required to comply with SB 610 (Water Code Sections 10910–10915) and SB 221 (Water Code Section 10912), which require preparation of Water Supply Assessments or Water Supply Verifications demonstrating that sufficient water supplies are available prior to project approval. As discussed in Section 3.14.2, "Regulatory Setting, of the Draft EIR, projects relying on groundwater as a water source must provide additional information in these assessments to address consistency with groundwater management requirements under the Sustainable Groundwater Management Act. The Draft EIR includes mitigation measures that require coordination with water suppliers, project-level CEQA review, implementation of water conservation approaches, water budgeting, and use of recycled water for non-potable purposes, where feasible. However, the Draft EIR concludes that the water supply impact associated with implementation of the proposed plan remains significant and unavoidable because of the uncertainty of future water supply availability.

Accordingly, the Draft EIR adequately identifies and discloses impacts related to water supply, including consideration of groundwater resources, long-term supply reliability under drought conditions, and with consideration of climate change.

Comment A22-16

Solano County is in the process of completing the Solano County Strategic Initiative for Agriculture, which includes an agricultural economic development plan and assessments of agricultural infrastructure needs and land use planning policies. As a result, additional areas of growth may be proposed within the unincorporated lands. Final EIR should clarify how unincorporated areas are treated and considered on impacts, disclose any indirect or cumulative land use pressures that may arise from the Plan, and evaluate potential effects on rural communities and agricultural operations as part of the cumulative impact evaluation.

Response A22-16

The Draft EIR addresses regional impacts related to agricultural resources at a programmatic level (Section 3,3). The programmatic analysis in the Draft EIR does not allow for a precise description of project details related to agricultural resources because details related to the location, size, design, or setting of specific projects are unknown and, therefore, a meaningful evaluation detailing impacts on specific rural communities and agricultural operations could not occur at this time. The Draft EIR generally evaluates the impacts of the proposed plan by analyzing how the footprints of the land use growth, sea level rise adaptation projects, and transportation projects intersect with the agriculture resources cross the nine Bay Area counties. The unincorporated areas are considered in Tables 3.3-3 (page 3.3-15), 3.3-5 (page 3.3-17) and 3.3-7 (page 3.3-18) of the Draft EIR when evaluating the acreage of land use growth, sea level rise adaptation projects, and transportation projects footprints within agricultural land in the nine counties.

Indirect impacts are discussed under Impact AGF-3 of the Draft EIR (pages 3.3-22 and 3.3-23), which evaluates the impacts related to pressures on adjacent farms due to implementation of the proposed plan.

As discussed in Section 5.4.1 of the Draft EIR, "Methodology," the proposed plan is a cumulative plan by design and therefore the Draft EIR analyzes cumulative impacts throughout Sections 3.2 through 3.15. Nevertheless, Section 5.4 of the Draft EIR, "Cumulative Impacts," examines impacts associated with implementation of the proposed plan, plus implementation of projected development for jurisdictions adjoining the Bay Area, to assess the potential for cumulative impacts from growth extending beyond the region. Cumulative impacts related to agriculture resources are presented under the subheading "Agriculture and Forestry Resources" on page 5-12 of the Draft EIR.

Comment A22-17

We appreciate that the Plan Bay Area process and understand the need for a broad community approach for the vision. As a county that enacted and maintained an orderly growth initiative for over 40 years, we ask that you take greater consideration for the rural and small agencies that have often been left out of the urban-focused planning and funding of the last decade.

We look forward to your response to our concerns. Please call me at 707-784-6072 if you have any questions regarding our comments.

Response A22-17

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A23 City of Cupertino

Kitty Moore, Mayor
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A23-1

Dear Executive Director and Board Leadership:

On behalf of the City of Cupertino, please find enclosed a letter from former Mayor Liang Chao transmitting the City Council's formal comments on the Draft Plan Bay Area 2050+ and the Draft Environmental Impact Report (Draft EIR). The enclosed letter was approved by the City Council on December 2, 2025, during Mayor Liang Chao's term. As the current Mayor, I support and am submitting the letter consistent with the City Council's action.

The City Council respectfully requests a clear and detailed explanation of the substantial disparity between the population and employment projections used in the Draft Plan Bay Area 2050+ and those published by the California Department of Finance (DOF) and its Demographic Research Unit (DRU). In particular, we would like clarification regarding the methodological basis for MTC/ABAG's significantly higher regional growth assumptions, the policy rationale for diverging from the State's official projections, and how this divergence is reconciled with long-term demographic trends, migration patterns, and structural economic changes.

The City of Cupertino appreciates the opportunity to participate in this regional planning process and looks forward to MTC and ABAG's response, including a detailed explanation of the forecasting approach and how alternative, lower-growth scenarios were evaluated.

Response A23-1

Please refer to "Master Response 1: Regional Growth Forecast" for further discussion of forecasting methods and differences between Plan Bay Area 2050+ projections and projections prepared for other purposes (e.g., DOF).

The Draft EIR uses the adopted Plan Bay Area 2050+ forecast consistently across the proposed plan and alternatives to support comparative program-level CEQA analysis. Please refer to "Master Response 3: Plan Alternatives" regarding consistency for the three alternatives. The Draft EIR is not intended to determine whether any individual forecast is "correct," but rather to evaluate the potential environmental impacts associated with implementing the proposed plan and alternatives under a consistent analytical framework.

Comment A23-2

Dear MTC and ABAG Board Members:

The City Council of Cupertino appreciates the opportunity to comment on the Draft Plan Bay Area 2050+ and its accompanying Draft Environmental Impact Report (Draft EIR). As local elected officials responsible for public safety, fiscal stewardship, infrastructure planning, and environmental protection, we have substantial concerns that the Draft Plan relies on an overstated population and employment forecast, and that the Draft EIR does not adequately analyze or mitigate the resulting environmental, public safety, and infrastructure impacts.

Response A23-2

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A23-3

Specifically, our concerns center on:

1. The Draft Plan's inflated and non-standard regional growth forecast, which diverges sharply from the State's official projections and does not account for potential reductions in jobs due to the impact of Artificial Intelligence (AI) and increased out-migration driven by demonstrated trends in remote or gig work; and

2. The Draft EIR's reliance on mitigation measures that are voluntary, deferred, non-enforceable, and dependent on optimistic assumptions about infrastructure expansion—resulting in numerous impacts remaining Significant and Unavoidable (SU).

3. The Draft Plan's and Draft EIR's dependence on major future regional, state, and federal funding streams that have not been secured, creating substantial funding risks and unfunded local obligations for the infrastructure, public services, and hazard-mitigation measures required to support the Plan's growth assumptions.

Response A23-3

Please refer to Responses A3-2 through A3-4.

Comment A23-4

Throughout the Draft EIR, mitigation is deferred to voluntary actions by local jurisdictions, relies on non-binding guidance ("where feasible"), presumes infrastructure expansion under optimistic conditions, and lacks measurable performance standards. As a result, the Draft EIR itself acknowledges that many impacts remain Significant and Unavoidable (SU) unless every jurisdiction independently implements the recommended measures—an approach that does not meet the feasibility or enforceability requirements of the California Environmental Quality Act (CEQA).

Response A23-4

Please refer to Response A3-5.

Comment A23-5

Our concerns fall into six primary categories:

1. The Growth Forecast Is Overstated and Uses a Non-Standard Modeling Approach

The Draft Plan's demographic assumptions significantly exceed State forecasts:

- The Draft Plan projects 9.6 million residents in 2050, an increase of +1.84 million people—about 4.6 times the California Department of Finance (DOF) projected increase of approximately +0.40 million.
- In percentage terms, the Draft Plan assumes a 24% regional population growth rate, compared to the DOF's much lower 5.2% projection.

In addition to overstating regional growth, the Draft Plan's assumptions are out of alignment with statewide demographic trends. According to the DOF/Demographic Research Unit (DRU),

- California as a whole is projected to grow by only about +1.3 million residents through 2050.
- Under the Draft Plan, the Bay Area alone would account for +1.84 million residents—nearly double the State of California's total expected population increase.

These inconsistencies raise serious concerns about the plausibility of the Draft Plan's regional assumptions.

The Plan uses a policy-driven economic model (REMI), along with 2020 Census data, in which population is derived from assumed job levels rather than demographic fundamentals. This approach does not adequately incorporate major structural shifts in the Bay Area economy, including:

- Sustained out-migration driven by remote work and the gig economy, reducing long-term residential demand.
- Office vacancy rates approaching 30%, signaling reduced demand for commercial space and slower office-based employment growth.
- Workforce reductions from AI-driven automation in key white-collar sectors, lowering future job and population growth.

Because the growth forecast drives Regional Housing Needs Allocation (RHNA) requirements, CEQA baselines, transportation modeling, and infrastructure planning, reliance on an inflated forecast risks significant regional planning misalignment.

Inflated forecasts also create a risk of "paper demand": developers will not build units for which no real market exists, yet cities may still be penalized under State housing laws for failing to meet housing production targets that are based on unrealistic population projections.

Because the growth forecast drives Regional Housing Needs Allocation (RHNA) requirements, CEQA baselines, transportation modeling, and infrastructure planning, reliance on an inflated forecast risks significant regional planning misalignment.

Response A23-5

Please refer to Response A3-6.

Comment A23-6

2. Wildfire, Emergency Evacuation, and Public Safety Impacts Are Significant and Unavoidable (SU)

The Draft EIR identifies several impacts as Significant and Unavoidable (SU):

- Impact HAZ-7 — Significant and Unavoidable (SU): Wildfire exposure, pollutant release, and post-fire geohazards in and near Fire Hazard Severity Zones (FHSZs).
- Impact HAZ-6 — Significant and Unavoidable (SU): Increased population and congestion impair emergency response and evacuation performance.
- Impact CUM-8 — Significant and Unavoidable (SU): Cumulative wildfire and evacuation impacts.

Although the Draft Plan excludes certain Wildland–Urban Interface (WUI) areas from Priority Development Areas (PDAs), the Draft EIR notes that development may still occur near high-risk locations, infrastructure will continue passing through fire-prone areas, and congestion will constrain evacuation capacity. Mitigation measures for HAZ-7, HAZ-8, and CUM-8 are discretionary, rely on voluntary implementation by local jurisdictions, and use "where feasible" language; therefore, wildfire and evacuation impacts remain Significant and Unavoidable (SU).

Response A23-6

Please refer to Response A3-7.

Comment A23-7

3. Water Supply, Wastewater, Stormwater, and Landfill Capacity Are Significant and Unavoidable (SU)

The Draft EIR finds the following impacts to be Significant and Unavoidable (SU):

- Impact PUF-1 — Significant and Unavoidable (SU) if not fully mitigated: Environmental impacts from new or expanded utility infrastructure.
- Impact PUF-2 — Significant and Unavoidable (SU): Insufficient water supplies in normal, dry, and multiple-dry-year scenarios.
- Impact PUF-3 — Significant and Unavoidable (SU): Wastewater treatment capacity shortfalls.
- Impact PUF-4 — Significant and Unavoidable (SU): Solid waste and landfill capacity limitations.

Regional landfill facilities are already operating near capacity, and many jurisdictions face long-term solid waste constraints that the Draft EIR does not fully address. Similarly, stormwater systems in numerous Bay Area communities are undersized or at or near capacity, particularly under projected climate-driven

increases in extreme precipitation. These constraints contribute to the Draft EIR's findings that solid waste and stormwater impacts remain Significant and Unavoidable (SU).

The Draft EIR is internally inconsistent: project-level and program-level watersupply impacts under Impact PUF-2 are Significant and Unavoidable (SU), yet cumulative hydrology and water-resource impacts in the Other CEQA-Mandated Sections are classified as "less than significant (LTS)." This is not credible, as cumulative impacts cannot be less severe than project-level Significant and Unavoidable (SU) impacts.

Many of the region's water, wastewater, and stormwater facilities lie in sea-level-rise zones, yet the Draft EIR relies on external agencies to undertake future adaptation projects without identifying funding, timelines, feasibility, or enforceable regional mitigation measures.

Accordingly, these infrastructure impacts remain Significant and Unavoidable (SU).

Response A23-7

Please refer to Responses A3-8 and A3-9.

Comment A23-8

4. Hospitals, Emergency Services, Police, Fire, and Schools — Mitigation Deferred; Impacts Remain Significant and Unavoidable (SU)

Under Impact PSR-1 — Significant and Unavoidable (SU) if mitigation is not fully implemented, the Draft EIR identifies increased demand for:

- Fire and police services,
- Emergency Medical Services (EMS),
- Hospital and Emergency Room (ER) capacity,
- K–12 school facilities, including special education,
- Libraries and civic facilities.

The Draft EIR provides a regional, qualitative assessment of public service impacts but states that it is not feasible to quantify system-specific impacts of hospital or ER capacity, fire/EMS response-time feasibility, police staffing constraints, or school district facility needs. Because mitigation consists of voluntary, future local actions, PSR-1 remains Significant and Unavoidable (SU).

Response A23-8

Please refer to Response A3-10.

Comment A23-9

5. Air Quality, Seismic, Flooding, and Hazardous Materials Impacts Are UnderAnalyzed; Many Are Significant and Unavoidable (SU)

The following impacts remain Significant and Unavoidable (SU) or are inadequately mitigated:

- Impact AQ-4 — Significant and Unavoidable (SU) if not fully mitigated: Freeway-adjacent pollutant exposure for sensitive receptors.
- Impact AQ-3 — Significant and Unavoidable (SU): Conflict with air-quality plans.

- Impact NOISE-1 / NOISE-2 — Significant and Unavoidable (SU): Construction and traffic noise.
- Impact GEO-1 through GEO-5 – Seismic and liquefaction hazards in unstable-soil or bayfill areas (classified as Less Than Significant with Mitigation, but still substantial).
- Impact HAZ-4 / HAZ-5 — Significant and Unavoidable (SU) in certain locations: Hazardous materials exposure and vapor intrusion risks.
- Impact BIO-1 through BIO-4 — Significant and Unavoidable (SU) for certain biological resource impacts: Including riparian disturbance and habitat fragmentation.

Many Priority Development Areas (PDAs) lie immediately adjacent to freeways—corridors with some of the highest PM2.5 and ultrafine particle concentrations in the state. The Draft EIR underestimates these risks by relying largely on existing regulations and generalized best practices rather than enforceable, performance-based mitigation, leaving freeway-adjacent air-quality impacts Significant and Unavoidable (SU) where local implementation is uncertain.

Many Plan Bay Area growth areas are projected to face tidal flooding, storm-surge impacts, overtopping of levees, or sea-level-rise hazards by 2050 and 2100. The Draft EIR repeatedly cites future coordination with external agencies to address these risks but does not identify funding, timelines, feasibility, or enforceable mechanisms for implementation. This constitutes mitigation deferral, which is not permissible unless performance standards and enforcement mechanisms are established.

Mitigation in this section depends heavily on existing regulations or discretionary local actions, without enforceable regional performance standards. As a result, these impacts remain Significant and Unavoidable (SU).

Response A23-9

Please refer to Responses A3-11 and A3-12.

Comment A23-10

6. Transportation, Vehicle Miles Traveled (VMT), Congestion, and Evacuation Impacts Are Significant and Unavoidable (SU)

The Draft EIR identifies the following transportation and evacuation-related impacts as Significant and Unavoidable (SU) or Less Than Significant (LTS):

- Impact TRA-2 — Significant and Unavoidable (SU): Conflicts with CEQA Vehicle Miles Traveled (VMT) standards.
- Impact TRA-4 — Significant and Unavoidable (LTS): Emergency access delays and evacuation constraints.
- Impact HAZ-6 — Significant and Unavoidable (SU): Increased population and congestion impair emergency response and evacuation performance.

Evacuation performance is not evaluated for earthquakes, Public Safety Power Shutoff (PSPS) events, flooding, or multi-hazard scenarios. The Draft Plan nonetheless places substantial growth in evacuation-constrained corridors.

Impact HAZ-6 highlights a critical fact: concentrating growth in certain corridors under the proposed plan can worsen traffic-related evacuation constraints, even if per-capita Vehicle Miles Traveled (VMT) is reduced region-wide.

Response A23-10

Please refer to Response A3-13.

Comment A23-11

7. Funding Risks and Unfunded Local Liabilities

The Draft Plan and Draft EIR assume that local governments, utilities, school districts, and special districts will fund and deliver many of the improvements needed to support Plan Bay Area 2050+ growth. However, many of these obligations lack identified funding, creating substantial uncertainty about the feasibility of required mitigation.

- Local Funding Required for Major Mitigations
  Several impacts identified as Significant and Unavoidable (SU)—including fire and police protection, Emergency Medical Services (EMS), hospital and ER capacity, K–12 and special-education facilities, water supply reliability, wastewater and stormwater capacity, flood protection, and evacuation performance—are expected to be addressed using local agency resources, with no fully secured regional, state, or federal funding.

- Reliance on Unsecured Funding
  The Draft EIR assumes that water, wastewater, stormwater, solid-waste, and school facilities will be funded through developer impact fees, capacity/connection fees, and customer utility rates. Recent State legislation, including SB 937 (fee deferral for certain projects) and AB 602 (fee constraints), makes these revenue sources increasingly uncertain and misaligned with the Plan's assumptions.

- Major Regional Initiatives Without Funding
  Large-scale Plan strategies—such as the EN1 sea-level-rise adaptation program (estimated at $96 billion, with only $6 billion identified), major transit expansions, and regional housing initiatives—depend on future regional tax measures and new State or federal funding that have not been secured.

Together, these gaps create significant unfunded liabilities for local jurisdictions. Many impacts remain Significant and Unavoidable (SU) not because mitigation is infeasible, but because no reliable funding mechanism has been established to carry it out.

Response A23-11

Please refer to Response A3-14.

Comment A23-12

City Council Requests

A. Corrections and Technical Revisions

   i. Align growth assumptions with California Department of Finance (DOF) and Demographic Research Unit (DRU) projections.

   ii. Add Reduced-Growth, Remote-Work, and AI-Impact alternatives.

   iii. Resolve inconsistencies between PUF and HYDRO findings.

   iv. Include enforceable, performance-based mitigation for wildfire, emergency evacuation, water supply, wastewater, hospitals, and schools.

v. Ensure that development in high wildfire-hazard areas proceeds only where enforceable mitigation measures – such as adequate evacuation capacity and fire-hardening standards – are in place.

vi. Ensure that development in high flood-risk or sea-level-rise-vulnerable areas proceeds only where long-term flood protection and clearly defined, feasible, and enforceable mitigation measures are assured.

Response A23-12

Please refer to Response A3-15.

Comment A23-13

B. Mitigation Improvements

i. Require development in wildfire-hazard areas to meet minimum evacuation capacity ratios, fire-hardening requirements, and defensible-space implementation before growth allocations are approved.

ii. Mitigation should address ER, ICU, and behavioral-health capacity triggered by population growth, rather than deferring to unfunded future local expansions.

iii. Conduct regional analyses of wastewater, stormwater, landfill, and electric-grid capacity.

iv. Adopt functional-recovery standards so critical facilities and corridors remain operable—or recover quickly—after earthquakes, wildfires, or extreme-weather events.

v. Identify funding gaps for major Plan strategies—such as the $96 billion EN1 sea level-rise program—and evaluate feasible phased or reduced-scale alternatives where funding is uncertain.

vi. Provide an assessment of the local capital and operating costs needed to support Plan Bay Area 2050+ growth, including the extent to which cities, counties, school districts, utilities, and special districts would need to rely on developer impact fees and local revenues.

vii. Reconcile the Plan's reliance on developer impact fees with recent State legislation that limits fee timing and justification.

Response A23-13

Please refer to Response A3-16.

Comment A23-14

C. Transparency

i. Clearly identify all impacts that are Significant and Unavoidable (SU).

ii. Provide a thorough Statement of Overriding Considerations if adopting the Plan despite its Significant and Unavoidable (SU) impacts.

Response A23-14

Please refer to Response A3-17.

Comment A23-15

In conclusion, the Draft Plan and Draft EIR do not yet demonstrate enforceable mitigation or provide sufficiently realistic, internally consistent analysis. To protect public safety, ensure infrastructure and

environmental resilience, and maintain fiscal responsibility, the City Council urges MTC and ABAG to revise both documents accordingly.

Response A23-15

Please refer to Response A3-18.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A24 Marin County

Derek Johnson, County Executive
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A24-1

Dear MTC and ABAG Boards,

On behalf of the Marin County Board of Supervisors, we appreciate the opportunity to comment on Draft Plan Bay Area 2050+ and its accompanying environmental analysis. We recognize that Plan Bay Area 2050+ is an update to Plan Bay Area 2050+ and that the region will begin work on the next comprehensive update – Plan Bay Area 2060 – in the coming years. We welcome early and continued collaboration with MTC and ABAG as that work moves forward.

With responsibility for local land use planning, housing element implementation, emergency preparedness, infrastructure delivery, environmental stewardship, and fiscal accountability, our Board is vested in ensuring that regional plans are both analytically sound and practically aligned with local conditions.

Response A24-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A24-2

Our comments focus on four core themes:

1. Importance of sustained collaboration on Equity Priority Community definitions;

2. Need for clearer prioritization and partnership around sea level rise and climate resilience;

3. Value of realistic, transparent growth assumptions as the region looks ahead to Plan Bay Area 2060 and its implications for RHNA; and

4. Opportunity for regional plans, funding, and policies to more directly support local housing element implementation, priority development areas, and transit investments.

Together, these issues reflect where closer coordination between MTC, ABAG, and local governments can most meaningfully strengthen future regional planning outcomes.

Response A24-2

Please refer to Responses A24-3 through A24-8 below.

Comment A24-3

1. Continued Coordination on Equity Priority Communities

We appreciate MTC's engagement last year regarding the Equity Priority Communities (EPC) framework. During the Draft 2024 EPC Update, the County of Marin raised significant concerns when Marin City was proposed for removal as an Equity Priority Community. We appreciate MTC's responsiveness to those concerns and emphasize the importance of maintaining EPC designations in a manner that recognizes historic disinvestment, structural inequities, and lived community experience – particularly in communities such as Marin City that have faced decades of underinvestment and exclusion.

Going forward, we strongly encourage MTC to continue partnering with local government and community stakeholders as EPC definitions evolve, including through the forthcoming EPC re-envisioning work. Ensuring that equity frameworks remain grounded in both quantitative data and qualitative, place-based context will be essential to achieving meaningful outcomes and maintaining trust with historically marginalized communities.

Response A24-3

Please refer to Response A21-3.

Comment A24-4

2. Sea Level Rise and Cross-Jurisdictional Climate Resilience

We support the inclusion of sea level rise mapping and climate risk considerations in Plan Bay Area 2050+. However, while the Plan identifies areas vulnerable to sea level rise, it provides limited prioritization or guidance for how jurisdictions should address these risks through coordinated, cross-jurisdictional strategies.

Given Marin's extensive shoreline, low-lying communities, and constrained transportation network, sea level rise presents direct and immediate implications for housing, evacuation routes, transit reliability, and regional connectivity. We encourage MTC to:

- Develop clearer regional prioritization frameworks for sea level rise adaptation investments;
- Support multi-jurisdictional planning and governance models for shoreline and transportation resilience; and
- Better align regional transportation funding with climate adaptation needs, particularly where infrastructure serves both local and regional functions.

Climate resilience considerations must also account for wildfire risk and emergency evacuation capacity. While we recognize that MTC is not a regional wildfire authority, climate change, wildfire risk, and development feasibility are inextricably linked. Marin's development opportunities are constrained by topography and climate vulnerability. Large portions of Marin are located in very high fire hazard severity zones with limited ingress and egress, placing heightened importance on transportation networks' evacuation capacity and resilience.

MTC's planning, funding, and investment decisions can play a meaningful role in addressing these challenges – including through support for evacuation routes, multimodal connectivity, system hardening, and complementary mitigation investments that reduce risk and improve safety. Integrating wildfire and evacuation considerations would support safer, more resilient development patterns over the coming decades.

Strengthening these aspects of the Draft Plan and its implementation would materially improve its usefulness to local governments facing near-term climate risks.

Response A24-4

Please refer to Response A21-4.

Comment A24-5

3. Growth Forecasts and Policy-Based Assumptions

Our Board continues to have serious concerns regarding the population and employment growth assumptions reflected in Draft Plan Bay Area 2050+. Based on actual residency and demographic trends and recent employment patterns – we do not believe the projected levels of resident and job growth are realistic for Marin County.

Draft Plan Bay Area 2050+ relies on a policy-driven forecasting approach that differs materially from the demographic and economic models used by other state agencies. The Draft Plan's population projections diverge significantly from those issued by the California Department of Finance (DOF), the State's official source for population projections, which rely on a cohort-component methodology grounded in observed trends in births, deaths, aging, and net migration. For Marin County, the Draft Plan assumes population growth of approximately 22,200 additional residents by 2050, while DOF instead projects a population **decline** of 6,437 over the same period.

Similarly, the Plan's employment projections do not reflect recent and ongoing structural shifts in Marin's economy. Over the past decade, Marin has experienced the departure or consolidation of several major employers, including Autodesk, Glassdoor, and Fireman's Fund, reflecting broader regional trends toward consolidation, remote and hybrid work, and reduced demand for traditional office-based employment.

We recognize that the Draft Plan's growth assumptions were approved earlier in 2025 as part of the adopted Plan Blueprint, and that revisiting those assumptions at this stage would require extensive re-modeling that is not feasible within the current planning cycle.

However, it is important to clearly acknowledge the implications of relying on growth assumptions that are not aligned with observed demographic and employment trends. While Plan Bay Area 2050+ itself does not directly determine Regional Housing Needs Allocation (RHNA) numbers, future forecasts developed for Plan Bay Area 2060 **will inform** the next RHNA cycle and will carry significant regulatory and legal consequences for local governments.

Accordingly, we strongly requests early and close collaboration with MTC as Plan Bay Area 2060 assumptions are developed, including transparent evaluation of alternative growth scenarios such as lower-growth, remote-work, and technology-driven productivity scenarios; clearer articulation of how policy-based forecasts should be interpreted by local jurisdictions; and greater alignment, where feasible, with other state demographic frameworks so that local governments are not required to plan against inconsistent datasets.

Response A24-5

Please refer to Response A21-5.

Comment A24-6

4. Priority Development Areas, Transit-Oriented Communities, and Housing Element Implementation

As MTC revisits the Priority Development Area (PDA) framework in coming years, our Board asks that frameworks reflect recent state housing legislation, evolving Transit-Oriented Communities (TOC) policies, and the realities of local implementation.

In Marin, we recognize that PDAs and TOCs will continue to play a central role in accommodating housing growth. While Marin City has recently paused aspects of its PDA process, the County remains committed to long-term planning and anticipates significant development activity countywide in the years ahead.

We urge MTC to ensure that regional plans, incentives, and transportation investments are explicitly designed to **support local Housing Element implementation** – including:

- Aligning regional transportation funding with identified Housing Element opportunity sites;
- Supporting infrastructure investments necessary to unlock housing development in constrained or under-resourced areas; and
- Ensuring PDA and TOC policies reflect wildfire risk, evacuation capacity, and climate constraints alongside housing and transit objectives.

Additionally, many communities in Marin that are identified for housing growth in certified Housing Elements do not qualify as Transit-Oriented Communities (TOCs) or fall within other regional program categories that direct MTC transportation and infrastructure funding. Despite this, these communities still need meaningful investments in transportation, utilities, and public services to support new housing. We encourage MTC to consider how regional funding frameworks can more flexibly support housing-supportive infrastructure in communities that may not neatly align with existing programmatic definitions, but are nonetheless essential to meeting regional housing goals.

Response A24-6

Please refer to Response A21-6 and "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+."

Comment A24-7

5. Regional Partnership Opportunities and Priority Investments

Finally, we encourage MTC to continue strengthening its role as a regional partner in supporting local economic vitality, equitable access, and climate-aligned transportation investments. In Marin, this includes opportunities to advance priority projects and initiatives such as:

- Improved Highway 580 transit connections;
- Expanded green transit incentives and zero-emission mobility options; and
- Investments that better connect North Bay communities to the regional core while recognizing distinct geographic and economic conditions.
- Alignment with regional economic development plans, such as Comprehensive Economic Development Strategies (CEDS)

We believe there is significant opportunity for MTC's regional planning and funding programs to more directly support local implementation outcomes while advancing shared regional goals.

Response A24-7

Please refer to Response A21-7 "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+."

Comment A24-8

Conclusion

We support the overarching climate, equity, housing, and mobility goals of these regional planning frameworks, and we remain committed to doing our part to address the region's housing and transportation challenges. Over the past decade, our Board has committed over $49 million in General Fund resources toward affordable housing and has supported the creation or preservation of more than 1,400 affordable housing units through new construction, acquisition, conversion, and preservation. The County's Housing Element -- certified by the State in June 2023 following extensive research, outreach, and public engagement -- plans for the addition of over 3,500 new affordable housing units in unincorporated Marin.

Recognizing the scale of the housing challenge, the Board has doubled its ongoing investment in the Affordable Housing Trust Fund, committing an additional $5 million annually beginning last year. Given that the cost of producing a single affordable unit in Marin often approaches $1 million per unit, sustained local investment and strategic partnerships are essential.

Our comments are intended to clarify local conditions, identify opportunities for improved coordination, and underscore the importance of grounding future regional plans in realistic assumptions that local governments can responsibly implement.

We appreciate the opportunity to comment and look forward to continued partnership with MTC and ABAG as the region moves toward Plan Bay Area 2060.

Response A24-8

Please refer to Response A21-8.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A25 San Mateo County

Bharat Singh, Planning Services Manager
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A25-1

The San Mateo County Planning and Building Department appreciates the opportunity to review and provide comment on the Draft Plan Bay Area 2050+.

The Department's comments are in regard to the projections of growth in unincorporated areas of San Mateo County within the Spheres of Influence of various incorporated cities. Plan Bay Area's Draft Modeling and Forecasting Report depicts the Urban Boundary lines for all nine counties in the Bay Area. Areas outside the Urban Growth boundaries are assumed to experience further development only in the

No Project alternative; the Plan incorporates Strategy EN 4: Maintain Urban Growth Boundary, and states that "The No Project Alternative has weak enforcement of the [urban growth] boundary, allowing suburban growth to spill past it." As expressed in Plan Bay Area 2050+, additional development in any of these areas is an undesirable outcome, absent strong policies to prevent such development.

However, in San Mateo County, the areas depicted as outside the Urban Growth Boundary include a number of unincorporated "islands" that are within the Sphere of Influence of an adjacent city, are wholly surrounded by developed, incorporated areas, and are themselves developed to urban densities. Urban level development of these areas has occurred and is projected to continue, and in fact significant additional residential development in these areas is a key strategy for addressing the County's housing needs and meeting the unincorporated County's Regional Housing Needs Allocation.

These areas include:

- Broadmoor and Unincorporated Colma, in the Daly City sphere of influence
- The Harbor Industrial Area, within the Belmont sphere of influence
- The Sequoia Tract, Emerald Lake Hills, and North Fair Oaks, within the Redwood City sphere

Unincorporated Colma and North Fair Oaks are both designated Priority Development Areas. Unincorporated Colma and portions of the Harbor Industrial Area and Broadmoor are also being rezoned for substantially higher residential densities pursuant to the County's Housing Element Rezoning Program.

While the no project alternative might well result in development of previously undeveloped areas outside Urban Boundary lines in other counties, the assumption that growth will not otherwise occur in San Mateo County's urbanized unincorporated areas, and that such growth would be undesirable, is an inaccurate depiction of projected and desired growth in these areas. Growth modeling in both project and no-project scenarios should account for the fact that these areas are planned for, and zoned for future higher density development, particularly residential development, regardless of the outcomes of Plan Bay Area 2050+. Ideally, the Plan would make a distinction between areas outside Urban Boundaries that would in fact experience greenfield development and/or significant suburbanization absent policies adopted in the Plan, and unincorporated areas within already urbanized areas, where growth remains desirable.

Response A25-1

The comment does not raise environmental issues regarding the adequacy, accuracy, or completeness of the Draft EIR.

The commenter's concern regarding the treatment of certain unincorporated areas in San Mateo County resulted from a mapping error in Figure 18, "Urban Boundary Lines Across Alternatives," in the Draft Forecasting and Modeling Report. The figure incorrectly depicted certain areas as outside the applicable Urban Boundary lines under the proposed plan, while correctly reflecting their treatment under the No Project Alternative. This mapping error has been corrected in the proposed Final Forecasting and Modeling Report.

The land use modeling underlying both the proposed plan and the No Project Alternative appropriately allows for development. Growth in these areas was not restricted by Strategy EN4. The correction to Figure 18 clarifies the consistency between the modeling assumptions and the plan documentation and does not result in changes to the environmental analysis presented in the Draft EIR. Please refer to Response A9-2 related to the comment letter submitted by the San Mateo LAFCo.

Comment A25-2

Secondly, The County would like to point out that in the No Alternative scenario, the Urban Midcoast of San Mateo (El Granda, Montara, Moss Beach) are also shown as locations for sub-urban growth spill. However, the County's Local Coastal Program (LCP) limits the permitting of new residential development to 40 units per year (LCP policy 1.23), until the County adopts a transportation management plan for the area. Any growth estimates for the area in all the assessed alternatives should account for this limitation.

Response A25-2

Please refer to "Master Response 3: Plan Alternatives" regarding the No Project Alternative analyzed in the EIR. Please refer to "Master Response 4: Program Level Document" regarding the level of analysis conducted in the EIR for the plan. As discussed therein, the EIR does not include details for each County, such as consistency with specific policies.

Letter A26 City of Brentwood

Harold Duffey, City Manager
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A26-1

Dear MTC and ABAG Board Members:

Thank you for the opportunity to comment on Draft Plan Bay Area 2050+ ("the Plan") and the Draft Programmatic Environmental Impact Report (EIR) prepared for the project. The City of Brentwood ("the City") understands that the Plan is a limited and focused update of Plan Bay Area 2050, MTC and ABAG's 30-year vision for the Bay Area that was adopted in 2021. The City supports the Plan's focus on improving transportation, equity, housing, the economy and the environment, but has concerns about the plans fiscal impacts and impacts on local land use authority, as detailed below.

By reference, we also express our support for the comments submitted by the City of Lafayette in its letter dated December 15, 2025.

Response A26-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to Response A6-1 through A6-7 related to the comment letter submitted by the City of Lafayette.

Comment A26-2

<u>Local Land Use Control</u>

The City of Brentwood agrees with many of the draft strategies included in the plan. In fact, many of the City's programs already align with the draft strategies. For example:

- *H3 - Allow a Greater Mix of Housing Densities and Types in Growth Geographies. Allow a mix of housing types at a range of densities and in a variety of building configurations to be built in Priority Development Areas, select High-Resource Areas, and select Transit-Rich Areas, including areas where the Transit-Oriented Communities Policy applies, augmented by streamlined review and reduced parking requirements for affordable homes, as well as building code updates*. The City adopted a Specific Plan for its Priority Area 1 Priority Development Area that allows for a wide variety of housing densities and incorporates a possible future transit station.

- *H5 - Integrate Affordable Housing into All Major Housing Projects. Require a baseline of 10%to 20% of new market-rate housing developments of five units or more to be affordable to low-income households*. The Brentwood City Council initiated an amendment to the City's Affordable Housing Ordinance to require projects to include 18% of the units to be affordable to low-income households. The Council adopted the Ordinance on December 13, 2025.

- *EN5: Protect and Manage High-Value Conservation Lands. Protect and preserve high-priority natural and working lands, improving the resilience and connectivity of the region's biodiversity and the sustainability and vibrancy of the agricultural sector*. The City's General Plan contains multiple policies to protect the City's agricultural heritage and the agricultural sector. The City is also an active participant in the East Contra Costa Habitat Conservation Plan/Natural Community Conservation Plan in order to preserve valuable natural resources in our community.

- *EN8 - Expand Clean Vehicle Initiatives. Expand investments in clean vehicles, including electric vehicles and electric mobility options, and charging infrastructure subsidies, to accelerate the transition from conventional vehicles*. The City is investing in electrifying its fleet by implementing a $3.15M project that will install charging equipment to allow the City's fleet to begin conversion to electric vehicles as required by the 2020 Executive Order N-79-20.The project will install 18 charging stations, and is expected to save the City in excess of $5Mover the life of the project.

As the above demonstrates, the City of Brentwood's policies and programs overlap in many ways with the draft policies contained in the Plan. However, the City continues to be a strong proponent of local control and has concerns with the Plan's potential impacts on local land use control. The Plan includes potentially conflicting statements regarding the Plan's relationship to local land use decisions. For example, the document states "The plan does not override local land use decisions like zoning or development, and the strategies are intended to guide future planning efforts, not to impose mandates or propose legislation." Yet, the document also states "Long-range plans, such as this document, serve to articulate these shared, regional goals and, ultimately, influence strategic policy decisions and action."

The City agrees that ABAG/MTC does not have the authority to override local land use decisions. However, the City acknowledges that ABAG/MTC does have the ability to influence legislation and regional policy that could ultimately become de facto requirements or legal standards local jurisdictions must comply with. Because many of the ambitious and costly strategies in the Plan are not feasible for local jurisdictions to implement, this could cause extremely negative impacts on the City. Therefore, the City requests that, rather than using proscriptive language, each strategy be revised to make it clearer that the strategies are not mandates, but are instead possible actions that can be taken to address the Plan's priorities.

Response A26-2

Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding local land use control as related to the plan implementation. As discussed therein neither the proposed plan nor the Draft EIR limit in any way the land use authority of any city or county (Government Code Section 65080(b)(2)(K)). Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding strategy revisions.

Comment A26-3

Local Fiscal Impacts

The Plan acknowledges that "Although the plan forecasts an increase in housing revenue compared to the previous plan, needs dwarf existing revenues by $339 billion. Potential revenues to support the Housing Element could include any mix of federal, state, regional and local sources." Despite this, the Draft

Implementation Actions rely heavily on only two strategies to fund the Housing Strategies – a regional housing revenue measure subject to voter approval in 2028 and seeking grant, philanthropic and state funding. The passage of a ballot measure in 2028 is far from certain and the City is skeptical that State funding and grants would be able to fund the Plan's ambitious goals.

The Plan is replacing the original transit strategies with new, service-oriented regional transit vision. Specific to Brentwood, the Plan has a project list that is the same as what was in the Plan Bay Area 2050 plan for Brentwood:

- Antioch-Brentwood Bus Rapid Transit (SR-4 Corridor) – operate a new bus service between Antioch and Brentwood along SR-4. The route alignment would connect Antioch BART Station with the Brentwood Park & Ride lot.
- Widening of Brentwood Blvd north of Havenwood through Oakley.
- Overall improved local bus service (frequency).

The City supports the inclusion of these projects in the Plan, but, similar to the Housing Strategies, the Draft Implementation Actions for Transportation rely on the passage of a regional revenue measure on the 2026 ballot.

The City suggests that the Plan consider and include alternate funding sources that do not have the potential to shift the funding burden to local jurisdictions, which least can afford it. If these can't be identified, then the Strategies and Implementation Plan should be revised to ensure the Plan is fiscally feasible and does not overly rely on funding from local jurisdictions. The City also suggests that the Plan add more Implementation Strategies that advocate for State and regional funding to implement the Plan (e.g. 57. Advocate for continued state Regional Early Action Planning (REAP).)

Response A26-2

Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding funding uncertainty for the plan. The proposed plan recognizes that some strategies identified in the plan may not be implemented, may be implemented at a reduced scale, or may be implemented on a longer timeframe if anticipated funding sources are not realized. Accordingly, the plan's discussion of investment needs and funding pathways is best understood as describing a range of implementation concepts rather than a guaranteed delivery schedule. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding additional strategies for the proposed plan.

Letter A27 City of Milpitas

Lillian Vanhua, Principal Planner
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A27-1

Dear MTC and ABAG Board Members,

The City of Milpitas appreciates the opportunity to comment on the Draft Plan Bay Area 2050+ and its accompanying Draft Environmental Impact Report (Draft EIR). The City recognizes that the Draft Plan Bay Area 2050+ is a revision to the original Plan Bay Area 2050 largely due to external forces like the COVID-19 Pandemic and regional growth forecast. Milpitas is supportive of the proposed Plan's goal to make the Bay

Area more affordable, connected, diverse, healthy, and vibrant for all residents, while also achieving regional greenhouse gas emissions reduction targets established by the California Air Resources Board. Specifically, we have the following comments:

Response A27-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment A27-2

1. Although the regional growth forecast decreases the total population for the Bay Area by 750,000 in 2050, the City would like to reiterate that any increases to growth in the Priority Development Areas or Priority Production Areas would further strain the City's infrastructure and result in environmental impacts that the City is not prepared to mitigate or manage. The Final EIR should more fully evaluate cumulative impacts to local infrastructure systems and clearly identify funding mechanisms to ensure that growth induced by the Plan does not disproportionately burden local jurisdictions.

Response A27-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth. The environmental impacts related to implementation of the proposed plan are analyzed throughout the Draft EIR and are mitigated to the extent feasible. Cumulative impacts from the proposed plan are analyzed on pages 5-9 through 5-21 in Chapter 5, "Other CEQA" of the Draft EIR. As discussed in Chater 5 the proposed plan is a cumulative plan by design and the environmental analysis of the proposed plan presented throughout the Draft EIR is a cumulative analysis compliant with the requirements of CEQA and the CEQA Guidelines. However, the Draft EIR includes impacts associated with implementation of the proposed plan, plus implementation of projected development for jurisdictions adjoining the Bay Area, to assess the potential for cumulative impacts from growth extending beyond the region. Growth inducing impacts from the proposed plan are analyzed on pages 5-6 to 5-9 in Chapter 5, "Other CEQA" of the Draft EIR. Chapter 5 includes an analysis of growth including impacts related to fostering population growth, fostering economic growth, affecting services levels, facility capacity, and infrastructure demand, and eliminating obstacles to population growth. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding funding for the plan.

Letter A28 City of Walnut Creek

Kevin Wilk, Mayor
December 19, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A28-1

Dear MTC and ABAG Board Members:

The City of Walnut Creek appreciates the opportunity to comment on the Draft Plan Bay Area 2050+ and the Draft Environmental Impact Report. The proposed Plan Bay Area 2050+ appears intended to embed the Transit-Oriented Communities (TOC) policy as a foundational element of the region's planning and funding framework. As such, our concerns mirror those identified in our October 22, 2025 letter regarding the TOC policy (attached).

Response A28-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to Response A24-3 and "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+" regarding the Transit-Oriented Communities policy.

Comment A28-2

1. Inconsistency Between Forecasted Regional Growth Patterns, Policy, and Implementation

Walnut Creek is divided between two "superdistricts" that are projected to accommodate 1–2% of regional household growth and 0% of regional job growth through the 2050 planning horizon. While community stakeholders have questioned whether the forecasted population growth is overstated relative to State Department of Finance projections, our primary concern is being held accountable for implementing a TOC policy that is not supported by the growth projections contained in the Draft Plan Bay Area 2050+.

Specifically:

- **Housing Growth:** Walnut Creek has sufficient capacity to accommodate the future population growth identified in Plan Bay Area 2050+. Our State certified 2023–2031 Housing Element provides adequate capacity for anticipated growth during that period. In addition, subsequent changes in state housing law—such as increased density bonus allowances, expanded allowances for accessory dwelling units (ADUs), and provisions permitting housing on faith-based and certain commercially zoned properties—further enhance our community's capacity. Compliance with the proposed TOC policy as a condition of receiving regional funding, including One Bay Area Grant (OBAG) 4 funding, would require increasing housing capacity beyond what is necessary to meet projected growth.
- **Employment Growth:** Plan Bay Area 2050+ forecasts 0% employment growth for Walnut Creek. However, eligibility for regional funding would nonetheless require adoption of a TOC policy mandating minimum commercial land use densities that exceed those established in our General Plan.

These examples illustrate a fundamental disconnect between the growth assumptions in Plan Bay Area 2050+ and the broadly conceived TOC policy, which does not align with the plan's own data and forecasts.

Response A28-2

As described in "Master Response 1: Regional Growth Forecast" and "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+," the proposed plan's regional growth forecasts and development pattern are used for long-range planning and programmatic environmental analysis. Implementation of TOC-related requirements through discretionary regional funding programs (including OBAG) would occur through separate Commission actions establishing adopted program guidelines and eligibility criteria. Adoption of the proposed plan does not affect the independent land use authority of local jurisdictions.

Comment A28-3

2. Flexibility in Accommodating Future Growth

Plan Bay Area 2050+ states that it is "a long-range vision and not a financial programming document." It further asserts that the plan does not allocate funding to specific projects, does not override local land use decisions, and is intended to guide future planning rather than impose mandates or propose legislation.

Despite these assertions, numerous policies and strategies within Plan Bay Area 2050+ are structured in ways that effectively compel implementation of a TOC policy requiring changes to land use densities, housing policies, and local investment priorities. When access to regional resources needed to address regional needs within a jurisdiction's boundaries is conditioned on compliance with the TOC policy, this approach functions as a mandate rather than a choice and undermines local authority and decision-making.

Response A28-3

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" and "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+," Plan Bay Area 2050+ does not override local land use authority, and land use decisions remain under the authority of local jurisdictions. Implementation of TOC-related requirements through discretionary regional transportation funding programs would occur through separate Commission actions establishing adopted program guidelines and eligibility criteria. Adoption of the proposed plan does not itself impose land use mandates.

Comment A28-4

Thank you for considering our comments. Walnut Creek remains committed to working collaboratively with regional partners to realize a shared vision of a Bay Area that is affordable, connected, diverse, healthy, and economically vibrant.

Response A28-4

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter A29 San Francisco Water Power Sewer

Jennifer Lee, Utility Specialist
December 10, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment A29-1

To whom this may concern, I would like to point out a couple of errors in the Draft EIR. Shown on page 122 of 874 is the forecasted household and employment growth by county (screenshot attached). In Table 2-1, (1) the employment figures are not adding up to the total row and (2) the rows appear to be offset by one, ex: the County of San Francisco's 2050 employment projection should be 959,500, not 592,800.

Table 2-1: Forecasted Household and Employment Growth, 2020-2050, by County

County	Households			Employment		
	Base Year, 2020	Proposed Plan, 2050	Change, 2020 to 2050	Base Year, 2020	Proposed Plan, 2050	Change, 2020 to 2050
Alameda	588,800	840,500	251,700	410,800	526,100	115,300
Contra Costa	396,500	492,000	95,500	127,300	126,300	-970
Marin	108,700	130,900	22,200	67,600	72,400	4,800
Napa	50,500	56,200	5,700	710,700	959,500	248,800
San Francisco	385,600	578,600	193,000	397,400	592,800	195,400
San Mateo	286,700	394,300	107,600	1,079,700	1,620,200	540,500
Santa Clara	646,100	934,600	288,500	128,400	159,600	31,200
Solano	142,600	152,900	10,300	215,900	268,200	52,300
Sonoma	186,100	214,000	27,900	410,800	526,100	115,300
Regional Total	2,792,000	3,794,000	1,002,000	4,023,000	5,434,000	1,410,000

Notes: Numbers less than 1 are shown as "<1"; whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100, greater than 1,000,000 to the nearest 1,000). Figures may not sum because of independent rounding.

Source: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

Response A29-1

This issue was raised in other comments on the Draft EIR. Please refer to Response A11-6, which addresses this table formatting error. The table will be corrected in the Final EIR to ensure that county projections are properly aligned and totals are accurate.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Organizations

Letter O1 Catalysts for Local Control

Susan Kirsch, Founder and Director
November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O1-1

Dear MTC Planning & ABAG Admin Commissioners,

Thank you for holding public hearings on PBA2050+/DEIR. Please add my comments from the Marin Voice column, published by the Marin Independent Journal, to the public record.

Besides the link, the column is cut & pasted below.

Response O1-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O1-2

Marin Voice: Plan Bay Area's draft report is built on false narrative

By Susan Kirsch

PUBLISHED: November 9, 2025 at 12:57 PM PST

San Francisco Bay Area residents are once again being given a chance to see what regional planners propose for us through 2050 and the predicted impacts on our lives. Two regional agencies sit at the center of this effort. The Metropolitan Transportation Commission has about 422 employees and a budget of roughly $360 million. The Association of Bay Area Governments operates with a budget of about $93 million and no separate staff; instead, MTC staff support ABAG's programs. Under this governance model, MTC staff shape how our region grows and oversee regional investments.

Their joint blueprint, Plan Bay Area 2050+, identifies needs and revenues for implementing 35 strategies covering transportation, housing, the economy and the environment. The draft environmental impact report, a legally required analysis under the California Environmental Quality Act, examines what that growth will mean for aesthetics, air quality, wildfire risk, and 14 other environmental categories.

The draft report is intended to help the MTC/ABAG governing boards, with input from the public, weigh the plan's benefits against its hazards.

First, the glossy news: Plan Bay Area 2050+ lays out a plan to collect and invest about $512 billion for transportation, $746 billion to accommodate projected population and housing growth and $229 billion to protect the region from sea-level rise.

These plans raise a key question: Where's the money going to come from? Just last year, the Bay Area Housing Finance Authority and MTC were forced to pull Regional Measure 4, a proposed $20 billion regional housing bond, after financial errors surfaced. Reports described it as a "$20 billion mistake" for

a bond that overpromised and collapsed under scrutiny. If that single measure couldn't withstand public or financial review, how can the public be confident that a trillion-dollar plan will fare any better?

Response O1-2

As described in "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," Plan Bay Area 2050+ is a long-range regional policy framework and is not a financial programming document. Adoption of the proposed plan does not commit MTC, ABAG, or local jurisdictions to specific expenditures and does not guarantee that prospective funding sources—including those requiring future legislative action, voter approval, or appropriations—will be secured. Implementation of plan strategies would occur over time through future decisions and actions by multiple agencies, including separate funding and programming decisions.

Comment O1-3

When we move from the plan itself to the environmental report, the good news sours. It acknowledges dozens of "significant and unavoidable impacts," harms that remain even if every mitigation measure were implemented.

Among the unavoidable impacts are aesthetic degradation, increased wildfire danger, water-supply vulnerability, and transportation congestion. The report lists aesthetic impacts that include loss of scenic vistas and damage to scenic highways. It concedes that the plan will exacerbate the risk of wildland fires. Water reliability remains precarious, with most of the region dependent on imported sources and aging groundwater basins. And while transportation models promise shorter commutes, the draft impact report notes that congestion and air-quality impacts will persist.

Because these harms remain, the MTC and ABAG boards cannot approve the plan without first adopting a "statement of overriding considerations." Under CEQA guidelines, the statement allows agencies to declare that the benefits of a project outweigh its unmitigated harms. In this case, MTC staff will likely urge the boards to cite the Bay Area's "housing crisis" as the overriding consideration justifying approval.

Response O1-3

This comment provides a summary of findings and information about the Draft EIR. Please refer to "Mater Response 2: Mitigation Measures" regarding significant and unavoidable impacts in the EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. These statements are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O1-4

Here's the heart of the problem: The population and job forecasts baked into Plan Bay Area 2050+ appears to be unreliable. The California Department of Finance, starting with data from 2020, projects only modest population growth statewide through 2050 — about 5% — while the plan assumes roughly 24% growth in the Bay Area. It also assumes housing costs will decline dramatically, with home-price trends returning to early-2000s levels by 2050, an assumption few economists consider realistic.

By inflating growth projections, I think the plan creates an artificial sense of crisis —ignoring the real issue of affordability. That "crisis" is then used as the political reason to override environmental harms. It's the same logic behind unfunded housing mandates and the unreliable regional housing quotas that MTC and ABAG will revisit when they update the "sustainable communities" strategy.

If built on shaky assumptions, the whole structure tilts toward collapse. Yes, the Bay Area needs long-term planning and investments, but until the assumptions and the numbers are reliable, the draft environmental impact report and the 2050 plan should be sent back.

Response O1-4

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment O1-5

Here's what you can do: Before Dec. 18, email comments to eircomments@bayareametro.gov; contact your MTC representative and say that, until the numbers and assumptions are reliable, all should vote no on any statement of overriding considerations and on certification of the draft report; attend a public meeting (details at planbayarea.org/draftplan); and join the next Catalysts online video conference on Monday at 5 p.m..

Mill Valley's Susan Kirsch is founder of Catalysts for Local Control. Learn more at catalystsca.org.

Response O1-5

This comment provides information about how to comment on the Draft EIR. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. This statement is acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O2 SHIFT Bay Area

Gregg Dieguez, Director of Sustainability
November 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O2-1

Dear PBA,

This document:
https://planbayarea.org/sites/default/files/documents/Notice_of_Preparation_Plan_Bay_Area_2050%2B_Draft_Environmental_Impact_Report.pdf

Contains numbers in a table on page A-4 of which I cannot find supporting details. Footnotes 1 and 2, for example, do not refer to the sources.

Please provide the assumptions upon which these numbers are based and/or refer me to an existing document that does so.

Response O2-1

The commenter is referring to the Notice of Preparation for the program-level Draft EIR that was released on January 14, 2025. The table in Attachment A (page A-4) of the Notice of Preparation includes high-level, rounded estimates of existing revenues and estimated new revenues anticipated to support Plan Bay Area 2050+ strategies by element. As noted in the Notice of Preparation, existing economic development revenues were not inventoried, and a portion of existing transportation revenues is assumed to support environment strategies. The Notice of Preparation also notes that new revenue totals are estimates based on Final Blueprint strategies and are subject to change.

The Notice of Preparation table is intended as a summary-level overview for CEQA scoping purposes. Supporting assumptions for revenue estimates and strategy-level funding needs are documented in the Draft plan and in technical materials prepared to support the Draft EIR. Additional detail regarding the methodology, assumptions, and sources used to estimate these revenue totals are provided in Plan Bay Area 2050+ Technical Assumptions Report.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter O3 Long Heritage

Shelly Long, Board of Directors
November 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O3-1

MTC and ABAG Planners,

Thank you for the opportunity to review the Plan Bay Area 2050 Plus Draft Environmental Impact Report (DEIR). Long Heritage is a 501(c)(3) nonprofit organization dedicated to long term social, ecological, and economic resilience through heritage-based planning, public comment review, and community education. Our mission is to help communities make informed decisions today so that future generations inherit stability, cultural continuity, and environmental health.

We appreciate the depth and ambition of this regional plan. The DEIR shows a strong commitment to long range planning, climate resilience, multimodal transportation; and the coordination of housing, economic, and environmental strategies across the nine-county region. Its focus on intergenerational wellbeing and community resilience aligns closely with the mission and values of Long Heritage. The effort and scale of the work presented are commendable.

For your consideration, we offer the following comments and recommendations.

Response O3-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O3-2

Cultural Resources

Tribal Consultation and Incorporation of Tribal Input

We appreciate that the DEIR acknowledges the importance of Tribal Cultural Resources and incorporates them into the cultural resources analysis. this reflects appropriate respect for Tribal sovereignty and aligns with California Environmental Quality Act requirements. However, the document presents two different Tribal engagement processes that both require clarity and improvement.

The first process is Assembly Bill 52 consultation. While the DEIR notes that Assembly Bill 52 consultation was initiated, it does not describe how this consultation proceeded, what concerns were raised, or how this input shaped the analysis and mitigation measures. Without this information, the role and outcomes of Assembly Bill 52 consultation remain unclear.

The DEIR also states that in addition to AB-52 consultation, thirty-three Tribes identified through the Native American Heritage Commission were notified. Only one Tribe responded, and the DEIR does not indicate whether follow up contact or additional efforts were made. Tribal governments in the Bay Area receive large numbers of consultation requests and often have limited staff capacity. A single letter per Tribe is not sufficient for a regionwide plan with long term implications.

The region is home to an estimated eighteen thousand five hundred Indigenous residents. Given the scale and duration of this plan, meaningful Tribal participation is essential. Greater transparency and more thorough outreach efforts would strengthen this section.

We recommend the following improvements.

- Provide a clear summary of Assembly Bill 52 consultation outcomes that identifies general themes, cultural priorities, and concerns while maintaining confidentiality.
- Conduct additional outreach to the Tribes identified through the Native American Heritage Commission list, including follow up phone calls, in person visits when appropriate, and multiple opportunities for virtual or in person meetings.
- Host a public town hall focused on Indigenous residents and Tribal communities, advertised through community networks and Indigenous led platforms.
- Clarify how Tribal perspectives will be incorporated into program level decisions and future project level reviews
- Commit to ongoing communication with Tribal governments throughout the twenty-five-year implementation period.

Response O3-2

Table 3.7-2, beginning on page 3.7-12 of the Draft EIR, is a summary of the AB 52 consultation effort including the request to the NAHC for a list of tribes and initial letters sent on August 4, 2023 to those tribes. Only one tribe requested consultation, and Tribal representatives did not respond to MTC's request to schedule initial consultation meeting over a period of nearly 4 months with the last communication from MTC on January 2, 2204. No meetings with tribes occurred. Because no information was provided by any of the tribes no summary of outcomes can be provided.

For additional outreach to tribes, as described on page 3.7-16 of the Draft EIR, MTC sent the Notice of Preparation letters to the tribes on January 22, 2025. A follow up email was sent to the tribes on February 14, 2025 and the tribes were offered additional time to provide comments in response to the Notice of Preparation until March 17, 2025. Tribes had over 1 year and 7 months to provide input.

Please refer to "Master Response 4: Program Level Document" for an explanation of the program level analysis prepared for the plan. Future individual development projects implemented under the plan completing CEQA would be required to undergo tribal consultation at the time a project is proposed consistent with the requirements of AB 52. There will be no subsequent program level decisions as part of the plan for tribes to be engaged in. Tribes were engaged as required under AB 52, as well as through the Notice of Preparation process. Additionally, tribes had the opportunity to comment on the Draft EIR similar to any other stakeholder.

MTC's adopted Public Participation Plan (PPP) establishes an ongoing commitment to meaningful communication, engagement, and consultation with Tribal governments throughout the development and implementation of its plans and programs. Consistent with the PPP, MTC is committed to consult with

federally recognized Tribal governments on Plan Bay Area, the Transportation Improvement Program, and matters of priority to Tribes. Tribes are encouraged to request government-to-government consultation at any time. MTC will engage Tribal governments early in decision-making processes and in accordance with Tribal preferences. Engagement opportunities will include continued Tribal Summits as well as individual meetings upon request. These commitments apply throughout the implementation of Plan Bay Area.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Comment O3-3
Cumulative Impacts on Cultural and Tribal Cultural Resources

The DEIR acknowledges the potential for long term development, transportation improvements, and climate adaptation projects to affect cultural and Tribal Cultural Resources. However, the cumulative impact analysis is limited and does not fully address how repeated small-scale activities across nine counties may collectively affect archaeological sites, cultural landscapes, and traditional cultural places.

We recommend expanding the cumulative impact analysis to include the following.

- A regionwide explanation of how repeated ground disturbance and transportation improvements may cumulatively affect archaeological and Tribal Cultural Resources.
- An expanded discussion of traditional cultural landscapes rather than focusing solely on individual resource locations.
- Consideration of cumulative effects on cultural practices and intangible heritage tied to specific landscapes such as coastlines, river corridors, and upland areas.
- A commitment to periodic regional reporting or cultural resource monitoring throughout the implementation period.

Response O3-3
On page 5-15 of the Draft EIR the analysis of cumulative impacts explains how most cultural resources do not have a regional significance. For instance, impacts on a subsurface archaeological find at one project site are generally not made worse by impacts from another project on a cultural resource at another site. Therefore, the plan's contribution to a significant cumulative impact on archeological resources was determined not to be cumulatively considerable. However, due to the extent of ancestral territories for affected tribes it was determined that the 'incremental contribution to cumulative tribal cultural resources impacts would be cumulatively considerable and would be significant."

An expanded discussion of traditional cultural landscapes was not provided because there was no information on this type of resource in the archival record or provided by any of the tribes that were contacted.

Please refer to "Master Response 4: Program Level Document" for an explanation of the program level analysis prepared for the plan. Neither the MTC Commission nor the ABAG Executive Board have the authority to require regional reporting or any other mitigation measures. This will fall under the land use authority of the lead agencies for future projects under the plan.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Comment O3-4
Tribal Cultural Resources Mitigation

The DEIR includes appropriate mitigation measures such as record searches, preservation in place, and the use of Tribal monitors. However, the approach relies heavily on surveys and treatment plans rather than prioritizing avoidance. In addition, the document does not clearly explain how Tribes will participate in project level decision making.

We recommend strengthening avoidance first language, establishing clear criteria for Tribal participation across project level work plans, and committing to annual reporting on Tribal Cultural Resource mitigation.

Response O3-4
As discussed in the Draft EIR the level of tribal involvement would be accommodated by the future lead agency for each individual project proposed under the plan and subject to mitigation measures in the Draft EIR. As included in Section 3.7.3 of the Draft EIR Mitigation Measures CUL/TCR-1, CUL/TCR-1, CUL/TCR-4(a), and CUL/TCR-4(b) would be required to reduce impacts to the greatest extent feasible. Mitigation would require a records search to determine if previous resources have been identified, monitoring areas of cultural significance, an evaluation of buildings 50 years in age, redesign of projects if feasible to avoid historic resources, and avoidance of tribal cultural resources if feasible. While the mitigation would reduce impacts to cultural and tribal resources, in some circumstances avoidance or preserving in place of a tribal cultural resource may be infeasible and would thus result in a significant impact.

Please refer to "Master Response 4: Program Level Document" for an explanation of the program level analysis prepared for the plan. Future individual development projects implemented under the plan would be required to go through their own CEQA process, which could require project specific mitigation such as preserving in place and the use of tribal monitors. Tribal consultation as applicable pursuant to

AB 52 would also be required as part of additional CEQA analysis for future projects under the plan.

Comment O3-5
Biological Resources

Long Term Monitoring

The DEIR demonstrates a clear understanding of the importance of protecting sensitive species, natural communities, and wildlife movement areas. The range of mitigation tools identified is commendable. However, long term monitoring requirements and implementation mechanisms are not clearly defined. Sustained monitoring, adaptive management, and consistent stewardship are essential for long term biological resource protection.

We recommend including the following.

- A defined long term biological monitoring program with specific timelines, responsible parties, and reporting requirements.
- Public reporting on habitat conditions, species trends, and mitigation status throughout implementation.
- A strong adaptive management framework that requires corrective actions when monitoring shows mitigation measures are not achieving intended outcomes.

Response O3-5

The Draft EIR acknowledges the potential for plan implementation to have impacts on biological resources. Where appropriate and required by regulations, the mitigation measures related to biological resources include requirements for long-term monitoring. For example, Mitigation Measure BIO-2 on pages 3.5-48 through 3.5-51 of the Draft EIR requires development of a restoration and monitoring plan if compensatory mitigation is required for impacts on state or federally protected wetlands or sensitive natural communities. Additionally, Mitigation Measure BIO-1(a) on pages 3.5-38 to 3.5-40 of the Draft EIR requires a monitoring program if compensatory mitigation for impacts on special-status plants is required. Finally, as noted in Mitigation Measure BIO-1(a), projects that could adversely affect federal or state candidate, proposed, threatened, or endangered species may be required to consult with applicable resource agencies and obtain incidental take permitting, which may require compensatory mitigation and associated long-term monitoring and adaptive management requirements. Due to the program level of analysis in the Draft EIR the details regarding future compensatory mitigation needs, including the location, type of resource, and extent of impacts, is not known, and therefore, the details of these monitoring programs (including long-term monitoring, reporting, and adaptive management) and public reporting would be determined at the project level. Please refer to "Master Response 4: Program Level Document" regarding the level of detail available for analysis in the Draft EIR.

Comment O3-6

Scale of Growth and Climate Adaptation

The regional vision presented in the DEIR successfully integrates housing, transportation, and climate adaptation. However, the twenty-five-year scope of the plan creates complex challenges for biological mitigation. Transportation improvements, housing development, and climate adaptation efforts will likely create numerous incremental impacts that, when combined, may exceed current projections.

We recommend the following improvements:

- Expand the cumulative impact analysis for biological resources to reflect the combined effects of long-term development and adaptation projects.
- Establish regional thresholds that trigger additional mitigation when cumulative impacts exceed projections or when habitat fragmentation increases.
- Develop regionwide biological resource coordination agreements to improve consistency across implementing agencies.
- Create a clear adaptive management requirement that mandates corrective action when mitigation outcomes fall short of expectations.

Response O3-6

The cumulative impact discussion related to biological resources on page 5-14 of the Draft EIR concluded that implementation of the proposed plan would contribute considerably to cumulative impacts on biological resources, and that the cumulative impact would be significant. The analysis also concluded that Draft EIR mitigation measures related to biological resources may not be sufficient to reduce impacts to a less-than-significant level in all cases, and as a result that the cumulative impact on biological resources would be significant and unavoidable. Please refer to "Master Response 2: EIR Mitigation Measures" regarding significant and unavoidable impacts.

Comment O3-7
Environmental Justice Considerations

The DEIR acknowledges the importance of affordability, diversity, and equitable access. These goals support healthier and more resilient communities. However, the DEIR does not consistently evaluate whether the plan's physical environmental impacts may fall disproportionately on disadvantaged communities, Indigenous residents, or communities of color.

Under the California Environmental Quality Act, agencies must evaluate physical impacts that may disproportionately affect vulnerable communities. This includes air quality, hazards, noise, transportation related effects, and cumulative impacts. While CEQA does not require a separate environmental justice chapter, analysis of disproportionate impacts must be incorporated into relevant impact sections. In the current DEIR, these discussions are limited or absent in areas where they are necessary.

We recommend the following actions.

- Integrate environmental justice considerations into each topical section where relevant.
- Identify Equity Priority Communities, Indigenous communities, and other vulnerable populations within each analysis area and evaluate whether they are more susceptible to projected impacts.
- Provide a clear discussion of how transportation investments, land use changes, and climate adaptation measures may increase or reduce environmental burdens in specific communities.
- Strengthen cumulative impact analysis by evaluating how new environmental burdens may compound existing inequities.
- Commit to meaningful engagement with Indigenous communities, communities of color, and low-income residents throughout implementation.

Response O3-7
The actions requested in the comment do not pertain to CEQA's required scope of environmental analysis. CEQA requires an EIR to evaluate physical environmental impacts of a proposed plan or project. An evaluation of environmental justice impacts is not required by CEQA because it is not an impact to the natural or physical environment. As a program-level document, the Draft EIR does not provide community-level impact analysis for every location where mapped planning geographies may overlap; instead, it evaluates regional-scale effects and discloses programmatic mitigation measures and implementation strategies, where feasible. The regional-scale analysis in the Draft EIR encompasses potential impacts on Equity Priority Communities (EPCs), Indigenous communities, and other vulnerable populations if these communities overlap with the planning geographies. Specifically. the proposed plan's physical impacts associated with air pollution, noise, and hazardous exposures, and transportation are discussed in Section 3.4, "Air Quality," Section 3.12, "Noise," and Section 3.9, "Hazards and Wildfire," and Section 3.15, "Transportation," respectively. Impacts related to displacement are discussed in Impact LU-4 in Section 3.11, "Land Use, Population, and Housing," of the Draft EIR. Cumulative impacts are discussed in Section 5.4, "Cumulative Impacts" of the Draft EIR. The comment does not identify a specific physical environmental impact that was omitted from the Draft EIR or an impact that would be significant due to disproportionate effects on a particular community. Therefore, no revisions to the Draft EIR are warranted.

As described in the Draft Engagement Report for the Plan Bay Area 2050+, MTC and ABAG conducted focus groups with staff from 15 community-based organizations representing the Bay Area's EPCs to garner input on current outreach methods and request ideas for new and innovative strategies. To advance equitable community engagement, staff prioritized reaching the region's EPCs. Approximately 80 out of

the 120 Plan Bay Area 2050+ engagement events and activities were either located in or served EPCs. As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," Plan Bay Area 2050+ implementation is supported through ongoing coordination with local jurisdictions and other partners. MTC and ABAG will continue ongoing coordination with EPCs during plan implementation.

Comment O3-8

Final Thoughts

Long Heritage appreciates the extensive work that went into the DEIR and recognizes the complexity of developing a long-term regional plan that integrates housing, transportation, environmental resilience, and community wellbeing. Our comments are intended to support a transparent, inclusive, and durable planning process that will serve future generations. We remain available to assist with future consultation efforts or community engagement related to cultural heritage, environmental stewardship, and long-term planning.

Thank you for considering our comments and for your continued commitment to planning a resilient and inclusive future for the Bay Area.

Response O3-8

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O4 Construction Trades Workforce Initiative

Beli Acharya, Executive Director
December 10, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O4-1

Construction Trades Workforce Initiative appreciates the opportunity to provide comments on the Plan Bay Area 2050 Implementation Plan. CTWI is the nonprofit partner of the East Bay Building Trades, working to ensure the long term sustainability of the construction industry by bridging the gap between union construction labor and key stakeholders.

CTWI represents Alameda, Contra Costa and Napa-Solano Building & Construction Trades Councils (BTCs). The three BTC's together represent a coalition of over 30 affiliated unions representing workers in various construction trades throughout the East Bay. Together, CTWI and the three BTC's act as the collective voice of construction trade labor.

Our feedback and recommendations can be found below. Please note that our recommendations have significant overlap with the recommendations of our partner organization, Rising Sun Center for Opportunity, and we recommend that MTC/ABAG also reference their comments.

Response O4-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O4-2
Overarching Feedback for the Entire Plan

We appreciate that affordability is one of the central focuses of Plan Bay Area 2050, but would note that affordability is a function of both costs and wages. Creating high road jobs that pay family-sustaining wages and offer a clear pathway for economic mobility is half the challenge of addressing affordability.

- We urge MTC/ABAG to incorporate the creation of Quality High Road Jobs as a core feature of the Vision, and to weave this principle throughout the Elements, Themes, and Strategies of the plan.
- As a foundational principle, all public investments that utilize public dollars within the scope of this plan should explicitly include the creation of quality high road jobs as a stated objective.

Feedback by Plan Section

Executive Summary (Page 2)

Per the suggestion above, we request that the Executive Summary be revised to highlight the importance of quality high road jobs as a regional priority. This should be featured prominently alongside the plan's focus on housing, climate, and other topic areas.

Vision (Page 6)

The current Vision states, "Vibrant: The Bay Area is an innovation leader, creating job opportunities."

We request this statement be amended to specify the quality of the jobs being created:

> "Vibrant: The Bay Area is an innovation leader, creating quality high road jobs that pay family-sustaining wages and offer a clear path to economic mobility."

Housing Strategies (Page 9 and Pages 83-86)

- Strategy H4: Build Adequate Affordable Housing to Ensure Homes for All

We request that H4 be modified to incorporate the high road job principle for public construction projects:

> H4: Build affordable housing utilizing high road construction labor and Project Labor Agreements (PLAs) to ensure quality jobs are created, while ensuring homes are available for all Bay Area residents.

Economy Strategies (Page 10 and Pages 87-89)

We recommend a shift in focus from aspirational, long-term programs to concrete, achievable strategies that generate economic mobility through high-quality employment.

- Strategy EC1: Implement a Statewide Guaranteed Income
    - While we admire the ambition of this strategy, we do not view it as a practical and achievable strategy for this planning cycle. We urge the MTC/ABAG to place more emphasis on creating economic mobility for all residents through high-road strategies as defined by the California Workforce Development Board, especially for construction, manufacturing and other industries that can support family sustaining jobs.
    - The plan should emphasize construction jobs that are family-sustaining and provide prevailing wages - these are tangible and concrete actions the region can promote now.

This includes all jobs associated with public programs and prioritizing prevailing wage construction labor.

- Strategy EC2: Expand Job Training and Incubator Programs
    - This strategy should be explicitly uplifted to promote and expand existing high road job training models. Specifically, the plan should prioritize and partner with Joint Labor Management Apprenticeship and pre-apprenticeship programs and union apprenticeship training programs, where participants earn while they learn and receive high-quality, structured classroom and on-the-job training.
    - The State of California has established High Road Training Partnerships (HRTPs) to develop high road strategies across various industries. The region should be embracing this state initiative, working in partnership, and incorporating the High Road principle into its priorities, particularly within the execution of EC2.
- New Strategy EC7: Use High Road Labor Standards
    - We suggest the addition of a new Economy Strategy: Use high road labor standards and targeted hire policies to generate significant economic mobility from regional investments in transportation, housing, and environmental infrastructure projects.

Environmental Strategies (Page 10 and Pages 90-96)

We recommend incorporating a strategy that links climate action with job quality.

- We suggest the inclusion of a strategy around high road public programming for the decarbonization of the existing building stock. This program should encourage the utilization of direct install programs with high road labor standards and aggregation to effectively decarbonize buildings in low-income neighborhoods, ensuring a just transition for workers.

Leveraging Partnerships and Prioritizing Actions (Page 119)

We strongly encourage the MTC/ABAG to prioritize leveraging partnerships with local Building Trades Councils as a key strategy, particularly concerning infrastructure construction and affordable housing development, to ensure that all work is executed as a high road project.

Please let us know if you have any further questions, and thank you for your consideration.

Response O4-2

The commenter's recommendations are noted. The proposed plan strategies may be refined over time based on changing conditions and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision and implementation priorities. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. These statements are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Letter O5 Central Neighborhood Association of San Mateo

Laurie Watanuki
December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O5-1

Dear MTC and ABAG Boards,

The Central Neighborhood Association of San Mateo submits these comments on the Plan Bay Area 2050+ Draft Environmental Report (DEIR).

Response O5-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O5-2

1. Growth Forecasts (DEIR Table 2-14)

MTC's Bay Area population forecast with a growth rate of 24% is significantly higher than the growth rate published by the California Dept of Finance (DOF) at 6.5%. The DEIR does not clearly disclose the assumptions, data sources, or modeling method that disclose these discrepancies. We request that staff provide documentation of demographic methodologies, reconcile differences with DOF projections; and conduct analysis that reflect alternative growth scenarios. Please show the historic percentage growth rate over the last 25 years to provide historic context for the growth rate. The impact analysis must be adjusted to reflect an appropriate growth rate.

Response O5-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment O5-3

1. Grade Separations for Caltrain and High Speed Rail - Transportation (3-15-4)

    a. The DEIR states that High Speed Rail is planned to bring revenue operations during the timeframe of the proposed plan. Please provide additional information on the grade separations being proposed for Downtown San Mateo and other cities in the DEIR. We are concerned that the grade separations will bring more degradation to the Central and North Central Neighborhoods, which are located between the railroad tracks and the US 101 Freeway. Caltrans has limited the number of entrances to US 101 and we have too much vehicular traffic and trucks being funneled to the 101 South/4th Avenue entrance through 4th and 5th Avenues and Humboldt Street our residential streets. The DEIR should provide some analysis of these effects.

    b. How many grade separations are you planning to build in Downtown San Mateo at the cost of $1 Billion each (price of Broadway Burlingame's Grade Separation)? Where are the funds coming from for these 6 grade separations in Downtown San Mateo? The project description is inadequate and should include this information on grade separations for Downtown San Mateo along with other cities for High Speed Rail.

Response O5-3

The proposed plan and Draft EIR do not include detailed, project-specific information regarding individual Caltrain or High-Speed Rail grade separation projects, including precise locations, designs, construction approaches, or localized neighborhood circulation effects. Grade separation project details—including the specific location, size, design, timing, and construction approach—would be determined on a project-by-project basis by the responsible project sponsors and implementing agencies.

The Draft EIR evaluates the proposed plan at a programmatic level. Because individual grade separation projects are not defined at the level of design and engineering necessary to support project-specific analysis, the Draft EIR does not provide a detailed evaluation of project-specific circulation impacts associated with grade separations, including localized cut-through traffic conditions. When specific grade separation projects are proposed, they would be subject to separate planning, engineering, and project-level environmental review by the responsible lead agencies, as applicable. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis.

In addition, the proposed plan does not program or allocate funding to specific projects. As described in "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," potential future infrastructure projects would depend on future actions and programming decisions by responsible agencies, and could involve a range of local, regional, state, and federal funding sources.

Comment O5-4

c. The EIR should provide additional analysis of the significant adverse effects on surface streets from the proposed growth. Our goal is to have walkable and bikable neighborhoods with Vision Zero and reduce the cut-through traffic and truck impacts to and from US 101. In 1960, the US 101 Bayshore Highway had 2 lanes and today we have 12 lanes, in addition to the proposed 101/92 connector project which will add more lanes with no bridge expansion. Please identify and analyze better alternatives instead of grade separations, which generate more vehicular and truck cut-through traffic on neighborhood streets and add more traffic to 101. The EIR should identify mitigation that might include use of the state highways: El Camino Real to CA 92 to US 101 and tunneling for High Speed Rail through Downtown San Mateo.

Response O5-4

Consistent with Appendix G of the State CEQA Guidelines, Impact TRA-1 in the Draft EIR evaluates impacts on alternative modes of transportation and Impact TRA-3 evaluates whether the proposed plan would substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). The proposed plan is consistent with regional, State, and federal transportation policies that emphasize directing growth to infill areas and expanding multimodal transportation options in order to reduce vehicle dependence, improve safety, and enhance mobility and access. The plan also aligns with MTC programs and coordinated regional efforts, and its implementation would not substantially conflict with adopted circulation policies for roadways, transit, bicycle, or pedestrian facilities (Impact TRA-1).

The EIR additionally concludes that the proposed plan would not adversely affect the design or safety of transportation facilities. Planned transportation investments are intended to incentivize roadway design improvements that enhance safety and reduce hazards, consistent with Vision Zero and Complete Streets policies and objectives, rather than increase neighborhood traffic hazards or incompatible roadway uses. Accordingly, the proposed plan is not expected to substantially increase cut-through traffic, truck traffic, or traffic hazards on local streets (Impact TRA-3). Therefore, no mitigation is required under CEQA. Please refer to Impacts TRA-1 (pages 3.15-18 through 3.15-22) and TRA-3 of the Draft EIR (pages 3.15-30 through 3.15-31) for the discussion of impacts related to bicycle and pedestrian facilities and transportation safety, respectively.

Comment O5-5

d. The growth will increase air pollution in neighborhoods adjacent to highways and cause significant adverse effects on vegetation and public health. This DEIR encourages gentrification in low income areas and will once again cause people to relocate. We need additional mitigation measures such as higher sound walls and tall trees along the west side of the 101 from 4th Avenue to CA 92 to reduce the toxic air pollution, diesel particulates, and traffic noise. The 101 sound wall is only 9 feet in height at 9th Avenue in San Mateo. Truck exhaust pipes are 11-14 ft in height, which exceed the sound wall height. Residential neighborhoods next to 101 need more protection from greenhouse gases.

Response O5-5

As a program-level document, the Draft EIR does not provide project-level impact analysis for every location where mapped planning geographies may overlap; instead, it evaluates regional-scale effects and discloses programmatic mitigation measures and implementation strategies, where feasible. Please refer to "Master Response 4: Program Level Document" regarding program level analysis. Impacts related to air quality are included in Section 3.4, "Air Quality," of the Draft EIR. Impact AQ-4 includes an analysis of sensitive receptors exposure to pollutant concentrations. As discussed in the impact analysis, although exhaust-related emissions would decrease in both Overburdened Communities and non-Overburdened Communities, total PM2.5 emissions would increase in the plan area as would total PM2.5 emissions in the multiple Overburdened Communities. Therefore, Mitigation Measures AQ-4(a) through AQ-4(d) would be required to reduce impacts through implementation of measures such as HVAC systems with minimum efficiency reporting value filters, development of a program to install air filtration devices, provide incentives to replace older locomotives and trucks in the region, and identify strategies in the CARB Technical Advisory. However, site-specific analysis would be needed when a future project under the plan is proposed in the plan area to determine the actual level of exposure and whether feasible mitigation exists for the project to implement to reduce its level of cancer risk exposure. Because MTC and ABAG cannot require local implementing agencies to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation future site specific, impacts were determined to be significant and unavoidable.

Impacts related to traffic noise are discussed under Impact NOISE-2 in Section 3.12, "Noise," of the Draft EIR. Traffic noise impacts associated with implementation of the proposed plan were assessed at the county level. Specifically, the traffic noise analysis modeled 24-hour community noise equivalent level (CNEL) traffic noise levels using outputs from Travel Model 1.6. Modeled traffic noise levels are based on average daily traffic volumes occurring on every road type (i.e., freeway, expressway, arterial, collector) throughout each county within the plan area. Within San Mateo County, freeway traffic noise is anticipated to decrease by 1.2 decibels (dB) and expressway traffic noise is anticipated to increase by 1.3 dB.

As discussed in Impact NOISE-2, implementation of the proposed plan would result in potentially significant impacts related to traffic noise. Implementation of Mitigation Measure NOISE-2(a) would address traffic noise increases that exceed applicable noise thresholds for each roadway type (i.e., 70 A-weighted decibels [dBA] CNEL, for major roads/freeways, 65 dBA CNEL for all other roads, or as otherwise defined in applicable local noise standards) through the implementation of measures based on project- and site-specific considerations to achieve noise levels in accordance with applicable local noise standards. Such measures could include landscaped berms, reduced-noise paving materials, construction of noise barriers, and buffers. However, because MTC and ABAG cannot require local implementing agencies to adopt this mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation, this impact would be significant for purposes of this program-level review. Please refer to "Master Response 2: Mitigation Measures" and Impact NOISE-2 of the Draft EIR (pages 3.12-25 through 3.12-32) for a discussion of impacts related to traffic noise.

Comment O5-6

1. Alternatives to the Proposed Plan (Table 3.34: Summary Comparisons pf EIR Impacts)

    a. The EIR identifies 67 impacts in the 14 categories of an EIR. Thirty-five of them (52%) are rated as "Significant and Unavoidable ". Many are cushioned in the language of "if feasible", in a move that reduces regional accountability by transferring responsibility from regional planners, developing this Program EIR to local jurisdictions who are responsible for project specific plans. The Plan does not address growth-induced local impacts, including emergency evacuations, solid-waste and utility capacity, other stresses on infrastructure, and aesthetic degradation of lower income residential neighborhoods and historic downtowns.

Response O5-6

Please refer to Response A16-4 and “Master Response 2: EIR Mitigation Measures” regarding significant and unavoidable impacts in the Draft EIR. Growth inducing impacts are analyzed in Section 5.3, “Growth-Inducing Impacts” of the Draft EIR. The analysis examines growth inducing impacts related to implementation of the proposed plan and fostering population growth and construction of housing; elimination of obstacles to population growth; fostering economic growth; affects of services levels, facility capacity, and infrastructure demand; and encouraging or facilitating other activities that could significantly affect the environment. Impacts related to emergency evacuations are included in Section 3.9, “Hazards and Hazardous Materials,” impacts related to solid waste and utility capacity are included in Section 3.14, “Public Utilities,” and impacts related to aesthetics are included in Section 3.2, “Visual Resources” of the Draft EIR.

With respect to the comment about transferring responsibility, the proposed plan is a long-range regional policy and planning framework intended to guide future decision-making, coordination, and investment priorities. The plan does not override local land use authority and does not impose mandates on local jurisdictions. Please refer to “Master Response 7: Regional Coordination, Partnerships, and Local Implementation.”

Comment O5-7

b. The DEIR itself indicated it needs huge new sources of revenue. Are the taxpayers paying for this with more ballot measures to increase taxes and "fees"? As far as we can tell, hundreds of billions will be required for transportation, housing, and protection against sea-level rise. Has this DEIR been subjected to financial review? Have the funding shortfalls been adequately disclosed?

Response O5-7

As described in “Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources,” Plan Bay Area 2050+ is a long-range regional policy framework and is not a financing plan or financial programming document. Adoption of the proposed plan does not impose taxes or fees, approve ballot measures, or commit MTC, ABAG, or local jurisdictions to specific expenditures. While the proposed plan identifies planning-level investment needs and discusses potential future funding concepts, it does not guarantee that prospective funding sources—including those requiring future legislative action, voter approval, or appropriations—will be secured.

Comment O5-8

4. Historic Resources (Pages 3.7.17 - 3.7.18)

The Yoshiko Yamanouchi House Historic District is located at 1007 East 5th Avenue, San Mateo, California. The Historic District is listed on the State and National Register of Historic Places and is also listed on the Asian American and Pacific Islanders Register. This property meets the description outlined in the EIR in the Bay Area 2025 Plan for Criterion A & B. The Yoshiko Yamanouchi House is located near

the entrance of the 101 freeway between 4th and 5th Avenues, and South Humboldt Street in the Central Neighborhood in San Mateo. The Yoshiko Yamanouchi House will be significantly affected by the adverse environmental impacts of air pollution, diesel particulates, truck vibrations, and noise from Plan Bay Area 2050 +. The pollution and vibrations will significantly affect the historic resources, including fences, trees, and gardens. The impacts will have adverse effects on the health of the plants and deteriorate the wood and materials of the historic resources. There have been 6 Katsura bamboo thatched fences and 7 sliding raindoors impacted by truck vibrations, air pollution and diesel soot. These have been rebuilt. The materials for the Katsura Building, Walkway and Katsura Garden were brought from Japan and the workmanship provided by craftsmen from Japan. This structure represents 17th Century Japanese Imperial Architecture. The 16th Century Japanese style Hill and Pond garden on 5th Avenue has been impacted by heavy truck vibrations, diesel soot, tree branches hit, and the cemented boulders have fallen into the pond and repositioned back in place. Please identify mitigation measures to avoid or reduce these significant effects. The National Register of Historic Places Registration documentation for the Yoshiko Yamanouchi House was submitted to MTC/ABAG vi e-mail on 12/3/25 and a bound copy sent on 12/15/25 via FEDEX.

Response O5-8

As included on page 3.7-26 of the Draft EIR the EIR prepared for the plan is a program-level of analysis. Please refer to "Master Response 4: Program Level Document" for a discussion of the level of analysis completed for the Draft EIR. Project-specific reviews and field studies for cultural resources were not conducted because details related to the location, size, design, or setting of specific projects are unknown and, therefore, a more detailed and meaningful evaluation could not occur at this time. A potentially significant impact was identified for historical resources (Impact CUL/TCR-1) and Mitigation Measure CUL/TCR-1 is included in the Draft EIR to guide the identification and protection of historical resources during future project reviews. For example, future projects under the plan would be required to survey and evaluate buildings and structures greater than 50 years in age to determine their eligibility and implement recommendations from the study.

Comment O5-9

5. Renter Protections - Chapter 2 - Project Description - Housing - (Strategy H1)

More tenant protections and limits on rent increases that exempt new construction do not belong in the Plan Bay Area 2050 + DEIR. This is a local decision for each city and creates more future problems for those who own rental properties. Please remove these references to more tenant protections in the Plan Bay Area 2050+.

Response O5-9

As discussed on page 2-6 of the Draft EIR, tenant protections are one of the proposed plan's regional policy strategies to protect current residents from displacement and preserve existing affordable housing. The Draft EIR references tenant protections to the extent necessary for evaluating the potential environmental effects of implementing the proposed plan's strategies at a programmatic level. However, local government agencies retain discretion to adopt such protections consistent with their authority. Please refer to "Master Response 7, Regional Coordination, Partnerships, and Local Implementation" regarding local land use control.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O6 Neighborhoods United San Francisco

Lori Brooke, Co-founder
December 16, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O6-1

Dear MTC and ABAG Board Members,

Thank you for the opportunity to comment on the Plan Bay Area 2050+ Draft Environment Impact Report (the Plan). Neighborhoods United San Francisco (NUSF) is a coalition of long-established neighborhood groups, civic organizations, and merchant associations that partners with communities and neighborhoods throughout the city to promote equitable growth, protect valuable resources, provide for public input, and prevent displacement.

For the reasons set forth below, we believe the Plan is based on flawed and inaccurate assumptions that therefore lead to misleading conclusions for the nine-county Bay Area region. The failure to legitimately assess future population and employment trends must be corrected prior to issuing the Final EIR.

Response O6-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O6-2

<u>MTC/ABAG Growth Forecasts for the Bay Area are Overstated and Significantly Diverge from Standard and Recognized Projection Practice</u>

Using growth projections developed in-house MTC/ABAG forecast a Bay Area population increase of 24.1% from 2025 to 2050: a projection nearly 10 times greater than the growth rate for the rest of California (2.5%). Based on a number of faulty assumptions, the MTC/ABAG forecast far exceeds the population growth projected by the state's own Department of Finance (DOF), Demographic Research Unit (DRU), of 6.4% Bay Area growth from 2025 to 2050. The DRU is the official source of demographic data for the State of California, and California law requires DRU projections be used for specific purposes, including for the allocation of state funds.

In an analysis of the MTC/ABAG growth projections by independent researcher Gaetan Lion, he identifies their omission of the three fundamental demographic drivers that determine population change: births, deaths, and net migration. Lion further reveals that the MTC/ABAG Regional Growth Forecast relies exclusively on a model known as the REMI (Regional Economic Models, Inc.) Policy Insight+ model, which is an economic model, not a demographic one and states that:

> *MTC/ABAG's Plan Bay Area 2050+ projections suffer from a cascade of unrealistic assumptions that compound into a fundamentally flawed forecast. The problems operate on multiple levels, each reinforcing the others to produce projections divorced from reality.*
>
> ....
>
> *The path forward requires intellectual honesty. MTC/ABAG should return to first principles: What do the region's demographic fundamentals actually suggest? What employment growth is realistic given structural economic changes? What migration patterns are sustainable given housing costs*

and remote work trends? Only by confronting these questions directly can planners develop projections worthy of the policy decisions they will inform.

(https://medium.com/@gaetanlion/abags-bay-area-population-projections-are-way-too-high-8ac2c861fc2e).

Response O6-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment O6-3

The REMI Model Applied by the MTC/ABAG Avoids Full Accounting of the Impacts from a High Office Vacancy Rate, Remote Work Opportunities, and the Potential for Job Loss Due to Artificial Intelligence (AI).

The MTC/ABAG methodology does not fully take into account the conditions of the Bay Area work force. Commercial vacancy rates remain high in the region as a roughly 30% office vacancy rate in San Francisco demonstrates. Nor does the MTC/ABAG approach adequately account for this soft office market combined with the sustained popularity of remote work, leading to out migration in a housing market as expensive as the Bay Area. Finally, the impacts of AI and the very real prospect of job loss in myriad sectors, has not been incorporated into these overly optimistic projections.

Response O6-3

Please refer to "Master Response 1: Regional Growth Forecast," regarding the regional growth forecast methodology Employment forecasts typically reflect broader macroeconomic and industry dynamics. MTC and ABAG acknowledge that conditions such as remote work patterns, office market changes, and evolving AI-related productivity and job impacts remain uncertain and are continuing to evolve. Refer to Response A3-6 regarding office vacancy rates.

Comment O6-4

Conclusion

The application of non-standard growth projections and resulting inconsistencies raise serious concerns about the plausibility of the Draft Plan's regional assumptions. For these reasons, we believe MTC/ABAG must use standard and accepted modeling methodologies, such as those from the California Department of Finance (DOF) and Demographic Research Unit (DRU), to forecast realistic demographic and employment projections. A revised forecast will also include inclusion of the region's office vacancy rates, remote work trends and impacts to the work force from AI. The unrealistic growth projections upon which this Plan is based threaten the functionality, effectiveness and fiscal health of every municipality required to comply. The DEIR must be revised accordingly.

Response O6-4

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O7 Coalition for San Francisco Neighborhoods

Deborah Murphy, President
December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O7-1

Dear MTC and ABAG Board Members,

I believe the Plan is based on flawed and unrealistic assumptions. The failure to use accurate data projections for future population growth and employment trends must be corrected prior to issuing the Final EIR.

The growth projections forecasting a 24% population increase in the Bay Area is almost 10 times higher than the growth rate for the 2.5% projected for the entire state of California. Based on a number of faulty assumptions, the MTC/ABAG forecast far exceeds the population growth projected by the state's own Department of Finance (DOF), Demographic Research Unit (DRU), of 6.4% Bay Area growth from 2025 to 2050. The DRU is the official source of demographic data for the State of California, and California law requires DRU projections be used for specific purposes, including for the allocation of state funds.

Commercial vacancy rates remain high in the region as a roughly 30% office vacancy rate in San Francisco demonstrates. Nor does the MTC/ABAG approach adequately account for this soft office market combined with the sustained popularity of remote work, leading to out migration in a housing market as expensive as the Bay Area. Finally, the impacts of AI and the very real prospect of job loss in myriad sectors, has not been incorporated into these overly optimistic projections. The DEIR must be revised.

Response O7-1

Please refer to "Master Response 1: Regional Growth Forecast," regarding the methodology used for the plan's regional growth forecast.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter O8 Citizen Marin

Amy Alish, Director
December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O8-1

Dear MTC and ABAG Boards,

Having reviewed the DEIR available for public comment, I am sorry to say I'm appalled at the level of planning being done without basis in reality.

A huge number of significant and unavoidable environmental impacts could likely be avoided if an alternate plan utilized the authoritative DOF DRU population projections. In the name of common sense and stewardship, I urge you to bring your documents in line with currently known basic facts.

Response O8-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth and "Mater Response 2: EIR Mitigation Measures" regarding the EIR's significant and unavoidable impact determinations.

Comment O8-2

Plan Bay Area 2050+ Draft Environmental Impact Report (DEIR).

There are three issues that stand out as requiring clarification or correction to ensure the DEIR meets CEQA standards for accuracy and transparency.

1. Growth Forecasts (DEIR Table 2-14)

MTC's population forecast is way too high. Please check it against the California Department of Finance (DOF) — the supposed authority — growth numbers of 6.5%. Like 6th Cycle RHNA itself (according to the DOF audit) this DEIR does not clearly disclose the assumptions, data sources, or modeling methods that explain these discrepancies. The public should have access to the methodology used. Otherwise it seems that numbers are being created to fit the desired outcomes. That is not stewardship. With no other alternative scenarios, we are looking at an ungrounded fait accomplis.

Response O8-2

Please refer to "Master Response 1: Regional Growth Forecast" for discussion of the data sources, adopted methodology, and statutory planning purpose of the regional growth forecast used in Plan Bay Area, including how it differs from Department of Finance population projections. Master Response 1 also addresses comments requesting clearer disclosure of demographic methodologies, reconciliation of differences between Plan Bay Area and Department of Finance projections, and consideration of uncertainty affecting long-range growth assumptions.

Comment O8-3

2. Building Industry Association Settlement Agreement Components and Compliance Information. (Play Bay Area Introduction, (1.7.4 "2013 Settlement Agreement") and Table 1.1

What is the public to make of the settlement creating "ongoing obligations" for MTC and ABAG? *How has a for-profit industry been able to insert itself into our housing assumptions?* How does the obscured litigation settlement affect local infrastructure capacity, displacement, or affordability? Without details about the settlement, the public sees a government agency unable to evaluate whether PBA's assumptions reflect a realistic necessity or simply policy preference. How were these numbers pulled into our RHNA, which we know is way overblown? If we have a severe housing crisis, it is empirically in lower income categories, not the market rate units that account for 40% of our (unfunded) mandates.

Response O8-3

Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" regarding the settlement agreement with the Building Industry Association.

Comment O8-4

3. Alternatives to the Proposed Plan (Table 3.34: Summary Comparison of EIR Impacts)

The EIR identifies 67 impacts in the 14 categories of an EIR. Thirty-five of them (52%) are rated as "Significant and Unavoidable." With no alternative plans, how do we know that these significant and unavoidable impacts are indeed necessary? The RHNA has already saddled our localities with unconscionable decisions regarding the siting of housing in known FHSZ, areas without evacuation access — even those that could be further blocked by development "downstream." We no not have a

sustainable water supply, and our energy demands are likely to outgrow capacity with the rise of data centers. We can't predict the toll data centers will take on the water supply, as a law to track that usage was recently vetoed. Our area (Marin) like others with similar topography, does not lend itself to the scale of transit and development proposed.

Response O8-4

Please refer to Response A16-4 and "Master Response 2: Mitigation Measures" regarding significant and unavoidable findings in the Draft EIR. Impacts from the proposed plan related to water supply are analyzed in Section 3.14, "Public Utilities and Facilities" and impacts related to energy are included in Section 3.6, "Climate Change, Greenhouse Gases, and Energy" of the Draft EIR.

Comment O8-5

In summary, MTC/ABAG Commissioners should direct staff to provide corrected or supplemental information so members of the public can have some degree of confidence that your agencies actually understand the implications of the PBA 2050, in a changing landscape.

Response O8-5

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O9 Catalysts for Local Control

Susan Kirsch, Founder
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O9-1

Dear MTC and ABAG Boards:

Catalysts for Local Control submits the following comments regarding the **Plan Bay Area 2050+ Draft Environmental Impact Report (DEIR).**

This communication identifies three deficiencies in the DEIR that must be addressed and remedied in the FEIR in order to satisfy CEQA standards and legal compliance.

First, the MTC population growth forecasts in DEIR Table 2-14 are flawed, especially in comparison with California Department of Finance (DOF) projections. The FEIR needs to re-evaluate all environmental impacts using the DOF projections.

Second, the DEIR is deficient in its analysis of the Building Industry Association Settlement Agreement Components and Compliance Information (DEIR Table 1-1 and Plan Bay Area Introduction, 1.7.4 "2013 Settlement Agreement").

Third, the Plan's proposed mitigation measures are inadequate. (DEIR Table 4-34: Alternatives to the Proposed Plan: Summary Comparison of EIR Impacts)

Response O9-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth, "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" regarding the Building Industry Association Settlement Agreement, and "Master Response 2: Mitigation Measures" regarding mitigation measures contained in the EIR.

Comment O9-2

1. MTC's Growth Forecasts Are Flawed (DEIR Table 2-14)

This comment concerns DEIR Table 2-14 on page 2-29. MTC's population forecast with a growth rate of 24% from 2020 to 2050 is significantly higher than the growth rate derived from California Department of Finance (DOF) projections at 5.2%. The DOF figure is based upon Report P-2A: Total Population Projections for California Counties, July 1 2020-2070, with the data series prepared by the Demographic Research Unit in September 2025.
(See: https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P2A_County_Total.xlsx)

The DOF figure is based upon a nine-county Bay Area population of 7,747,408 in 2020, increasing to 8,149,816 in 2050 (a 5.2% increase). There is a very significant and material difference between the Plan Bay Area and DOF population projections, with Plan Bay Area projecting an additional 1.4 million population in 2050 than the DOF forecast.

The DEIR does not clearly disclose the assumptions, data sources, or modeling methods that explain these discrepancies. The FEIR should re-evaluate all of the environmental impacts throughout the plan using both the PBA (9,586,000 population in 2050) and the DOF (8,149,816 population in 2050) projections. The smaller Bay Area population in 2050 in the DOF projections should result in very significant differences in transportation- and housing-related environmental impacts.

Furthermore, the discussion of DEIR Table 2-14 does not adequately explain why the housing units growth forecast (39%) so greatly exceeds the population growth forecast (24%).

The employment growth projection is also flawed because an increasing number of employees work from home. For example, if an employee assigned to a Bay Area employer works 60 percent of the time from a home outside of the nine-county Bay Area, then just 0.4 of that employee should be attributed to the Bay Area employer. That should reduce the housing units growth forecast because it should reduce "the in-commute from outside the region." (p. 2-29.)

Remedial Action: We support the calls for further analysis identified by the Cupertino City Council, Lafayette City Council, Mill Valley City Council, and others. Along with other jurisdictions, community groups, and individuals, we request, and the law requires, that staff provide documentation of demographic methodologies and reconcile differences between MTC and DOF projections before adopting PBA2050+. As the flawed growth forecasts affect environmental impacts, the FEIR must address this issue. The FEIR should consider all environmental impacts under both the MTC and DOF population projections,

Response O9-2

As described in "Master Response 1: Regional Growth Forecast," the regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology designed for RTP/SCS planning and analysis purposes. While DOF projections are an important reference point, the Plan Bay Area forecast is not intended to be a status-quo demographic projection and reflects an integrated regional economic-demographic modeling approach.

The Draft EIR discloses the Plan Bay Area growth forecast and its use in evaluating environmental impacts, including in Table 2-14. The forecast methodology was adopted during Plan Bay Area 2050 and carried forward for Plan Bay Area 2050+ with updated inputs to reflect significant post-COVID demographic and economic conditions. As part of that update, MTC and ABAG produced lower long-term projections relative to the prior forecast, including reductions to projected population and households. As required by SB 375's mandate that the SCS house all economic segments of the population, the adopted methodology anticipates increases in housing supply at all income levels to curb housing price growth and create a healthier and more dynamic housing market in the Bay Area compared to today's conditions. The Plan Bay Area 2050+ Forecasting and Modeling Report provides additional details on the methodology and assumptions used to forecast both future housing and population growth.

The growth in households exceeds the growth in population because the household forecast uses headship rates, a measure of how many households are formed for different population age groups based on regional data. The projected older population is associated with on average smaller household sizes, and therefore more households overall for the same headline population count (i.e., total number of people living in a certain area). Additionally, common housing market health indicators such as overcrowding and overpayment both relate to the high cost of housing in the Bay Area, serving to limit household formation rates. The household forecast uses household formation rates gradually rolled back to rates from the early 2000s when prices were relatively lower. Together, these factors mean that the household growth rate is higher than the rate of overall population growth.

With respect to remote work and evolving employment trends, MTC and ABAG acknowledge that remote work patterns and longer-term productivity and labor market shifts continue to evolve and remain uncertain. Staff will continue to monitor these trends as additional data becomes available and consider them as part of future regional growth forecast updates. The plan accounts for higher work-from-home rates and assumes that they will stabilize at 25% of all workers on a typical workday by 2050. This prediction incorporates the sustained increase in remote work observed in 2023, where 27% of the Bay Area workforce worked from home, as well as more recent return-to-office trends. While work-from-home remains elevated, there is currently insufficient data available to support the conclusion that the jobs to housing relationship is sufficiently weakened to justify a reduction in the regional housing control total.

Comment O9-3

2. The DEIR is deficient in its analysis of the Building Industry Association (BIA) Settlement Agreement (Table 1-1)

A. This BIA Settlement Agreement Discussion in the DEIR is Inadequate.

1. Settlement-driven assumptions must be disclosed in the FEIR as part of the Program description and analytical baseline.

The DEIR acknowledges "ongoing obligations" arising from the 2013 Building Industry Association (BIA) Settlement Agreement, yet it does not include the Settlement Agreement itself or clearly explain how those obligations constrain or shape the Regional Housing Control Total (RHCT), forecasted development pattern, or related modeling and investment decisions. Nor does it explain the relationship between the RHCT and the Regional Housing Need Allocations (RHNA). This omission prevents meaningful public review and undermines the EIR's role as an informational document, contrary to *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1988) 47 Cal.3d 376.

Remedial actions:

First, the FEIR should include the full 2013 BIA Settlement Agreement, including any amendments or implementing documents, as an appendix to the FEIR, and summarize each operative obligation in the FEIR text, including duration, enforcement, and decision points.

Second, the FEIR should include a subsection titled **"Settlement Agreement Influence on Forecasting and Modeling"** that identifies which assumptions, inputs, and outputs are affected, including growth forecasts, RHCT, the "no increase in in-commuters" requirement, PDA/non-PDA distributions, and affordability assumptions.

Third, the FEIR should explain how the Settlement Agreement influences the combined RHCT and Regional Housing Needs Allocation (RHNA) framework, including any constraints on alternatives or policy.

2. The DEIR is deficient because it fails to link settlement obligations to environmental impact pathways.

Table 1-1 is deficient. It emphasizes procedural compliance, but does not analyze how settlement-driven assumptions affect environmental impacts. Assumptions regarding housing location, commuter patterns, and growth distribution directly influence VMT, GHG emissions, displacement risk, infrastructure demand, air quality, and community character. CEQA requires disclosure of the causal chain between project assumptions and environmental effects (*Communities for a Better Environment v. South Coast AQMD* (2010) 48 Cal.4th 310).

Remedial Action:

The FEIR should add a section tracing settlement-linked assumptions through the modeling process to environmental impact conclusions, identifying where those assumptions are material to impact findings and mitigation.

B. Table 1-1 Components Clarification in FEIR (Columns 6a-6d)

1. Explain and operationalize the "no increase in in-commuters" requirement (6a. Regional Housing Control Total and Forecasted Development Pattern)

Table 1-1 states that the Sustainable Communities Strategy (SCS) "shall have no increase in in-commuters over the baseline year" and that the RHCT must be determined before issuance of the Notice of Preparation. The DEIR does not disclose how this requirement was defined, measured, or applied.

At a minimum, the DEIR should identify the baseline year; define "in-commuter"; disclose data sources and methods; and explain how this constraint influenced scenario selection, land use assumptions, and transportation investments.

Remedial action:

First, the FEIR should provide definitions, baseline conditions, and calculation methods, along with quantitative results demonstrating compliance.

Second, the FEIR should analyze whether this requirement constrained the reasonable range of alternatives or redirected growth geographically, and evaluate the resulting environmental tradeoffs.

2. **Board-level approval of forecasts is necessary for enforceability and public review (6a. Regional Housing Control Total and Forecasted Development Pattern).**

Table 1-1 notes that the updated forecast "was not formally approved as a stand-alone item," but was instead incorporated into broader resolutions. Reliance on assumptions that lack clear, noticed adoption undermines transparency and public accountability, particularly where those assumptions form the basis of environmental analysis (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692)

Remedial action:

The FEIR should identify the RHCT and forecast assumptions used in the EIR and certify that they form the basis for environmental review, or explain why such approval is unnecessary.

3. **Disclose monitoring results and explain how they informed the DEIR (6b. Validation – Monitoring of Development Patterns).**

Table 1-1 states that MTC/ABAG monitored residential permitting in PDA and non-PDA areas and presented findings in May 2024 and through "Vital Signs." The DEIR does not summarize these results or explain how they informed the selected development pattern or impact conclusions. The link provided references meeting calendars rather than evidence of permitting activity.

Remedial actions:

First, the FEIR should summarize monitoring results directly in the DEIR, including permitting trends in PDA and non-PDA areas.

Second, the FEIR should identify thresholds that would trigger revisions to assumptions and explain whether monitoring results led to changes, or why no changes were made.

4. **Identify and summarize the feasibility analysis used for Plan Bay Area 2050+ (6c. Feasibility Analysis – PDA Feasibility Update).**

Table 1-1 indicates that the PDA Feasibility Analysis completed for Plan Bay Area 2050 continues to inform the 2050+ update. CEQA requires disclosure of whether feasibility =constraints materially affect project assumptions or shift impacts elsewhere (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645)

Remedial actions:

First, the FEIR should identify the specific feasibility analysis document(s), publication date(s), and public access location(s), and summarize findings relevant to the 2050+ development pattern.

Second, the FEIR should describe how feasibility findings influence RHNA setting and related growth assumptions.

5. **Consolidate and disclose key modeling assumptions (6d. Assumptions and Disclosure).**

Table 1-1 indicates that assumptions were disclosed across multiple stages and resolutions. For CEQA compliance, assumptions that drive environmental modeling must be clearly identified and presented in one place.

Remedial actions:

First, the FEIR should add a consolidated **"Key Modeling Assumptions and Descriptors"** table, including growth forecasts, RHCT, development distribution rules, affordability assumptions, transit service levels, and pricing assumptions.

Second, the FEIR should identify areas of uncertainty and include sensitivity analysis where appropriate.

C. The FEIR Needs to Include a Mitigation Monitoring and Reporting Program in Oder to Cure Deficiencies With the Settlement Agreement Analysis in the DEIR.

Because Table 1-1 identifies ongoing obligations, the Program EIR should include enforceable commitments comparable to a Mitigation Monitoring and Reporting Program.

Remedial action:

In the FEIR, ABAG/MTC should commit to periodic monitoring and public reporting relating to the Settlement Agreement, identify responsible agencies, establish thresholds for reassessment, and explain how monitoring will inform plan updates.

D. The Deficiencies With the Settlement Agreement Analysis Are So Significant That MTC/ABAG Needs to Recirculate the DEIR.

The DEIR is deficient because it fails to disclose how the Settlement Agreement materially influences growth assumptions, modeling inputs, and environmental impact conclusions. The deficiency deprives the public and decision-makers of the information necessary to evaluate the Project as required by CEQA.

Courts have consistently held that an EIR must disclose and analyze the "whole of the action," including constraints that meaningfully shape project design and environmental outcomes *(Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1988) 47 Cal.3d 376; Communities for a Better Environment v. South Coast AQMD (2010) 48 Cal.4th 310).

A revised DEIR needs to add the Settlement Agreement and clarify how it constrains the Regional Housing Control Total (RHCT), growth distribution, or "no increase in incommuters" requirement, or revise modeling assumptions or conclusions as a result. Such changes would constitute **"significant new information"** under CEQA Guidelines §15088.5. In that circumstance, recirculation of the DEIR (or a revised DEIR section with adequate review time) is required (*Vineyard Area Citizens v. City of Rancho Cordova* (2007) 40 Cal.4th 412)

These omissions materially affect impact conclusions, mitigation, and/or the range of alternatives. **Recirculation is therefore necessary now** to ensure CEQA compliance.

Remedial action:

MTC/ABAG should revise or recirculate the DEIR, or issue a technical addendum with adequate public review time.

Response O9-3

The Draft EIR adequately discloses the role of the 2014 Building Industry Association of the Bay Area (BIA) Settlement Agreement. The settlement agreement is publicly available and summarized in Table 1-1 of the Draft EIR. "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" describes the agreement's operative provisions and applicability. "Master Response 1: Regional Growth Forecast" describes the regional growth forecast methodology, including the Regional Housing Control Total (RHCT) and how it is distinct from the Regional Housing Need Determination (RHND) and Regional

Housing Need Allocation (RHNA). Together, these sections disclose the assumptions and framework used to prepare the proposed plan.

The settlement agreement establishes procedural and disclosure requirements governing the development, adoption, and monitoring of the RHCT and related assumptions. The agreement does not establish specific population or employment forecasts, does not determine RHNA requirements, and does not mandate particular transportation investments, housing allocations, or land use approvals.

As explained in Master Response 5, the Settlement Agreement influences the Regional Growth Forecast in one defined respect: it requires adoption of a Regional Housing Control Total (RHCT) that assumes no increase in in-commuting over the baseline year. Provisions related to consideration of in-commuting are consistent with Government Code section 65080, subdivision (b)(2)(B)(ii), which requires the SCS to identify areas sufficient to accommodate the region's projected population across all economic segments. The purpose of this requirement is to ensure that projected growth within the region is matched with housing opportunity within the nine-county Bay Area, rather than assuming continued growth in cross-regional commuting.

The regional growth forecast, including the in-commuter assumption, forms a basis for the environmental analysis in this EIR, as discussed in Master Response 1. CEQA requires disclosure and analysis of the proposed plan's adopted assumptions and resulting impacts associated with plan implementation. The Draft EIR analyzes the environmental effects of the proposed plan and its alternatives using the disclosed forecast and development pattern.

As described in Master Response 5, Plan Bay Area 2050+ constitutes a minor update and does not trigger additional stand-alone methodology adoption or RHCT approval requirements under the settlement agreement. The disclosures are consistent with the applicable provisions of the settlement agreement. The Plan Bay Area 2050+ Core Planning Assumptions, including the regional growth forecast, were presented to the MTC Planning Committee in November 2023 (see https://planbayarea.org/2050/2050-blueprint/plan-bay-area-2050-blueprint-documents for a list of all documents and meetings related to the development of the Plan Bay Area 2050+ Blueprint). The Core Planning Assumptions, including the regional growth forecast, were later approved as part of the Final Plan Bay Area 2050+ Blueprint in January 2025, and the Plan Bay Area 2050+ Final Blueprint was then moved forward for environmental review under CEQA in June, 2025.

The BIA settlement agreement's monitoring and procedural commitments are independent planning obligations and are not mitigation measures adopted to reduce environmental impacts under CEQA. Consistent with State CEQA Guidelines Section 15097, a Mitigation Monitoring and Reporting Program for the EIR will be prepared as part of the FEIR.

The comments do not identify new significant information requiring recirculation under State CEQA Guidelines Section 15088.5.

Comment O9-4

3. <u>The Plan's Mitigation Measures Are Inadequate (Table 4-34: Summary Comparison of EIR Impacts: Proposed Plan and Alternative Plans)</u>

A Program Environmental Impact Report is intended to analyze The Plan, the No Plan alternative, and two other feasible alternatives in order to make an informed choice. Table 4-34 on pages 4-77 through 4-83 displays the inadequacy of the plan's proposed mitigation measures.

Of the 67 findings and proposed mitigation, 35 of them (52%) are rated as "Significant and Unavoidable," even after mitigation. And the issues threaten safety and health. Consider three examples from Table 4-34.

- Climate change (GHG-1) = net increase in greenhouse gas emissions
- Hazards and Wildfire (HAZ-6) = impair implementation or physically interfere with . . . emergency evacuation plans.
- Public Utilities and Facilities (PUF-3) = inadequate water capacity to meet demand.

Table 4-34 identifies and rates The Plan, No Plan, and an alternative called "No New Highway Capacity," and another called "TOC Growth Focus Alternative." CEQA requires feasible alternatives as a key legal requirement. PBA2050+ fails to fulfill that requirement. When rated across Alternative Plans, the outcomes are negligible. Why? Because the choice of alternatives didn't rely on best practices of long-range planning or academic rigor.

Remedial Actions:

First, MTC staff, after updating PBA 2050+ with information acquired from a review of the Building Industry Association's RHCT and after adopting sound methodology to set reliable population projections, should identify two new scenarios that would be the basis of Alternative Plans, suitable for a 25-year vision. For example, one suitable alternative would plan for stable, steady, slow growth as forecasted by the California Department of Finance (DOF), instead of MTC's accelerated growth rate.

Second, MTC and ABAG should prepare a revised DEIR (FEIR) that addresses the explosion of artificial intelligence and cryptocurrency and explores how these two elements may impact housing, transportation, the environment, and the economy.

A final consideration that weaves these three issues together: Because the overwhelming negative environmental impacts persist, even after mitigation, the MTC and ABAG boards cannot approve Plan Bay Area 2050+ without first adopting a "statement of overriding considerations." What are MTC staff likely to declare as the "overriding considerations?" Yes, they'll say we have a "housing crisis"!

Here's the heart of the problem: The inflated MTC population forecasts and the Building Industry Association's authority to set regional housing control totals tilt PBA 2050+ towards collapse. The 25-year plan ignores the real issues of affordability, truth, and transparency at a time when planning and accountability are desperately needed.

In summary, we request that the MTC/ABAG Commissioners direct staff to provide corrected and supplemental information in the FEIR on the three issues. With that information in the FEIR, local jurisdictions and residents could fully understand environmental and policy impacts.

Thank you for addressing these points.

Response O9-4

Please refer to "Master Response 2: Mitigation Measures" for an explanation of the significant and unavoidable impact conclusions following identification of mitigation measures in the Draft EIR. Some impacts in the EIR are considered to be significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt mitigation measures included in the EIR, and thus cannot guarantee whether and how the mitigation measures will be implemented. It is ultimately the responsibility of a lead agency for future projects to determine and adopt mitigation measures. Others are identified as significant and unavoidable because the details of future projects that would be developed to implement the proposed plan are not known at this time, and therefore the effectiveness of mitigation to reduce impacts is currently unknown. Please refer to "Master Response 4: Program Level Document" for an explanation of the program level analysis prepared for the plan.

Please refer to "Master Response 1: Regional Growth Forecast" for an explanation of and methodology for population projections of the proposed plan.

Please refer to "Master Response 3: Plan Alternatives" for an explanation of the three alternatives chosen for analysis in the Draft EIR.

CEQA requires EIRs to evaluate alternatives to the proposed project that could feasibly attain most of the basic project objectives and that would avoid or substantially lessen any of the significant environmental impacts. In recognition of the nearly endless range of potential project variations, an agency is not required to analyze every conceivable alternative, but is instead governed by the rule of reason. An agency need only consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O10 Central Neighborhood Association of San Mateo

Laurie Watanuki
December 18, 2025

Laurie Watanuki
December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O10-1

Dear MTC and ABAG Boards,

The Central Neighborhood Association of San Mateo submits these comments on the Plan Bay Area 2050+ Draft Environmental Report (DEIR).

1. Growth Forecasts (DEIR Table 2-14)

   MTC's Bay Area population forecast with a growth rate of 24% is significantly higher than the growth rate published by the California Dept of Finance (DOF) at 6.5%. The DEIR does not clearly disclose the assumptions, data sources, or modeling method that disclose these discrepancies. We request that staff provide documentation of demographic methodologies, reconcile differences with DOF projections; and conduct analysis that reflect alternative growth scenarios. Please show the historic percentage growth rate over the last 25 years to provide historic context for the growth rate. The impact analysis must be adjusted to reflect an appropriate growth rate.

2. Grade Separations for Caltrain and High Speed Rail - Transportation (3-15-4)

   a. The DEIR states that High Speed Rail is planned to bring revenue operations during the timeframe of the proposed plan. Please provide additional information on the grade separations being proposed for Downtown San Mateo and other cities in the DEIR. We are concerned that the grade separations will bring more degradation to the Central and North Central Neighborhoods, which are located between the railroad tracks and the US 101 Freeway. Caltrans has limited the number of entrances to US 101 and we have too much vehicular traffic and trucks being funneled to the 101 South/4th Avenue entrance through 4th and 5th Avenues and Humboldt Street our residential streets. The DEIR should provide some analysis of these effects.

b. How many grade separations are you planning to build in Downtown San Mateo at the cost of $1 Billion each (price of Broadway Burlingame's Grade Separation)? Where are the funds coming from for these 6 grade separations in Downtown San Mateo? The project description is inadequate and should include this information on grade separations for Downtown San Mateo along with other cities for High Speed Rail.

c. The EIR should provide additional analysis of the significant adverse effects on surface streets from the proposed growth. Our goal is to have walkable and bikable neighborhoods with Vision Zero and reduce the cut-through traffic and truck impacts to and from US 101. In 1960, the US 101 Bayshore Highway had 2 lanes and today we have 12 lanes, in addition to the proposed 101/92 connector project which will add more lanes with no bridge expansion. Please identify and analyze better alternatives instead of grade separations, which generate more vehicular and truck cut-through traffic on neighborhood streets and add more traffic to 101. The EIR should identify mitigation that might include use of the state highways: El Camino Real to CA 92 to US 101 and tunneling for High Speed Rail through Downtown San Mateo.

d. The growth will increase air pollution in neighborhoods adjacent to highways and cause significant adverse effects on vegetation and public health. This DEIR encourages gentrification in low income areas and will once again cause people to relocate. We need additional mitigation measures such as higher sound walls and tall trees along the west side of the 101 from 4th Avenue to CA 92 to reduce the toxic air pollution, diesel particulates, and traffic noise. The 101 sound wall is only 9 feet in height at 9th Avenue in San Mateo. Truck exhaust pipes are 11-14 ft in height, which exceed the sound wall height. Residential neighborhoods next to 101 need more protection from greenhouse gases.

3. Alternatives to the Proposed Plan (Table 3.34: Summary Comparisons pf EIR Impacts)

a. The EIR identifies 67 impacts in the 14 categories of an EIR. Thirty-five of them (52%) are rated as "Significant and Unavoidable ". Many are cushioned in the language of "if feasible", in a move that reduces regional accountability by transferring responsibility from regional planners, developing this Program EIR to local jurisdictions who are responsible for project specific plans. The Plan does not address growth-induced local impacts, including emergency evacuations, solid-waste and utility capacity, other stresses on infrastructure, and aesthetic degradation of lower income residential neighborhoods and historic downtowns.

b. The DEIR itself indicated it needs huge new sources of revenue. Are the taxpayers paying for this with more ballot measures to increase taxes and "fees"? As far as we can tell, hundreds of billions will be required for transportation, housing, and protection against sea-level rise. Has this DEIR been subjected to financial review? Have the funding shortfalls been adequately disclosed?

4. Historic Resources (Pages 3.7.17 - 3.7.18)

The Yoshiko Yamanouchi House Historic District is located at 1007 East 5th Avenue, San Mateo, California. The Historic District is listed on the State and National Register of Historic Places and is also listed on the Asian American and Pacific Islanders Register. This property meets the description outlined in the EIR in the Bay Area 2025 Plan for Criterion A & B. The Yoshiko Yamanouchi House is located near the entrance of the 101 freeway between 4th and 5th Avenues, and South Humboldt Street in the Central Neighborhood in San Mateo. The Yoshiko Yamanouchi House will be significantly affected by the adverse environmental impacts of air pollution, diesel particulates, truck vibrations, and noise from Plan Bay Area 2050 +. The pollution and vibrations will significantly affect the historic resources, including fences, trees, and gardens. The impacts will have adverse effects on the health of the plants and deteriorate the wood and materials of the historic resources. There have been 6

Katsura bamboo thatched fences and 7 sliding raindoors impacted by truck vibrations, air pollution and diesel soot. These have been rebuilt. The materials for the Katsura Building, Walkway and Katsura Garden were brought from Japan and the workmanship provided by craftsmen from Japan. This structure represents 17th Century Japanese Imperial Architecture. The 16th Century Japanese style Hill and Pond garden on 5th Avenue has been impacted by heavy truck vibrations, diesel soot, tree branches hit, and the cemented boulders have fallen into the pond and repositioned back in place. Please identify mitigation measures to avoid or reduce these significant effects. The National Register of Historic Places Registration documentation for the Yoshiko Yamanouchi House was submitted to MTC/ABAG vi e-mail on 12/3/25 and a bound copy sent on 12/3/25.

5. Renter Protections - Chapter 2 - Project Description - Housing - (Strategy H1)

More tenant protections and limits on rent increases that exempt new construction do not belong in the Plan Bay Area 2050 + DEIR. This is a local decision for each city and creates more future problems for those who own rental properties. Please remove these references to more tenant protections in the Plan Bay Area 2050+.

Thank you for your consideration.

Response O10-1

Please refer to Responses O5-1 through O5-8.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter O11 Save Lafayette

Elizabeth Henry
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O11-1

Dear MTC and ABAG Board Members,

On behalf of Save Lafayette, a 501(c)(3) organization, representing approximately 4,000 citizens in Lafayette, CA, dedicated to the preservation of our community as IS in a democratic society, I want to submit first, that we support MOST of the comments that the City of Lafayette has previously submitted by our City Council.

We also wanted to make some specific points regarding the DEIR:

We have identified three, among many, issues that require clarification or correction to ensure the DEIR meets CEQA standards for accuracy and transparency.

Response O11-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O11-2

1. Growth Forecasts (DEIR Table 2-14)

MTC's population forecast with a growth rate of 24% is significantly higher than the growth rate published by the California Department of Finance (DOF) at 6.5%. The DEIR does not clearly disclose the assumptions, data sources, or modeling methods that explain these discrepancies. We request that staff provide documentation of demographic methodologies, reconcile differences with DOF projections; and conduct analyses that reflect alternative growth scenarios.

Response O11-2

As described in "Master Response 1: Regional Growth Forecast," the regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology designed for RTP/SCS planning and analysis purposes. While DOF projections are an important reference point, Plan Bay Area's growth forecast reflects a regional economic-demographic modeling approach rather than a status-quo demographic projection.

For Plan Bay Area 2050+, MTC and ABAG carried forward the adopted methodology from Plan Bay Area 2050, while updating forecast inputs to reflect significant post-COVID demographic and economic changes. The Draft EIR discloses the Plan Bay Area growth forecast and its use in the environmental analysis, including in Table 2-14.

Comment O11-3

1. Building Industry Association Settlement Agreement Components and Compliance Information. (Play Bay Area Introduction, (1.7.4 "2013 Settlement Agreement") and Table 1.1

While this section acknowledges that the settlement created "ongoing obligations" for MTC and ABAG, it offers no explanation of how the settlement influences housing assumptions. It also fails to explain how the litigation settlement may affect local infrastructure capacity, displacement, or affordability. The omission of details about the settlement leaves local governments unable to evaluate whether PBA's assumptions reflect a legal necessity or policy preference, or how it impacts the Regional Housing Need Allocation process.

Response O11-3

Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" regarding the BIA settlement agreement.

Comment O11-4

1. Alternatives to the Proposed Plan (Table 3.34: Summary Comparison of EIR Impacts)

The EIR identifies 67 impacts in the 14 categories of an EIR. Thirty-five of them (52%) are rated as "Significant and Unavoidable." Many are cushioned in the language of "if feasible," in a move that reduces regional accountability by transferring responsibility from regional planners, developing this Program EIR, to local jurisdictions, who are responsible for project-specific plans. This is the same "premise" that HCD and the state government have been operating under since the Housing Crisis Act was declared: ALL of the responsibility for providing "affordable" housing is being FORCED on the cities, with NO funding coming from ANY government agency or source. The developers have NO requirements being made of them to provide affordable housing; instead, they are being "de-regulated" from CEQA requirements, to make building cheaper for them to build, at the expense of many environmental concerns; but there is NOTHING in any of the policies or legislation that regulates affordability in what they build.

Response O11-4

Please refer to Response A16-4 and "Master Response 2: Mitigation Measures" regarding significant and unavoidable impacts in the Draft EIR, including discussion of the provisions of SB 375 that allow for streamlined environmental review of projects consistent with the proposed plan that incorporate

mitigation measures to the extent applicable and feasible. Comments related to the Housing Crisis Act and affordable housing do not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

Comment O11-5

1. Since there are no clear Plan Alternatives, hazards of the plan are likely to prevail, including findings like these: Climate–a net increase in greenhouse gas emissions; Hazards-- interfere with emergency evacuation plan; Housing–physically divide an established community; Public Utilities–inadequate water capacity to meet demand; and others.

In summary, we request that the MTC/ABAG Commissioners direct staff to provide corrected or supplemental information so local jurisdictions can fully understand environmental impacts and policy implications. Otherwise, it would seem the honest and prudent thing to do is to perhaps begin again, as this DEIR does not reflect true and honest findings, and the idea that 67 "unavoidable but significant" impacts is a very high number, and actually does not even consider other main impacts, such as schools. The idea that schools or open space or traffic or parking are "insignificant" because the people preparing these DEIRs do not consider them to be, is utter hubris on the part of the preparers, and a very very unfair and undemocratic way to approach this entire Draft EIR. It should NEVER be put forward to "fit" a narrative, or to cater to the wants of special interest groups. It should be honest, straightforward and FACTUAL, instead of being made into a political policy strategy, and FORCING cities and people to comply with it, when the people did not enter into the planning any of this PBA 2050 OR the DEIR.

Response O11-5

Alternatives to the proposed plan are discussed in Chapter 4 of the Draft EIR (pages 4-1 through 4-92). As summarized in Table 4-34 of the Draft EIR, The No New Highway Capacity and Transit Reinvestment Alternative would result in less impacts associated with GHG emissions and physically dividing an established community as compared to the proposed plan. Alternatives 2 and 3 would result in similar impacts related to interference with emergency evacuation plan as the proposed plan and Alternative 2 would result in similar impacts related to water supply as the proposed plan. Please refer to Section 4.5 of the Draft EIR (pages 4-17 through 4-73) for a detailed discussion of comparative impact analysis of alternatives.

Please refer to “Master Response 2: Mitigation Measures” regarding significant and unavoidable impacts. As discussed therein, MTC and ABAG cannot require local implementing agencies to adopt mitigation measures included in the EIR, and thus cannot guarantee whether and how the mitigation measures will be implemented. Cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities implement projects under the plan. Cities and counties are not forced to comply with the plan, which provides long-range guidance for the regional multimodal transportation system and a land use plan to accommodate future growth. As described on page 2-2 of the Draft EIR the proposed plan does not change local land use policies; individual jurisdictions retain all local land use authority. The proposed plan facilitates subsequent streamlined CEQA analysis pursuant to SB 375, SB 743, and other methods described in Section 1.9, “CEQA Streamlining Opportunities,” in Chapter 1, “Introduction” of the Draft EIR.

Impacts related to schools are considered under Impact PSR-1 of the Draft EIR (pages 3.13-11 through 3.13-15). As discussed in Impact PSR-1, the proposed plan's land use growth footprint to accommodate forecasted regional growth could result in significant and unavoidable impacts related to new or expanded public service facilities, including schools. Impacts related to open space are considered under Impact PSR-2 of the Draft EIR (pages 3.13-15 through 3.13-18). Impact PSR-2 concludes that implementation of the proposed plan’s forecasted development pattern, sea level rise adaptation projects, and transportation projects have the potential to directly increase demand on recreational services

associated with increases in regional growth. The construction of new or expanded recreational facilities itself would result in significant and unavoidable environmental impacts.

The topics related to traffic congestion and parking are not subject to analysis under CEQA because they are economic and social effects that by themselves do not constitute a physical effect on the environment (CEQA Guidelines Section 15382 ["[a]n economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."]). Section 3.15, "Transportation," of the Draft EIR evaluates the proposed plan's impacts related to conflict with a circulation system program, plan, ordinance, or policy; vehicle miles traveled; substantially increasing hazards due to geometric design features or incompatible uses; and inadequate emergency access. Please refer to Section 3.15 of the Draft EIR (pages 3.15-18 through 3.15-32) for a discussion of transportation related impacts.

CEQA requires an early and open process for determining the scope of issues that should be addressed in the EIR. MTC and ABAG initiated the scoping process of the Draft EIR on January 14, 2025, through issuance of the Notice of Preparation. As required by CEQA, MTC and ABAG sent a copy of the Notice of Preparation to the State Clearinghouse within the Governor's Office of Land Use and Climate Innovation and to the county clerks in each of the nine Bay Area counties. A virtual scoping meeting was held on Wednesday, January 29, 2025, from 1:00 p.m. to 2:30 p.m. At this meeting, a presentation by MTC staff provided an overview of the proposed plan, the CEQA process, and key environmental issues identified in the Notice of Preparation. Please refer to Section 1.3, "Notice of Preparation and Public Scoping," of the Draft EIR (pages 1-2 and 1-3) for a discussion of the Draft EIR scoping process.

Comment O11-6

Thank you for your consideration in this matter. I do hope you will respond to the many people (and cities) who are submitting comments on this PBA 2050. We are the ones being most affected by all of this, and WE are the ones who are being least considered in any of this - what the people want, what the people need, our rights and our freedoms seem to be under attack, so to continue forward in this manner is simply not acceptable, and unconstitutional.

Response O11-6

The commenter's concerns are noted. Comments received during the public review process will be considered and responded to in the Final EIR, consistent with CEQA. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding ongoing coordination.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O12 Citizens Committee to Complete the Refuge

Carin High, Co-Chair; Gail Raabe, Co-Chair; and Arthur Feinstein, Board Member
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O12-1

Re: Notice of Preparation for a Draft Environmental Report for Plan Bay Area 2050+ *(Regional Transportation Plan/Sustainable Communities Strategy for the Nine-County San Francisco Bay Area)*

Dear MTC/ABAG Staff, The Citizens Committee to Complete the Refuge appreciates the opportunity to provide comments for the Draft Environmental Impact Report (DEIR) for Plan Bay Area 2050+ (PBA 2050+). According to the Notice of Availability (NOA), Plan Bay Area 2050+ will "serve as the 2025 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the nine-county region." The Notice of Availability (NOA), states the PBA 2050+ DEIR:

"....programmatically assesses and discloses the potential environmental impacts of implementing the proposed Plan, including housing and economic strategies to accommodate forecasted regional growth; transportation strategies to invest expected forecasted transportation revenues; and environmental strategies to protect the region from future sea level rise inundation. The Draft DEIR also recommends measures to mitigate any significant adverse impacts and analyzes a reasonable range of alternatives to the proposed Plan."

We applaud the incorporation of updates to the Environmental Element Section, such as increasing the projected sea level rise estimate from 3' to 4.9' by 2050, but remain concerned that the measures proposed are inadequate to address the challenges and threats posed by sea level and groundwater rise for our shoreline communities and for the ecological health of the Bay. Our DEIR comments are based upon the information contained in the Final Blueprint, the DEIR and appendices.

The Citizens Committee to Complete the Refuge (CCCR) has a long-standing interest in the protection, restoration, and acquisition of San Francisco Bay wetlands; as such the focus of our comments is on biological resources and in particular on the interface of Plan Bay Area 2050+, with the sea level rise adaptation guidance provided in the San Francisco Bay Conservation and Development Commission's (BCDC) Regional Shoreline Adaptation Plan (RSAP), with the shoreline and habitats of San Francisco Bay.

CCCR was originally formed in 1965 by a group of citizens who became alarmed at the degradation of the Bay and its wetlands. We joined together, and with the support of Congressman Don Edwards, requested that Congress establish a wildlife refuge. The process took seven long years and in 1972 legislation was passed to form the San Francisco Bay National Wildlife Refuge, the first national wildlife refuge in an urban area. In 1988, Congress authorized expansion of the refuge boundary to potentially double the original size. Our membership is approximately 1,500 people and we have the support of local and national organizations-- including open space advocates, environmental groups and hunters.

Our organization has taken an active interest in the protection of the baylands of San Francisco Bay, the health and biodiversity of San Francisco Bay ecosystems, protection of wetlands and endangered species and the habitats that support them, the watersheds that support Bay ecosystems and public education regarding the value of these resources.

CCCR has been an active stakeholder in previous iterations of Plan Bay Area, the Priority Conservation Area Program (PCA), and the San Francisco Bay Conservation and Development's (BCDC) Adapting to Rising Tides and Bay Adapt processes, and served on the Advisory Group of BCDC's development of Guidelines for the Regional Shoreline Adaptation Plan (RSAP) program.

Pertinent to the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) statement that this is a plan that "identifies a suite of integrated strategies that will enable the Bay area to accommodate future growth and make the region more equitable and resilient in the face of unexpected challenges," the critical role the region's baylands play in providing climate resilience and providing strategies that can benefit our communities and economy, must be recognized and must be incorporated into Plan Bay Area 2050+. Our comments center on the impacts to biological resources or climate change resilience, with a focus on the Bay shoreline.

Response O12-1

These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O12-2

1. Incorporation of BCDC's Regional Shoreline Adaptation Plan (RSAP) Guidelines Into the Identification and Analysis of Impacts, Avoidance and Minimization of Impacts and Mitigation Measures

The DEIR does acknowledge and very briefly explains the history and focus of BCDC's RSAP Guidelines, but is inconsistent in describing the goals of the RSAP guidance. As an example, under the Biological Resources section (Section 3.5) and the description of "Regional and Local Regulations," BCDC's RSAP is described as follows:

> "In 2023, Governor Newsom signed SB 272: Sea Level Rise Adaptation and Planning, which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with the targeted assistance of the State. The Regional Shoreline Adaptation Plan is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. This includes BCDC's guidelines for how local governments must meet the requirements of SB 272, including preparation of a Subregional Shoreline Adaptation Plan (Subregional Plan) by 2034."

This statement is true, but incomplete. Under Section 3.10 Hydrology and Water Quality, in the description of Senate Bill 272 and the description of the purpose of these plans the DEIR states:

> "These plans are intended to be used by cities and counties to protect their residents, neighborhoods, communities, infrastructure, and habitats from sea level rise on the bay shoreline and on the outer coast." [emphasis added]

Under Section 3.11 Land Use, Population and Housing, the DEIR states:

> "The RSAP guidelines emphasize the importance of incorporating nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. Local jurisdictions within BCDC's jurisdiction must consider RSAP guidance when developing or updating their general plans, Local Coastal Programs (LCPs), and zoning codes to ensure consistency with regional adaptation priorities (BCDC 2024)." [emphasis added]

The underlined wording from these passages are important and should be consistently stated in PBA 2050+ documents. Just as PBA 2050+ provides a regional vision for development, transportation infrastructure, and housing, the RSAP provides a vision of how the region will adapt to sea level rise that includes protection of baylands habitats, as well as communities, from the threat of sea level rise. The RSAP also includes prioritization of the use of natural and nature-based solutions where possible, to provide resilience for the natural and built environment. The RSAP Guidelines provide the overarching regional and subregional framework for shoreline communities that includes consideration of the impacts of shoreline growth on the region's ability to provide sea level rise and groundwater rise resilience for the natural and built environment. The RSAP Guidelines require a holistic description of the built and natural shoreline environment, threats posed, and assessment of, and identification of resilience strategies. The RSAP Guidelines establish minimum standards that must be considered in adaptation planning. The required holistic review of climate resilience crosses a variety of land use and CEQA "Environmental Issue

Areas" (e.g. biological, cultural, hazards, hydrology and water quality, etc.); therefore, we urge the following:

a. The description of Senate Bill 272 and the RSAP Guidelines provided in the DEIR, should consistently state that the RSAP sets the regional and subregional framework within which shoreline communities should develop strategies that provide resilience for the built and natural environment. The RSAP Guidelines provide an overarching framework for shoreline communities that includes consideration of the impacts of shoreline growth on the ability to provide sea level rise and groundwater rise resilience for the natural and built environment.

Response O12-2

The description of the Regional Shoreline Adaptation Plan on pages 3.5-33 and 3.5-44 of the Draft EIR has been revised with the additional text to clarify the specific steps for a Subregional Shoreline Adaptation Plan. See Chapter 3 of the Final EIR, which provides the revised text. These revisions reflect minor clarifications, and changes to the analysis or conclusions in the Final EIR are not warranted.

As described in State CEQA Guidelines Section 15131, the focus of an EIR's analysis should be the physical changes caused by a project. Comments related to the explanation of BCDC's RSAP Guidelines and Senate Bill 272 do not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The Plan Bay Area 2050+ is a long-range regional plan includes strategies related to sea level rise adaptation and regional resilience planning. The proposed plan includes a list of locally developed sea level rise adaptation projects, as well as placeholder projects, collectively referred to as the Resilience Project List. The Resilience Project List will continue to support regional development of RSAP plans and utilizes the regional Shoreline Adaptation Project Map. MTC and ABAG will continue to provide complementary sea level rise technical assistance that aligns with BCDC's RSAP efforts. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-3

b. The DEIR is consistent in its description of the RSAP and more fully summarizes the elements to be considered in the development of an SSAP/RSAP Plan which include resilience for baylands habitats and prioritization of the use of natural and nature-based solutions where feasible, as these required elements will have a bearing on local government decisions regarding growth and adaptation strategies.

Response O12-3

The comment regarding the Draft EIR's consistency with the Regional Shoreline Adaptation Plan is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-4

c. The DEIR should describe how the PBA 2050+ will ensure consistency with BCDC's RSAP Guidelines and regional vision for sea level rise resilience for the natural and built environments.

Response O12-4

As applicable, local governments must meet the requirements of SB 272, including preparation of a Subregional Shoreline Adaptation Plan (Subregional Plan), by 2034. PBA 2050+ is not the mechanism for consistency with BCDC's RSAP Guidelines; rather, SB 272 is that mechanism. SB 272 is already included in the regulatory setting on page 3.5-33 the Draft EIR.

Comment O12-5

d. The DEIR should provide the link for the "Regional Shoreline Adaptation Plan Atlas Open Data" webpage - https://rsap-open-data-bcdc.hub.arcgis.com/

Response O12-5

Page 3.6-33 of the Draft EIR has been revised to include a link to the Regional Adaptation Plan Atlas Open Data webpage. The revised text is shown in Chapter 3 of the Final EIR. The revision provides additional information context and does not change the analysis or conclusions in the Draft EIR.

Comment O12-6

e. The DEIR should provide the link to the San Francisco Estuary Institute Baylands Resilience Framework webpage at: https://www.sfei.org/projects/baylands-resilience-framework This webpage provides useful information regarding types of nature-based solutions that can be considered. SFEI's Resilience Metrics Mapbook dives a bit deeper and provides insights at the Operational Landscape Unit (OLU) level of the types of nature-based solutions that might be possible within each OLU and the types of community and ecosystem resilience that could be achieved. https://www.sfei.org/documents/san-francisco-baylands-resilience-metrics-mapbook and a link for this site should also be included.

Response O12-6

Page 3.6-35 of the Draft EIR has been revised to include a discussion about the San Francisco Estuary Institute Baylands Resilience Framework, which also contains a description of the San Francisco Baylands Resilience Metrics Mapbook and provides links to the webpages. The revised text is shown in Chapter 3 of the Final EIR. The discussion clarifies that the San Francisco Estuary Institute Baylands Resilience Framework is an informational tool to support adaptation planning and does not establish regulatory requirements. This revision provides additional context regarding regional climate adaptation planning sources and does not change the analysis or conclusions in the Draft EIR.

Comment O12-7

2. Growth Geographies Mapping

We commented during the NOP process that the level of resolution available in the pdf versions of the Growth Geography mapping is insufficient. It remains insufficient and we urge that prior to the release of the FEIR, MTC/ABAG provide the following:

a. The DEIR should provide a hyperlink for the Growth Geography mapping similar to that provided by the online Plan Bay Area 2050 Growth Geographies webpage, to enable decision-makers and the public to better understand the exact locations of proposed Priority Development Areas, Primary Production Areas, Transit-Rich Areas, Transit-Rich and High-Resource Areas, etc.: https://opendata.mtc.ca.gov/datasets/MTC::plan-bay-area-2050-growth-geographies/explore?location=37.498436%2C-122.201465%2C13.54

b. The DEIR should provide information regarding the status of the Growth Geography areas identified, (e.g. in planning phase, partially developed, fully developed). This is crucial information for the identification and analysis of impacts to CEQA's "Environmental Issue Areas." As an example, based upon the resolution provided on Attachment C Draft Blueprint Growth Geographies, version 5, it would appear some of the areas identified within the cities of Newark and Fremont may have been at least partially, if not fully developed.

As an example of the need for a higher resolution Growth Geographies mapping, the broadbrush map in Figure 2-5: Growth Geography Designations by Type (Page 2-24) (below) is inadequate even at the

programmatic level. The map includes Redwood City-designated Open Space Lands, Port-related heavy industries important to the regional economy and the Port "buffer" area across Seaport Boulevard that are all vulnerable to 12" of sea level rise.

Response O12-7

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," Plan Bay Area 2050+ is a regional-scale policy and planning framework, and the Draft EIR provides a program-level environmental analysis of the potential environmental impacts of plan implementation, as discussed further in "Master Response 4: Program Level Document." The Growth Geographies figures included in the Draft EIR are intended to provide a high-level depiction of regional patterns and do not provide parcel-level mapping.

Consistent with prior Plan Bay Area efforts, detailed geography boundaries used in plan development have been made publicly available through MTC's open data resources, allowing the public to explore geography boundaries in greater detail than is feasible in printed figures. The commenter's request for a hyperlink to an online Growth Geographies mapping resource is noted and will be considered for inclusion in supporting plan documentation.

With respect to the commenter's request for additional information on the development status of areas identified as Growth Geographies, the growth geographies are meant to demonstrate areas to focus the region's forecasted household and job growth, based on the housing and economy strategies in the proposed plan. It will not override local land use decisions in terms of the planning and development of those areas. Consistent with CEQA, the Draft EIR discloses potential program-level environmental impacts associated with implementation of the proposed plan's growth pattern and strategies. Please refer to Response O12-11 and "Master Response 4: Program Level Document," for additional discussion.

Comment O12-8

DRAFT ENVIRONMENTAL IMPACT REPORT OCTOBER 2025 Figure 2-5: Growth Geography Designations by Type showing "Transit Rich Area" (in orange in the figure on the left), and an excerpt from the Redwood City General Plan, General Plan Land Use, Effective on August 24, 2023, with an overlay of the DEIR designated "Transit Rich Area" outlined in yellow (in figure on the right).

If this "growth designation" is retained in the FEIR, there must be discussion/analysis of development impacts to the Port, valuable existing shorebird roosting habitat on the Redwood City Cargill Salt Ponds and the loss of critically important nature-based SLR adaptation opportunities, including tidal marsh migration, marsh restoration and horizontal levees for flood protection.

Recently enacted legislation, SB 79: Wiener, includes specific language excluding a new housing mandate in SLR vulnerable areas. An amendment to the bill also removed areas near ferry terminals from the

legislation's sites requiring Transit-oriented Development. The State recognizes that areas vulnerable to sea level rise may be inappropriate for new housing, and yet Plan Bay Area is advocating for housing development near ferry terminals in these same areas.

The low resolution of this figure makes it nearly impossible to detect that changes have occurred. The area of concern is the designation of a location across Redwood Creek from the Bair Island Unit of Refuge as a "Transit Rich Area." What are the implications for such designations? If for example, Transit Oriented Development would be a foreseeable outcome of a TRA, this would be extremely concerning. Habitats such as the listed species the Ridgway's Rail, might be impacted by development at that site. Also, the general area indicated on Growth Geography Designations by Type is in an area that is vulnerable to inundation as sea levels rise thus making development and transit in this area questionable.

Response O12-8

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," Growth Geography designations shown in the Draft EIR are planning and analytical tools used to evaluate potential growth patterns at a regional scale and do not approve specific projects, change local land use authority, or mandate transit-oriented development in any specific location. Land use decisions remain under the authority of local jurisdictions and are subject to applicable state and local requirements related to hazards and environmental protection.

Please refer to Response O12-11 for additional discussion regarding how Growth Geography criteria, exclusions (including sea level rise exclusions), and program-level environmental analysis are addressed in the Draft EIR.

Since no specific project is being considered for approval with the proposed plan, analysis of biological impacts to this specific area would be premature and speculative. Nonetheless, the Draft EIR analyzes biological impacts at the plan level and proposes mitigation measures that would, if implemented, mitigate impacts to shorebirds or habitat. See Chapter 3.5 of the Draft EIR, regarding biological resource impacts. Please also refer to "Master Response 4: Program Level Document."

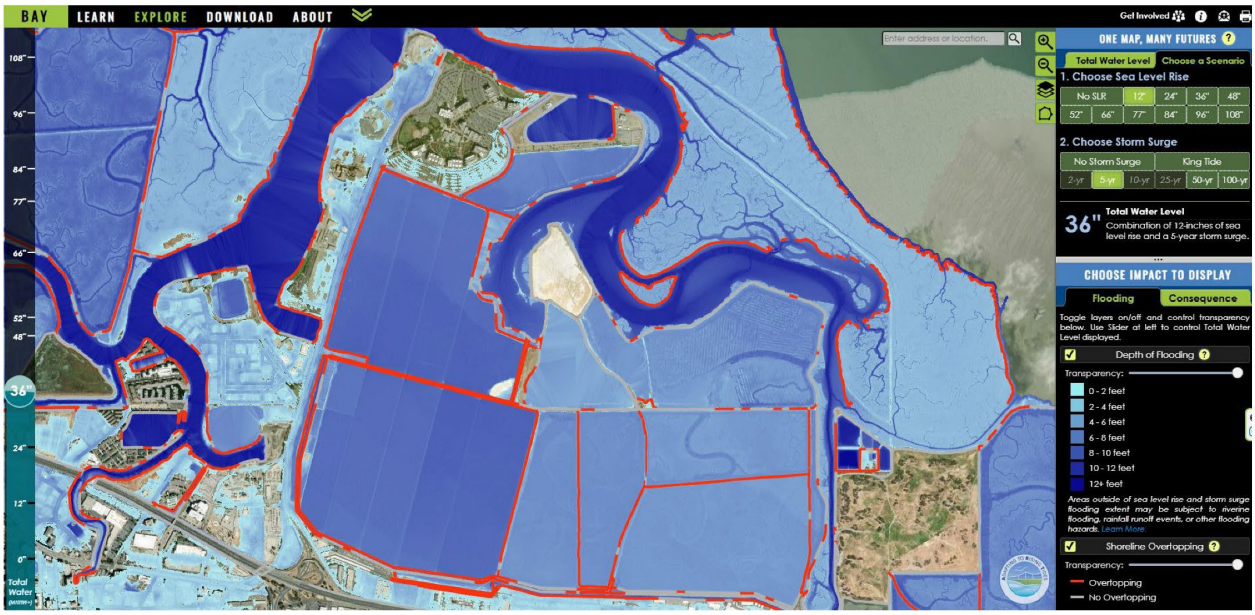
Comment O12-9

Strategy H3: Allow a Greater Mix of Housing Densities and Types in Growth Geographies states:

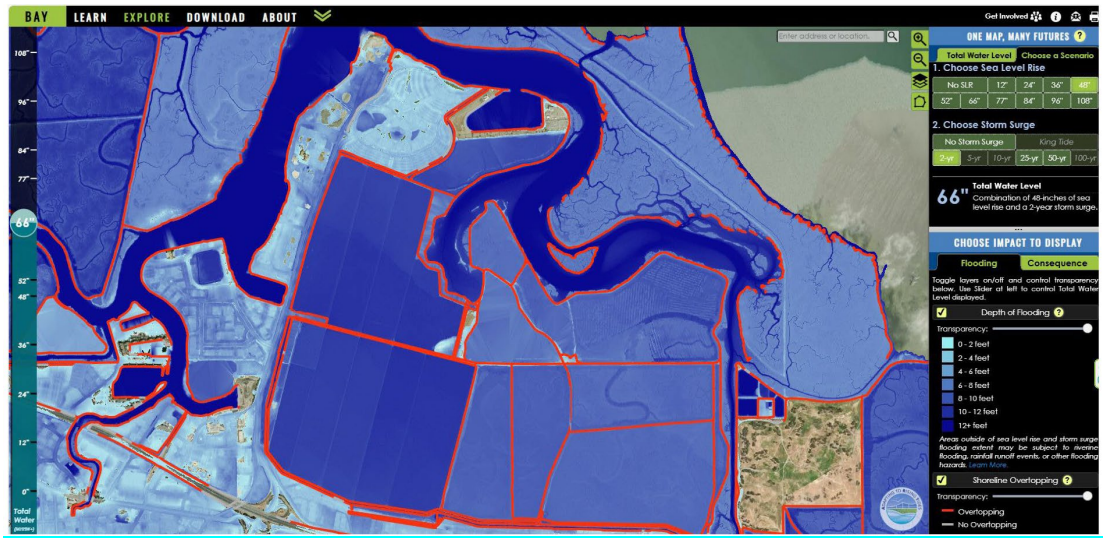
> "Allow a mix of housing types at a range of densities and in a variety of building configurations to be built in Priority Development Areas, select High-Resource Areas, and select Transit-Rich Areas, including areas where the Transit-Oriented Communities Policy applies, augmented by streamlined review and reduced parking requirements for affordable homes, as well as building code updates." [emphasis added]

What determines whether a "Transit Rich Area" is a "select Transit-Rich Area"? Given the sea level rise concerns, the potential for significant impacts to biological resources, and the potential significant growth inducing impact, this "Transit Rich Area" should not qualify for "streamlined review;" there are too many significant impact issues that require thorough review and opportunities for public comment.

The following figures that have been downloaded from BCDC's Adapting to Rising Tides Flood Explorer Map demonstrate how vulnerable this area is to sea level rise inundation. Please note the inundation that can occur with just 12 inches of sea level rise plus a 5-year storm surge, the total water level for this area would be 36 inches.



And this is the area with four feet of sea level rise and a two-year storm surge, and a total water level of 66 inches.



OneShoreline Bayside mapping of future conditions – note the entirety of the area proposed as a "Transit-Rich Area" lies within a FEMA Special Flood Hazard Area or a Shallow Groundwater Rise Overlay District.

Response O12-9

As described in the proposed plan and "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+," Growth Geography designations and related strategies are intended to guide long-range regional planning and analysis and do not approve specific development projects or override local land use authority. Criteria for implementation of Strategy H3, including how implementation measures may be applied through TOC policy implementation and other program guidelines, would be determined through subsequent actions and program updates.

Regarding the distinction between "Transit Rich Area" and "select Transit-Rich Area", there is no real difference between the two phrases in the context of Plan Bay Area 2050+ Growth Geographies. The word "select" in Strategy H3 is meant to emphasize that the strategy does not apply to all areas meeting transit service criteria for this designation, but instead incorporates other constraints such as a jurisdiction's PDA nomination status and environmental hazards. In other words, "select Transit-Rich Area" reflects the intention of the proposed plan to be conservative in defining the growth framework and applying the strategy.

Please refer to Response O12-11 for additional discussion regarding Growth Geography criteria, exclusions (including sea level rise-related exclusions), and the program-level nature of the Draft EIR analysis.

Comment O12-10

In addition to vulnerability to sea level rise, the location is adjacent to the Port of Redwood City. The Port of Redwood City Commissioners stated[1] in 2020, that "incompatible residential developments were not appropriate" and that "the Port would not support incompatible land uses." Lastly, the area is directly across from the Don Edwards San Francisco Bay National Wildlife tidal marsh habitat of Greco Island and near the Refuge's Bair Island, both of which support the endangered Ridgway's Rail and numerous other rare species as well as harbor seal haul-outs.

While it is possible ferry service and/or a ferry terminal may ultimately be approved in this area, despite its vulnerability to sea level rise, PBA 2050+, should not promote or encourage housing or development to be associated with potential ferry service at this location. Promoting TOD in the immediate area of the ferry terminal would be extremely growth–inducing and would increase pressure for sprawl onto nearby City-designated Open Space lands at the Cargill salt ponds. In response to inquiries from CCCR members in 2021, we were told it was "too late to remove the location from the maps." This area appeared in the Plan Bay Area 2050 Growth Geographies mapping, disappeared from the Plan Bay Area 2050+ Draft Blueprint mapping, and evidently was put back onto the Final Blueprint map.

1 Board of Port Commissioners. Port of Redwood City Minutes, December 9, 2020. 521530_05329d944ee446b7badf700036e9f4e6.pdf (filesusr.com)

Response O12-10

The commenter raises concerns regarding sea level rise vulnerability, shoreline land use compatibility (including proximity to port-related industrial uses), sensitive biological resources, and potential growth-inducing effects associated with ferry service and/or transit-supportive development in the referenced area. These comments are noted and will be considered by the MTC Commission and ABAG Executive Board in their overall consideration of the proposed plan and Draft EIR.

As noted in responses to similar comments and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," Growth Geography designations used in the proposed plan are

planning and analytical tools for regional evaluation and do not approve specific projects, identify specific land uses, or override local land use authority. Any future ferry terminal proposal or development project would be subject to separate planning, permitting, and applicable environmental review processes conducted by responsible agencies. Please also refer to "Master Response 4: Plan Level Document."

Please refer to Response O12-11 for additional discussion regarding Growth Geography criteria, exclusions (including sea level rise-related exclusions), and the program-level nature of the Draft EIR analysis.

Comment O12-11

Furthermore, the DEIR must discuss how it identifies "select" Transit-Rich Areas and addresses the potential environmental impacts of identifying TRAs and TPAs. Clearly, a site that seems appropriate for a TRA might also result in unavoidable impacts to significant environmentally rich habitats. The DEIR must recognize that not all sites that may qualify as TRA or TPA are appropriate for that designation due to overarching environmental impacts. The PBA 2050+ should provide guidelines that enable decision-makers to consider these factors.

Under "Exceptions and Exclusions [to Growth Geographies] the DEIR states:

> "Areas of sea level rise inundation (i.e., areas at risk from sea level rise through year 2050 that lack adaptation strategies in the proposed plan's Environment Element) are excluded from Growth Geographies."

The above example seems contradictory to this exclusion. The maps need to be more clearly defined and this exclusion made clear and consistent throughout the DEIR.

Response O12-11

The proposed plan's growth geographies (including TRAs and TPAs) are planning and analytical tools used to support regional forecasting and program-level evaluation of growth patterns. These designations do not approve site-specific development projects, do not override local land use authority, and do not determine the appropriateness of specific development proposals in individual locations. Land use decisions remain under local jurisdiction authority and are subject to applicable environmental, hazard, and resource protection requirements.

The Draft EIR evaluates the proposed plan at a programmatic level and does not include site-specific determinations of environmental suitability for individual mapped locations. Consistent with CEQA, the Draft EIR discloses potential program-level environmental impacts associated with the proposed plan's growth pattern and strategies, including effects related to biological resources and hazards. Implementation of plan strategies, including application of incentives or policies to specific locations, would occur through subsequent actions and would be subject to additional planning and environmental review as appropriate. Please refer to "Master Response 4: Program Level Document" for a discussion of program level analysis.

Comment O12-12

3. The Updated Priority Conservation Area Program Must Be Incorporated Into PBA 2050+

The "*Priority Conservation Area Refresh Final Report, Proposed Reforms for the PCA Planning Framework*," dated May 2024 states:

> "With a refreshed PCA Framework, staff anticipate linking PCAs with PBA 2050+ environmental strategies aimed at preserving natural and working lands, ensuring greater access to recreation and nature within cities, and adapting to climate change."

Response O12-12

The commenter provides a recommendation regarding incorporation of the updated Priority Conservation Area (PCA) planning framework into Plan Bay Area 2050+ and related environmental strategies. The proposed plan's Environment Element includes strategies focused on preserving natural and working lands, improving access to open space, and advancing climate resilience. Furthermore, Priority Conservation Areas are discussed as part of the environmental setting for the purpose of analyzing program-level biological impacts and agriculture and forestry resource impacts, as included on pages 3.3-6 and 3.5-22 of the Draft EIR.

Comment O12-13

a. Why does the DEIR state on 3.3-6:

> "PCAs are open spaces that provide agricultural, natural resource, scenic, recreational, and/or ecological values and ecosystem functions. These areas are identified through consensus by local jurisdictions and park/open space districts as lands in need of protection because of pressure from urban development or other factors. PCAs are categorized into four designations: Natural Landscapes, Agricultural Lands, Urban Greening and Regional Recreation. There are 184 PCAs within the region." [emphasis added] What happened to the "Climate Adaptation" designation that still appears on the ABAG PCA webpage? https://abag.ca.gov/PCA

b. The DEIR should include a hyperlink for the Priority Conservation Area Mapping Viewer to provide decision-makers and the public access to a high-resolution online map that displays the PCA Eligibility Areas for each of the five categories of PCAs: https://experience.arcgis.com/experience/3fa00ead34c84a43bfa935164dadbd2e/page/Page/

Response O12-13

Page 3.3-6 of the Draft EIR has been revised to provide a correction to outdated information that was presented in the Draft EIR regarding the categories of Priority Conservation Areas and a link to where Priority Conservation Areas can be viewed on a map. The revision provides additional information context and does not change the analysis or conclusions in the Draft EIR.

Comment O12-14

c. The DEIR must identify the direct, indirect, and cumulative impacts of the overlay of Growth Geographies and PCA Eligibility Areas on pertinent CEQA "Environmental Issue Areas," and include measures that could avoid or minimize those impacts.

Response O12-14

The Draft EIR evaluates the proposed plan at a programmatic level and analyzes direct, indirect, and cumulative environmental impacts across the CEQA issue areas based on the plan's regional growth pattern, strategies, and associated transportation and environmental actions. Growth Geographies and conservation-related planning designations (including PCA Eligibility Areas) are used as inputs to regional planning and analysis and do not by themselves approve site-specific development or conservation projects. As a program-level document, the Draft EIR does not provide parcel-level impact analysis for every location where mapped planning geographies may overlap; instead, it evaluates regional-scale effects and discloses programmatic mitigation measures and implementation strategies, where feasible. Please refer to "Master Response 4: Program Level Document" for a discussion of program level analysis.

Comment O12-15

d. So much of the discussion within the DEIR revolves around sea level rise, but there is no mapping provided of potential areas for the "Climate Adaptation" category which could apply to both shoreline

areas vulnerable to sea level rise as well as "Wildland Urban Interface" areas that could be vulnerable to wildfire. The DEIR should include mapping for each of the PCA Eligibility Areas, but especially the PCA Eligibility Areas for Climate Adaptation. These maps should be high-resolution maps, as mentioned above. The DEIR should identify locations where each of the Growth Geographies overlap PCA Eligibility Areas.

Response O12-15

PCAs are nominated by local governments. Although PCAs are not part of the Growth Geography framework, they are a set of geographic areas that can be used to target where planning, policy, and implementation activities are needed, and are thus complementary to the growth framework. This comment requests inclusion of PCA mapping in the Draft EIR but does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. To the extent that this program-level EIR should describe PCAs as part the environmental setting for analyzing program level impacts, PCAs are discussed as part of the environmental setting for the purpose of analyzing program-level biological impacts and agriculture and forestry resource impacts, as discussed on pages 3.3-6 and 3.5-22 of the Draft EIR. For more on the requisite level of environmental analysis in a program-level EIR, please refer to "Master Response 4: Program Level Document."

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-16

4. Sea Level Rise "Adaptation" is not defined in the DEIR which could lead to missed resilience opportunities for communities and for the ecological health of San Francisco Bay, and in particular an underestimate of the impacts to tidal wetlands habitat. The DEIR should provide a clear and consistent description of what is meant by sea level rise adaptation, and natural and nature-based solutions. The DEIR should acknowledge the RSAP prioritization of the use of natural and nature-based solutions for sea level rise adaptation where feasible. The DEIR regularly references sea level rise adaptation strategies as:

"The plan's sea level rise adaptation projects build on local and regional planning efforts, incorporating a range of actions to mitigate inundation and storm surge impacts. These actions include elevating roadways and rail infrastructure to maintain connectivity while allowing for ecosystem linkages beneath, constructing levees—both traditional and horizontal—to provide flood protection and support wetland migration, and implementing seawalls in highly developed areas to limit erosion and flooding. Tidal gates regulate tidal flows and storm surges in critical waterways, while marsh restoration efforts enhance natural flood resilience and restore wetland habitat. Together the area to support these projects makes up the sea level rise adaptation projects footprint."

The DEIR refers to an October 2025, "*Draft Technical Assumptions*" document that states:

> "Ecosystem benefits were not singled out as a potential impact, as a majority of projects are anticipated to benefit local ecosystems: 27% of the projects in the Sea Level Rise Resilience Project List are entirely nature-based, and 41% are estimated to be hybrid, with both nature-based and grey infrastructure elements. Placeholder projects were also assumed to be nature-based wherever suitable."

It is encouraging to learn that 27% of sea level rise resilience projects are utilizing natured-based solutions (NBS) and that 41% are estimated to be hybrid projects. This still doesn't provide any understanding of the magnitude of impacts that implementation of these projects could have or is having on biological resources. The DEIR states that 84,100 acres of sea level rise adaptation projects have been proposed/are being implemented? How many of the 84,100 acres are NBS projects, versus hybrid, versus grey

infrastructure? Where is this information available? On the EcoAtlas website or…? The breakdown of acreages of NBS/green, versus hybrid (what type of grey infrastructure is included in the hybrid designation), versus grey infrastructure, should be provided. Attachment G to the Final Blueprint describes the county and the types of adaptation actions, but the public has no estimate of acreages of impacts or where specifically they are located, so it is difficult to assess the significance of the impact and whether or not the proposed biological mitigation measures are adequate.

Response O12-16

The proposed plan includes sea level rise adaptation strategies intended to address inundation and storm surge risks and identifies a range of potential adaptation actions, including elevation of transportation infrastructure, levees (including horizontal levees), seawalls, tidal gates, and marsh restoration. As described in the Plan Bay Area 2050 Final EIR, these adaptation concepts are identified at a planning level. Specific resilience projects would be advanced by responsible operators or owners through subsequent planning, design, permitting, funding, and project-level environmental review, as applicable.

Consistent with the programmatic nature of the Draft EIR, the analysis does not include design-level information for individual sea level rise adaptation projects, including final determinations of project footprint, engineering approach, or site-specific biological effects. Because detailed project descriptions and precise designs are not available at this stage, the Draft EIR does not provide a parcel-level accounting of the acreage associated with nature-based, hybrid, or gray infrastructure approaches across the full adaptation footprint. Such details would be developed through subsequent project-level planning and environmental review conducted by the responsible implementing agencies. For more on the requisite level on environmental analysis in a program-level EIR, please refer to "Master Response 4: Program Level Document."

The Draft EIR does incorporate available information regarding anticipated adaptation approaches, including assumptions that a portion of projects would include nature-based or hybrid solutions where suitable, as described in the Draft Technical Assumptions referenced by the commenter. The commenter's request for clearer definitions of sea level rise adaptation strategies, additional transparency regarding the composition of adaptation approaches, and further discussion of potential biological resource considerations is noted. Plan strategies and implementation priorities may be revised over time based on funding availability, performance outcomes, and agency decisions..

Comment O12-17

5. <u>Biological Resources Section</u>

a. Mapping and Tables:

i. Providing maps that depict the intersection of TRAs, TODs, PDAs, PPAs, PTAs, etc. with sensitive habitats, species, connectivity corridors, etc., provides a more complete picture of the potential impacts that might arise through implementation of PBA 2050+, provides insight into the cumulative impacts of PBA 2050+ on critical and sensitive habitats of the Bay Area, and will enable agencies and the public to provide more substantive comments. The DEIR provides tables and figures (which are at a resolution so low you cannot really zoom in), but without having the ability to understand where the footprint of a Growth Geography is in relation to critical habitats, sensitive habitats, species, connectivity corridors, sea level rise adaptation projects, it is difficult to ascertain even at a programmatic level if the proposed biological mitigation and monitoring measures are sufficient to reduce environmental harm.

We recognize that for some of these areas of overlap, there may be state or federal regulatory programs that will provide a more detailed and thorough review of impacts; however, there are

other areas where the only regulatory authority is provided by local governments. While MTC/ABAG have no regulatory authority over land use issues, the ability to provide guidance through the requirements of the PBA 2050+ DEIR could be helpful in reducing potential adverse impacts.

Response O12-17

The Growth Geography criteria broadly identify areas where development would be prioritized, but does not identify specific development footprints, and therefore, describing where these areas overlap sensitive habitats or documented species occurrences would be speculative, such that it would not accurately represent potential impacts on these resources. Instead, the Draft EIR relies on a program-level analysis of potential future projects in Growth Geography areas. Please refer to Section 2, "Project Description," of the Draft EIR that includes a description of the land use growth footprint, sea level rise adaptation project footprint, and transportation project footprint that were analyzed in the Draft EIR. Together these three growth footprints comprise the physical impact footprint analyzed in the Draft EIR. Please also refer to "Master Response 4: Program Level Document."

Mapping of biological resources within the proposed plan has been provided at a high level to depict the entire Bay Area. As noted by the commenter the Draft EIR is a program level document that presents a programmatic assessment of the potential impacts of the proposed plan, focusing on the entire set of projects, programs, and strategies contained in the proposed plan. Mitigation Measure BIO-1(a) requires implementing agencies to require project sponsors to prepare biological resource assessments for specific projects proposed in areas known or likely to contain habitat suitable for special-status plants and wildlife. Where the biological resource assessments establish that mitigation is required to avoid and minimize direct and indirect adverse effects on special-status plant and wildlife species, or compensate for unavoidable effects, mitigation shall be developed consistent with the requirements or standards of CEQA, USFWS, CDFW, and local regulations and guidelines.

Comment O12-18

ii. In addition to the mapping that was provided in the DEIR for Plan Bay Area 2050, Figures 3.5-1 to 3.5-4 that depicted the location of Critical Habitat and the locations of Regional Transportation (rail, major minor road, highway and interstate), the DEIR for Plan Bay Area 2050+ should provide similar mapping for the Growth Geographies. As stated earlier, the scale of the mapping provided for the Growth Geographies is inadequate.

Response O12-18

Please refer to the Responses O12-15 and O12-17.

Comment O12-19

iii. Generalized locations of tidal wetlands should be provided in the PBA 2050+ DEIR. As was discussed earlier in this letter, preservation and the long-term sustainability of tidal wetlands is crucial to maintaining the health of the Bay and for providing functions that benefit the residents of the Bay Area. Mapping of this habitat already exists in numerous documents including the Tidal Marsh Ecosystem Recovery Plan[2], the *2015 Bay Ecosystem Habitat Goals Update*[3], *the Adaptation Atlas*[4], and *Tracking Tidal Wetland Extent in San Francisco Bay: A 2020 mapping update*[5]. Direct and indirect impacts of proposed growth geographies, infrastructure, transportation, and shoreline protection projects on tidal wetlands should be assessed, avoided and minimized. This can only be accomplished if the general locations of tidal wetlands with respect to the various growth geographies, PDAs, PPAs, PTAs, etc. are provided.

2 U.S. Fish and Wildlife Service. 2013. "*Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California*." Sacramento, California. xviii + 605 pp.

3 Goals Project. 2015. "*The Baylands and Climate Change: What We Can Do. Baylands Ecosystem Habitat Goals Science Update 2015*." Prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project. California State Coastal Conservancy, Oakland, CA.

4 SFEI and SPUR. 2019. "*San Francisco Bay Shoreline Adaptation Atlas: Working with Nature to Plan for Sea Level Rise Using Operational Landscape Units."* Publication #915, San Francisco Estuary Institute, Richmond, CA.

5 WRMP; Robinson, A; Beers, L; Walker, D; Symonds, J; Grosso, C; Braud, A; Iknayan, K. 2025. *Tracking Tidal Wetland Extent in San Francisco Bay: A 2020 Mapping Update*. SFEI Contribution No. 1234. San Francisco Estuary Institute: Richmond, CA.

Response O12-19

Impacts on tidal wetlands were analyzed in Impact BIO-2, on pages 3.5-45 through 3.5-51 of the Draft EIR. The US Fish and Wildlife Service National Wetlands Inventory identifies tidal wetlands as "Estuarine and Marine Wetlands." A qualitative program level analysis of estimated impacts on estuarine and marine wetlands is included in Impact BIO-2. As discussed in "Master Response 4: Program Level Document," the programmatic analysis in the Draft EIR does not allow for a precise description and mapping of State- and federally-protected wetlands, because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time. However, Mitigation Measure BIO-2 on pages 3.5-48 through 3.5-51 of the Draft EIR requires biological assessments at the project level to reference applicable regional data sources for wetland mapping, which may include, but not be limited to, the Adaptation Atlas (San Francisco Estuary Institute 2021), *Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California* (USFWS 2013), and the 2015 Bay Ecosystem Habitat Goals Update (Goals Project 2015).

Additionally, Table 3.5-9 of the Draft EIR describes the generalized number of acres of estuarine and marine wetlands that are within the transportation project footprint. Table 3.5-8 of the Draft EIR describes the generalized number of acres of estuarine and marine wetlands that are within the sea level rise Adaptation project footprint. Table 3.5-7 of the Draft EIR describes the generalized number of acres of estuarine and marine wetlands that are within the land use growth footprint. To provide more detail than this at the program level would be speculative. For more on the requisite level on environmental analysis in a program-level EIR, please refer to "Master Response 4: Program Level Document."

Comment O12-20

b. Existing Conditions:

We are encouraged by the incorporation of language into Environment Element 1 (EN1) that recognizes that habitats of the Bay are threatened by rising sea levels. We urge that the PBA 2050+ DEIR incorporates the following information regarding the state and international significance of the San Francisco Bay Estuary into the Biological Resources Existing Conditions section:

Response O12-20

These remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment O12-21

i) PBA 2050+ must recognize that the San Francisco Bay Estuary is not just of State importance, but is of hemispheric importance and that this vitally important ecosystem is at risk from the combined effects of shoreline encroachment into former baylands and sea level rise. The San Francisco Estuary is the largest estuary on the west coast of both Americas.

Response O12-21

The description of San Francisco Bay aquatic resources on pages 3.5-17 through 3.5-18 of the Draft EIR includes information about the importance of San Francisco Bay as the largest estuary on the west coast. The information recommended in the comment does not raise environmental issues or concerns

regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-22

ii) San Francisco Bay has been recognized as a "Wetland of International Importance" by the Ramsar Convention. It has been identified as a Hemispheric Reserve for shorebirds by the Western Hemispheric Shorebird Reserve Network. This classification is the Network's highest ranking and the Network states that, "San Francisco Bay holds higher proportions of the total wintering and migrating shorebirds on the U.S. Pacific coast than any other wetland." The Bay supports hundreds of thousands of migratory waterfowl every year and has been designated an Area of Continental Significance for Waterfowl by the federal North American Waterfowl Conservation Plan, and an Important Bird Area by the National Audubon Society. The Bay provides Essential Fish Habitat as identified by the National Marine Fisheries Service and supports hundreds of fish and crustacean species.

Response O12-22

The description of San Francisco Bay aquatic resources on pages 3.5-17 through 3.5-18 of the Draft EIR includes information about the importance of San Francisco Bay for migrating birds and notes that the Bay supports millions of birds annually. Furthermore, the same description discusses the importance of the Bay for fish and invertebrate species. The information recommended in the comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-23

iii) Even with the vast surrounding urban development, the Bay remains one of the premier ecosystems in California. The San Francisco Bay-Delta ecosystem supports over 77% of the State's coastal wetlands and will experience 2/3's of the State's socioeconomic impacts related to sea level rise. Rising sea levels will result in the drowning of the Bay's tidal wetlands habitats if wetlands can no longer keep abreast of rising seas through accretion of sediments or cannot migrate upslope due to human constructed barriers. A recent San Francisco Estuary Institute (SFEI) publication, "*Sediment for Survival*"[6] documents the threat of drowning that Bay Area wetlands will face as sea levels continue to rise and sediment supply to the Bay continues to diminish.

6 Dusterhoff, S.; McKnight, K.; Grenier, L.; Kauffman, N. 2021. *Sediment for Survival: A Strategy for the Resilience of Bay Wetlands in the Lower San Francisco Estuary*. SFEI Contribution No. 1015. San Francisco Estuary Institute: Richmond, CA.

Response O12-23

The comment provides background information but does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-24

iv) Tidal marshes provide essential ecosystem benefits that contribute to the region's biodiversity, provide benefits for our communities, contribute to the region's economy, and provide important climate resilience benefits, for example:

(1) The California Water Quality Monitoring Council states, "Wetland vegetation works as a sediment trap and locks up nutrients and contaminants, thereby preventing concentration downstream that can result in algal blooms or human health hazards …wetlands act as natural water purifiers, filtering and sequestering sediment and pollutants. Two-thirds or more of all the fish and most of the shellfish we consume are dependent on coastal wetlands…"

(https://www.mywaterquality.ca.gov/eco_health/wetlands/extent/types/services.html#:~:text=Wetland%20vegetation%20works%20as%20a,blooms%20or%20human%20health%20hazards.)

(2) Bay Area Water treatment plants are already being asked to upgrade their processes in order to remove more nutrients to help avoid Harmful Algal Blooms. Expanded Bay wetlands will help reduce that threat and the cost imposed on Bay Area residents to achieve that goal. Expanded wetland acreage will help grow our fishing industry as wetlands act as nurseries for many of our fisheries (fish, crabs, oysters, etc.), producing more jobs.

(3) Our Bay's shoreline habitats play a significant role in reducing the impacts of climate change by reducing the impacts of storm surges, acting as barriers that protect communities from flood inundation during high tides. This is why the historically conservative US Army Corps of Engineers is now advocating for the use of Natural and Nature Based Features (the equivalent of Solutions), "Natural and Nature Based Features are landscape features that are used to provide engineering functions relevant to flood risk management, while producing additional economic, environmental, and/or social benefits…" (https://ewn.erdc.dren.mil/natural-nature-based-features/).

(4) Neither the Blueprint or the PBA 2050+ DEIR mention the tremendous ability of tidal marsh habitat to sequester carbon. Tidal marsh vegetation sequesters carbon at a rate ten times greater than tropical forests[7], thus helping in the fight against climate change and sea level rise itself. All these actions not only protect our communities but also provide immense economic benefits, reducing the need to implement other measures to address these issues.

(5) Tourism is one of the Bay Area's key industries and a living Bay, with seals, whales and birds, is one of the attractions that sustains this industry . Current data estimates that around 30% of tourists who visit the Bay Area take at least one ferry ride.

Incorporation of this type of language along with the recommendations we have made regarding the BCDC RSAP, help provide the rationale as to why natural and nature-based solutions should be considered when planning for shoreline adaptation to sea level rise, particularly for Growth Geography or Transportation impacts that have no state of federal regulatory oversight (e.g. for lightly developed or undeveloped lands that could support tidal marsh migration space).

7 National Oceanic and Atmospheric Administration (NOAA) webpage. Coastal Blue Carbon. https://oceanservice.noaa.gov/ecosystems/coastal-blue-carbon/ Accessed September 2024.

Response O12-24

The comment provides background information but does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-25

c) Identification and Analysis of Impacts to Biological Resources

i) Strategy EN 5 refers to "High-Value Conservation Lands," and "high-priority natural lands." How are "high-value" and "high-priority" natural lands identified? Who makes that determination? What criteria are used to make the determination? The determination process should be described in the DEIR. The DEIR should discuss how "high-priority natural lands" will be identified.

(1) Lands identified as "Critical Habitat" for listed species should be considered "high-value" and "high-priority" natural lands.

(2) Undeveloped or lightly developed sites along the edges of the Bay that could support tidal marsh (and other baylands habitats) upslope migration should be considered "high-priority natural lands."

Response O12-25

The Draft Plan Bay Area 2050+ and Draft EIR describe "high-value" and "high-priority" natural lands as areas that provide significant ecological, conservation, and biodiversity benefits. The proposed plan includes environmental strategies intended to protect natural areas and reduce conflicts with open space protection policies, including Strategy EN5, "Protect and Manage High-Value Conservation Lands."

As described in the proposed plan, identification of "high-value" and "high-priority" natural lands would be informed by available scientific data, regional conservation priorities, and coordination with local jurisdictions and other stakeholders. These areas are generally identified based on ecological importance, biodiversity value, habitat sensitivity, connectivity to other natural lands, and potential to support climate resilience and ecosystem services. The proposed plan's conservation-related strategies are intended to align with existing regional conservation planning frameworks and datasets.

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," implementation of plan strategies occurs over time through coordination with local jurisdictions and other partners and refinement of regional frameworks and supporting datasets through subsequent planning and future plan updates.

The Draft EIR evaluates the proposed plan at a programmatic level and does not identify parcel-level conservation priorities or determine project-specific conservation actions for individual sites. The commenter's request for clearer definitions and additional transparency regarding Strategy EN5 terminology, the general criteria and datasets informing conservation prioritization, and coordination processes for implementation is noted. Plan strategies and implementation priorities may be revised over time based on funding availability, performance outcomes, and agency decisions.

Comment O12-26

ii) The DEIR should identify and analyze the direct, indirect, and cumulative impacts of shoreline Growth Geographies on the ability of baylands habitats to migrate landward as sea levels continue to rise. As an example, the adverse impacts of development, transportation, recreation and sea level rise adaptation projects should be analyzed regarding their potential impacts on the ability of tidal wetlands to migrate inland as sea level rises, exacerbating and resulting in the drowning of wetlands. Seawalls and traditional levees can result in erosion of adjacent habitats.

"*Restoring the Estuary – A Framework for the Restoration of Wetlands and Wildlife in the San Francisco Bay Area - 2022 Implementation Strategy*"[8] by the San Francisco Joint Venture, recommends the conservation of 14,000 acres of "adjacent uplands," because "...they can provide important connectivity, sediment transport, and migration space [for bay habitats] as sea level rises." In addition, the report recommends the protection of 16,500 acres of "upland transition zone" and restoration of 15,100 acres of "upland transition zone." The stated updated goals of this Implementation Plan are to "include areas that will provide marsh migration [space], high tide refugia, and shoreline resiliency."

8 San Francisco Joint Venture. 2022. "*Restoring the Estuary – A Framework for the Restoration of Wetlands and Wildlife in the San Francisco Bay Area*." Richmond, CA.

Response O12-26

Please refer to Responses O12-15 and O12-17.

Comment O12-27

iii) If compensatory mitigation is proposed for potential impacts to biological resources that cannot be avoided or minimized, proposed mitigation ratios should:

(1) be high enough to:

(a) Offset the temporal losses of wetland or riparian functions and values and to ensure "no net loss of wetlands" as required by the State's Wetlands Conservation Policy (Executive Order W-59-93).

(b) Take into consideration the limited locations in the Central and South Bay where tidal marsh (and other baylands habitats) can be created/restored, or enhanced

(2) Take into consideration the fact that analyses of compensatory mitigation for habitat loss have often concluded that compensatory mitigation often fails to replace lost functions or values.

(3) Should consider the crucial role that existing natural baylands habitats have in mitigating the impacts of climate change.

(a) A one-to-one mitigation ratio is setting the bar too low. The National Research Council in 1992 recommended ratios of at least three, five, or ten acres of mitigation wetlands or streams for every acre of wetland or stream destroyed depending on its functional value.

We deeply appreciate that EN-1 mentions the dedication of sufficient funds to support 100,000 acres of marsh restoration regionwide. However, without an assessment of whether shoreline-located Growth Geographies could adversely impact current baylands habitats, as well as areas that could support these habitats as sea levels continue to rise, this long-range strategy is likely to fall short.

Response O12-27

Mitigation Measure BIO-2 on pages 3.5-48 through 3.5-51 of the Draft EIR states: "In keeping with the 'no net loss' policy for jurisdictional waters (i.e., wetlands and other waters of the United States or State), project designs shall be configured, whenever possible, to avoid wetlands and other waters and avoid disturbances to wetlands and riparian corridors to preserve both the habitat and the overall ecological functions of these areas." The biological resources impact discussion notes several times that a standard of "no net loss" of wetland acreage and value is required by state and federal agencies with jurisdiction over wetlands. If compensatory mitigation is determined to be required at the project level, consultation with the applicable resource agency would be required, and the appropriate mitigation ratio would be determined at that time based on the resource and location. The Draft EIR (in Mitigation Measure BIO-2) sets a minimum mitigation ratio of 1:1 to ensure that the mitigation ratio can be no lower than no-net-loss for projects taking advantage of streamlined environmental review. In most cases, the mitigation ratio will be greater than 1:1 dependent on the consultation at the project level.

Please also refer to Responses O12-15 and O12-17.

Comment O12-28

6. Climate Change

a. The DEIR has not sufficiently identified the impacts of the proposed Growth Geographies on built or natural environment. The DEIR should provide mapping of the Growth Geographies overlaying mapping of the 4.9' total water levels from projected sea level rise for the identification of Growth Geographies of new development/infrastructure or redevelopment/relocation of existing development/infrastructure that would be at risk with implementation of PBA 2050+. This would

provide a better understanding of impacts to the built and natural environment resulting from the location of Growth Geographies in areas that are projected to be vulnerable to flood risk due to rising sea levels, major storm events, or groundwater rise.

Response O12-28

As described in Section 2, "Project Description," within the third paragraph on page 2-16 of the Draft EIR, an analysis of the potential effects of sea level rise on the Bay Area is not required under CEQA:

> While the plan has incorporated sea level rise adaptation projects as a plan component, it is important to note the effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions, as concluded by the California Supreme Court (see California Building Industry Association v. Bay Area Air Quality Management District [2015] 62 Cal.4th 369, 377 ["we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."]). Changes to the State CEQA Guidelines to reflect this decision were adopted on December 28, 2018. Accordingly, while the proposed plan contains elements that would reduce the effects of sea level rise, the EIR analysis generally does not address the impacts of existing environmental conditions on a project's future users or residents. However, when a proposed project risks exacerbating environmental hazards or conditions that already exist, the EIR analyzes the potential impact of such hazards on future residents or users.

As discussed under the "Sea Level Rise Adaptation Projects" heading on pages 2-15 and 2-16 of Chater 2, "Project Description," of the Draft EIR, the proposed plan has integrated the issue of sea level rise inundation and identifies Strategy EN1, "Adapt to Sea Level Rise," to protect shoreline communities affected by up to 4.9 feet of sea level rise inundation by identifying a series of sea level rise adaptation projects. Sea level rise adaptation is described on pages 2-15 through 2-17 of the Draft EIR, under the subheading, "Sea Level Rise Adaptation Infrastructure."

Furthermore, to the extent that impacts to wetland migration could be caused or exacerbated by development within projected levels for sea level rise, it is not feasible to analyze these impacts with specificity at the program-level. To the extent that these impacts are appropriate to analyze at the program-level, they are analyzed in Chapter 3.5 of the Draft EIR. The overall sea level rise adaptation projects footprint was assumed strictly for modelling purposes and to provide estimated financial inputs for the proposed plan and are not intended to be prescriptive in either specific location or depiction. Local planning efforts would determine the appropriate adaptation measures, because MTC and ABAG do not hold land use authority over the coastline and cannot implement such measures. The environmental impact analysis in Chapter 3 of the Draft EIR includes an evaluation of the environmental impacts related to the proposed sea level rise adaptation projects. Impacts associated with sea level rise adaptation projects were analyzed in the Draft EIR according to the assumed footprint of the project. However, as discussed above, the specific location or depiction of infrastructure is not known at this time, and specific beneficial and adverse effects therefore cannot be evaluated in detail. Detailed analysis of sea level rise adaptation projects will ultimately be done when specific projects are proposed by relevant local agencies.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Comment O12-29

b. The DEIR must identify Growth Geographies that overlay PCA Eligibility Areas for Natural Lands and Climate Adaptation.

Response O12-29

The comment states that the Draft EIR must identify Growth Geographies that overlay PCA Eligibility Areas. However, the comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-30

c. The DEIR must analyze the direct, indirect and cumulative impacts of Growth Geographies on the climate resilience of shoreline communities.

Response O12-30

The level of detail for the Draft EIR analysis is explained in page 3.1-4:

> As a program-level EIR that addresses the entire nine-county, 101-city region, this document does not address the impacts of individual land use and transportation projects in detail; the focus of this analysis is on addressing the impacts of implementation of the plan's 35 strategies as a whole. The analysis considers the impacts of the proposed plan in terms of the forecasted development pattern ("land use growth footprint"), sea level rise adaptation projects ("sea level rise adaptation projects footprint"), and transportation projects and programs ("transportation projects footprint"). The impact discussions generally disclose the potential effects of the proposed plan at two levels of geography: (1) at the regional level, which covers the Bay Area as a whole; and (2) where relevant, at the county level, which covers each Bay Area county.

Therefore, no specific direct, indirect and cumulative impacts on the climate resilience of shoreline communities are discussed in the Draft EIR. In addition, approximately 74% of the land use growth footprint would be in one of the proposed plan's designated Growth Geographies (page 2-15). The direct, indirect and cumulative impacts of Growth Geographies are encompassed in the analysis of the land use growth footprint throughout the Draft EIR.

Comment O12-31

d. We firmly support the proposed language of the "Strategy Long Descriptions" for EN1 that prioritizes the use of nature-based actions, but suggest for consistency with the terminology used in BCDC's RSAP Guidelines, that the term be changed to "natural and nature-based solutions."

Response O12-31

The commenter's recommendations are noted. Plan strategies and implementation priorities may be revised over time based on funding availability, performance outcomes, and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding strategy revisions. Additionally, second paragraph on page 3.11-17 has been revised as follows:

> The RSAP guidelines emphasize the importance of incorporating natural and nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. Local jurisdictions within BCDC's jurisdiction must consider RSAP guidance when developing or updating their general plans, Local Coastal Programs (LCPs), and zoning codes to ensure consistency with regional adaptation priorities (BCDC 2024).

Comment O12-32

e. The PBA 2050+ DEIR should include and recognize climate adaptation strategies that avoid placing new development/infrastructure or redevelopment or relocation of existing infrastructure in areas that have been identified as vulnerable to existing or future flood inundation (total water level of 4.9').

Response O12-32

The commenter's recommendations are noted. Plan strategies and implementation priorities may be revised over time based on funding availability, performance outcomes, and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision and implementation priorities.

Comment O12-33

7. Alternatives for Consideration

a. The DEIR considered but eliminated, an alternative that avoids placing new development/infrastructure or redevelopment or relocated infrastructure in areas that will be inundated by 4.9' total water levels and do not have identified sea level rise adaptation strategies. We urge that such an alternative be included in the DEIR. The reasons for such an alternative are:

   i. Economics - the report[9] authored by MTC-ABAG and BCDC of the anticipated $105 billion dollar shortfall for protecting development and infrastructure that currently exists by 2050 – why would we place new development in areas that are vulnerable to sea level rise and groundwater rise when we have such a huge shortfall in funding to protect existing development and infrastructure?

   ii. Placing new development/infrastructure or redevelopment/relocated infrastructure in areas that could provide migration space for baylands habitats, or areas where natural and nature-based solutions could be implemented, adversely impacts the long-term sustainability of the natural and built environment.

   iii. Wang et al[10] have noted "…measures to prevent flooding along an embayment shoreline in one location or subregion may increase inundation elsewhere in the system." We are one Bay. Water displaced by raised fill pads, seawalls or levees at one location must flow elsewhere. Wang et al go on to state:

> "The network of interactions occurs not only within subbasins of the Bay but also across the greater geographic extent from one end of the Bay to the other, and local jurisdiction may have either reciprocal relationships with or asymmetric impacts on one other. Importantly, the nature of the interaction network is seen to evolve with SLR: interactions are purely subregional at current sea level but with higher sea level (e.g., 1 m of SLR), not only do the subregional interdependencies strengthen but also regional interdependences emerge."

With this in mind, the fact that a governance gap exists due to our lack of regional control over how adaptation to sea level rise differs from one shoreline community to the next increases the likelihood of indirect impacts in which distant shorelines face flooding and inundation due to hard-edged shoreline protections elsewhere in the bay. This could have consequences throughout the region as sea level inundation rates increase. Water deflected from engineered fill pads, levees or seawalls designed to protect new development from the 100-year flood or sea level rise, has consequences for adjacent communities. As mentioned previously, these types of projects can also have significant and adverse impacts to tidal wetlands resulting in the drowning of wetlands or degradation through erosion, etc. It is the intent of BCDC's RSAP Guidelines to avoid some of these unintended consequences of one local government adversely impacting neighboring and distant communities by insisting on a regional perspective when developing SSAPs.

The San Francisco Bay Regional Coastal Hazards Adaptation Resiliency Group (CHARG), is "an organization of flood managers and scientists responsible for reducing flood risk in the San

> Francisco Bay area." CHARG has created a series of maps for the Bay Area counties that depict "Sea Level Rise Connectivity Between Bay Area Jurisdictions" that can be viewed on their website: https://sfbaycharg.org/our-work/jurisdiction-connectivity/
>
> We believe this is an admirable effort, but it only addresses impacts related to identified flood control projects, not those associated with development, transportation or recreational trails. The strategies utilized to address sea level rise inundation for these other types of projects can also contribute to localized or regional exacerbation of sea level rise impacts. BCDC has utilized the CHARG data set and provided mapping for the RSAP at: https://rsap-open-data-bcdc.hub.arcgis.com/datasets/hydraulic-connectivity-charg-2020-/explore

It is clear, therefore, that one of the DEIR alternatives must have the RSAP/SSAP incorporated into the PBA 2050+ in order to provide the regional approach to SLR impacts necessitated by the anticipated 4.9 feet of sea level rise by 2050 and the recognized impacts it will bring to shoreline communities, Bay habitats and wildlife, and to the economic and environmental benefits the Bay provides. The DEIR must analyze the negative impacts that would occur in failing to adopt such an alternative.

9 Metropolitan Transportation Commission/Association of Bay Area Governments (MTC/ABAG) and Bay Conservation and Development Commission (BCDC). "*Sea Level Rise Adaptation Funding and Investment Framework Final Report*." July 2023.

10 Wang, R.-Q., Stacey, M. T., Herdman, L. M. M., Barnard, P. L., & Erikson, L. (2018). "The influence of sea level rise on the regional interdependence of coastal infrastructure." *Earth's Future*, 6, 677– 688. https://doi.org/10.1002/2017EF000742

Response O12-33

Please refer to "Master Response 3: Plan Alternatives" regarding alternates chosen for evaluation in the Draft EIR. CEQA requires EIRs to evaluate alternatives to the proposed project that could feasibly attain most of the basic project objectives and that would avoid or substantially lessen any of the significant environmental impacts. In recognition of the nearly endless range of potential project variations, an agency is not required to analyze every conceivable alternative, but is instead governed by the rule of reason. There are numerous reasons why an agency may decline to analyze an alternative proposed by the public or another agency. Please refer to Section 4.2.3, "Sea Level Rise Alternative," on page 4-6 of the Draft EIR for a discussion of why the suggested alternative was not evaluated further in the Draft EIR.

Comment O12-34

Other Comments:

p. 3.5-18 – Riprap – Riprap may indeed simulate rocky shoreline habitat and provide habitat for wildlife, however, in areas adjacent to tidal marsh habitat and particularly habitat that supports the endangered salt marsh harvest mouse (SMHM), riprap can also provide habitat for nuisance species, such as the Norway rat, that may have adverse impacts on the SMHM. Breaux[11] reported:

> "Rats which are found in San Francisco Bay marshes are more likely to be roof than Norway rats (Jurek, pers. comm.). Where urbanization abuts natural marshes as it does in many areas of the South Bay, and garbage provides a food supply, Norway rats are likely to find the marsh habitats quite hospitable. In 1927, DeGroot noted that reclaimed land behind dikes along the San Francisco Bay shoreline was responsible for an increase in rats and a decrease in native California clapper rails (*Rallus longirostris obsoletus*): "No sooner is a dyke constructed than Norway rats appear in great numbers. Large gray fellows they are, on a dark night appearing to be as large as small cotton-tail rabbits....The Clapper Rail has no more deadly enemy than this sinister fellow" (DeGroot 1927)." [emphasis added]

And:

> "Control of rats has not been implemented and continues to be a problem in the South Bay for endangered species, such as clapper rails and, quite possibly, salt marsh harvest mice (*Reithrodontomys raviventris*). Additional threats to other target species selected by this project as representative of wetland species in the San Francisco Bay region (e.g., California voles (*Microtus californicus*), ornate shrews (*Sorex ornatus californicus*), salt marsh wandering shrews (*Sorex vagrans haliocoetes*), and amphibians, reptiles, terrestrial invertebrates in general, and some ground nesting birds) probably occur."

An adverse impact of particular concern is the difficulty in controlling nuisance species once they gain a foothold in an area. Breaux[12] states:

> "Control measures are difficult, since there is no poison specific to rats that is safe for endangered mammals, such as the salt marsh harvest mouse. Given the difficulties in any control programs (e.g., public outcry against removing feral cats and the difficulty of trapping or shooting these large rodents) the most effective control measure at this time is to protect marshes with large buffers, and to keep shelter and garbage far from the wetland edge."

As mentioned by Breaux, there is no control measure that would be specific to rats, that would not adversely impact small mammals, such as the endangered salt marsh harvest mouse, raptors, owls, and domestic pets that do not observe the prohibition against free-roaming pets.

11 Breaux, Andrée. Non-Native Predators: Norway Rat and Roof Rat *Rattus norvegicus* and *Rattus rattus* Goals Project. 2000. Baylands Ecosystem Species and Community Profiles: Life histories and environmental requirements of key plants, fish and wildlife. Prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project. P.R. Olofson, editor. San Francisco Bay Regional Water Quality Control Board, Oakland, Calif.

12 *Ibid*.

Response O12-34

The text in question regarding riprap is describing existing conditions in bay shore areas, where riprap is currently present. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment O12-35

p.3-5-22 – Priority Conservation Areas – Draft Priority Conservation Area Refresh Mapping Viewer –This map of "High Resilience Lands," "Essential and Important Lands," and "Significant Habitat" does not reflect decades of peer-reviewed work that identifies areas of baylands that are recommended for protection, restoration or enhancement. Nor does it show areas that could provide natural and nature-based solutions to the threat of sea level rise. We urge that the information contained in documents identified in the DEIR such as the *Baylands Ecosystem Habitat Goals* (and update) – a report of recommendation prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project (originally published in 1999 by the U.S. Environmental Protection Agency – EPA – and the San Francisco Bay Regional Water Quality Control Board – RWQCB and updated in 2015), and the *Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California* published by the U.S. Fish and Wildlife Service (USFWS) in 2013 – a report that identified lands important for tidal marsh habitat and listed and rare species dependent upon tidal marsh habitats, be incorporated into the determination of "Essential and Important Lands" and "Significant Habitat." Additionally the information contained in the SFEI Resilience Metrics Mapbook" should be utilized to identify "High Resilience Lands."

Response O12-35

The commenter provides recommendations regarding the datasets and scientific resources used to inform Priority Conservation Area (PCA) planning framework mapping, including mapping categories

related to resilience, habitat value, and conservation priority. The proposed plan's Environment Element includes strategies intended to protect natural and working lands and support climate adaptation, including sea level rise resilience and nature-based solutions where feasible.

PCAs are nominated by local governments. Although PCAs are not part of the Growth Geography framework, they are geographic areas used to help target planning, policy, and implementation activities related to conservation and natural and working lands, and are thus complementary to the proposed plan's growth framework. The Draft EIR evaluates the proposed plan at a programmatic level and does not establish parcel-level conservation designations or prescribe the specific datasets that must be used for conservation mapping frameworks.

As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," MTC and ABAG coordinate with local jurisdictions and other partners to refine regional frameworks and supporting datasets over time through collaborative planning and future plan updates.

Comment O12-36

p.3.5-36 Methods of Analysis – should identify and include as impacts on biological resources, impacts of the proposed Growth Geographies on areas that could provide tidal marsh migration space. These areas should be considered "ecologically sensitive or significant areas" as without preservation of these spaces, tidal marsh habitat will drown with rising sea levels.

Response O12-36

Impact BIO-2, on Draft EIR pages 3.5-44 through 3.5-50, describes potential impacts on riparian habitat, State- or federally protected wetlands, and other sensitive natural communities. As a program-level EIR, the Draft EIR presents estimates of impacts on these resources based on available mapping; however, it is assumed that additional sensitive natural communities or wetlands would be identified during future project-level review. Please refer to "Master Response 4: Program Level Document." The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts, because details related to the location, size, design, or setting of specific projects are unknown and therefore, a meaningful evaluation could not occur at this time. As described in Mitigation Measure BIO-2, on pages 3.5-45 through 3.5-51 of the Draft EIR, a biological resource assessment would be prepared at the prepared for future projects. The biological resource assessment would be required to include identification of riparian habitat, state- or federally protected wetlands, and other sensitive natural communities. Because upland areas within the wetland-upland transition zone often contain vegetation associated with wetlands or are occupied by special-status wildlife species, areas adjacent to tidal marshes may qualify as state- or federally protected wetlands, sensitive natural communities, or special-status species habitat. In those cases, mitigation to reduce impacts on this habitat would be developed as part of the biological resource assessment and implemented at the project level.

Please also refer to the responses to comments O12-15 and O12-17.

Comment O12-37

Need for consistency in identifying regulatory and resources agencies that should be consulted with. For example for any issue involving waters of the U.S. (WOTUS) or waters of the State (WOTS), both the U.S. Army Corps of Engineers (Corps) and the RWQCB should be consulted with. Similarly for any issue involving wildlife coordination with both the USFWS and the California Department of Fish and Wildlife (CDFW) should occur, and if fisheries are involved the National Oceanic Atmospheric Administration (NOAA) Fisheries should be coordinated with. Any work in WOTUS or WOTS, even if temporary, may require a permit from both the Corps and RWQCB.

Response O12-37

Mitigation Measure BIO-2 on pages 3.5-48 through 3.5-51 of the Draft EIR requires project sponsors to consult with and seek permit approval from the appropriate resource agencies (e.g., USACE, RWQCB, CDFW, BCDC, CCC) for impacts on waters of the United States or state, and Mitigation Measure BIO-1(a) on pages 3.5-38 to 3.5-40 of the Draft EIR requires coordination with CDFW, USFWS, and NOAA Fisheries, as appropriate, for impacts on special-status wildlife. The information requested in this comment is already included in the Draft EIR, and the specifics of the agency consultation process would be determined for individual projects as they come forward.

Comment O12-38

Conclusion:

The Environment Element of Plan Bay Area 2050 leaned heavily into the issue of environmental hazards and threats to human health and well-being. While these are certainly important concerns, we are encouraged that the information regarding updates to EN1, EN 4 and EN5, begins to describe the important role the habitats of the Bay play in supporting biodiversity, providing climate resilience for the natural and built environments, and human health and well-being. The impacts of the Growth Geographies on the natural environment need to be more clearly identified (even at the programmatic level), analyzed, avoided, minimized and appropriate mitigation proposed in the DEIR. And it is imperative that BCDC RSAP Guidelines be incorporated into PBA 2050+ in a manner that will avoid conflicts and inconsistencies between the two plans. Lastly, it is important that the updated PCA program be incorporated into PBA 2050+. We appreciate the opportunity to provide Scoping comments and request that we be alerted to future opportunities for review and comment on PBA 2050+ documents.

Response O12-38

Please refer to Responses O12-7 through O12-11 and O12-14 and O12-15 regarding the Growth Geographies in the proposed plan.

Please refer to Responses O12-2 through O12-6 for incorporation of the BCDC RSAP Guidelines in the Draft EIR.

Please refer to Responses O12-12 through O12-15 regarding the PCA program.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O13 Bay Area Transportation Working Group

Gerald Cauthen, President
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment O13-1

To the Metropolitan Transportation Commission and ABAG:

The Bay Area Transportation Working Group (BATWG) is a group of transportation professionals and activists that are dedicated to creating a balanced transportation system for the Bay Area. BATWG offers these comments concerning the Plan Bay Area 2050+ (PBA2050+) Regional Transportation Plan, especially the “Draft Transportation Project List Report,” and related environmental impacts.

MTC-ABAG Have Failed to Inform the Public Adequately About Billions of Dollars of New Taxes, Fees, and Tolls in PBA2050+: "Freeways" Converted Into "Tollways". These "New Revenues" Are Too Speculative to Serve as the Basis for a "Fiscally-Constrained" Project List, Which Must Be Re-Evaluated and Reduced.

First, BATWG strongly criticizes MTC and ABAG for their failure to inform the public adequately about the major proposal for billions of dollars of new taxes, tolls, and fees that is buried deep in the bowels of PBA2050+. As discussed below, these "new revenues" are too speculative to serve as the basis for a "fiscally-constrained" project list. Therefore, the transportation project list must be re-evaluated and reduced.

The PBA2050+ "Draft Technical Assumptions Report" includes new taxes, tolls, and fees, including

- Plan Bay Area 2050+ Next Generation Freeways Pricing Strategy: $20 billion
- Plan Bay Area 2050+ Parking Pricing Strategy: $12.3 billion

If PBA2050+ were truthful, it would refer to the proposal as "freeways converted into tollways."

The "Draft Technical Assumptions Report" explains both of those new taxes, tolls, and fees:

> Plan Bay Area 2050+ includes a strategy to institute peakperiod distance-based tolling on all Bay Area highways, or an equivalent pricing strategy, beginning no later than 2035. The distance-based fee is envisioned to range between 10 cents and 30 cents per mile during peak periods on weekdays, varying by vehicle occupancy, congestion levels, time-of-day, and direction of travel. ...
>
> The Plan Bay Area 2050+ strategy to expand transportation demand management initiatives includes an envisioned increase in parking costs, no later than 2035, in Plan Bay Area 2050+ Growth Geographies, which are areas prioritized for housing and job growth in the plan. Parking fees would increase by 25% from the baseline levels in Transit-rich Areas (TRAs); and free parking would no longer be available in all Growth Geographies. (p. 13.)

Both of these proposed "new revenues" streams have significant legal and political hurdles that are not disclosed or discussed in the Plan. BATWG is unaware of any existing legal authority that would permit any government agency "to institute peakperiod distance-based tolling on all Bay Area highways." A fundamental flaw of the RTP is that MTC-ABAG assumes the existence of $32.3 billion in revenues from these two new taxes without any assessment of the likelihood that these new taxes ever will be imposed.

The proposed RTP is heavily dependent upon these two "new revenues," which may not actually materialize. The Draft Transportation Project List Report states:

> While near-term fiscal capacity is constrained, the second period of the plan (FY 2036–2050) reflects greater revenue potential. This is due in part to inflation, the lasting effects of the 2020 economic downturn and the anticipated introduction of new transportation revenues beginning in 2035. As shown in Table 1, only $149 billion of the $512 billion in total revenues are available in the first period, which limits the scale of early investments. Some additional support is provided by a portion of the flexible category, while the later years of the plan allow for a broader set of regionally significant projects. (p. 9.)

So if the new Freeway Tolling and/or Parking Fees "pricing strategies" do not materialize, then the "fiscally-constrained project list" is unrealistic.

Many of the assumptions in the "Transportation Revenue Forecast Summary Table" (Table 2-2, pp. 14-29), especially the "NEW REVENUES" section, are fundamentally flawed and cannot serve as the basis for a "fiscally-constrained project list."

- The "Regional Revenue Measure" on page 28 "[a]ssumes a 0.5% sales tax in all nine counties, starting in FY 2027-28." But MTC knows that will not happen because SB 63, sponsored by MTC and enacted by the Legislature in 2025, limits the 2026 sales tax increase to just five counties. MTC needs to recalculate the revenue assumptions, with revenues from four counties subtracted.

- The "Anticipated/Unspecified" "new revenues" amounting to $22.7 billion on page 27 are so vaguely defined that they cannot serve as a reasonable basis for a "fiscally-constrained project list" in an RTP.

BATWG is unaware of public disclosure of MTC's intention to impose tolls on SR 37 ("Other New User Fees," p. 28).

The Regional Transportation Plan proposed in PBA2050+ is founded upon the imposition of those new taxes, tolls, and fees. The capital projects, especially in the year 2035 and thereafter, especially are dependent upon those new taxes, tolls, and fees. Due to these "fiscal constraints," many of the proposed projects are not realistic and must be deleted from the "fiscally-constrained project list." MTC needs to disclose to the public which projects would be eliminated or reduced in scope (including how they would be reduced in scope) if the new taxes, tolls, and fees were not to materialize.

BATWG also is concerned about the "equity" aspects of the new taxes, fees, and tolls proposed in PBA2050+. In June 2018, many working class communities around the Bay Area voted "no" on the Regional Measure 3 (RM3) bridge toll increase. These communities included Richmond, San Pablo, Hayward, Concord, Pittsburg, Antioch, Fairfield, and Vallejo. BATWG is unaware of any "public information" efforts anywhere, especially in those impacted communities, about the new taxes, tolls, and fees that PBA2050+ proposes. MTC, ABAG, and PBA2050+ claim to care about "equity," but their failure to communicate the "new revenues" proposal, especially to impacted communities, demonstrates that MTC and ABAG do not "practice what they preach" about "equity."

Response O13-1

The proposed plan identifies both existing and potential future revenue sources. Implementation of plan strategies would occur over time through future actions by multiple agencies and governing bodies. Many potential future funding sources would require separate legislative action and/or voter approval and are not guaranteed.

The Draft EIR evaluates potential environmental impacts associated with the proposed plan at a programmatic level and does not constitute a financial audit or funding commitment document. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" for additional discussion of plan funding assumptions, fiscal uncertainty, and implementation considerations.

Comment O13-2

Fundamental Flaws in MTC-ABAG Projections for 2050.

Second, there are fundamental flaws in data at the foundation of PBA2050+. In DEIR Table 2-14 on page 2-29, MTC-ABAG's population forecast from 2020 to 2050 is a 24 percent increase. That is much larger than the California Department of Finance (DOF) projections, 5.2 percent.1 The DOF forecasts a nine-county Bay Area population of 7,747,408 in 2020, rising to 8,149,816 in 2050 (a 5.2% increase). MTC-ABAG projects a much larger 9,586,000 population in 2050. There is a very significant and material difference

between the MTC-ABAG and DOF population projections, with Plan Bay Area projecting an additional 1.4 million population in 2050 than the DOF forecast.

The FEIR should re-evaluate all of the environmental impacts throughout the plan using both the MTC-ABAG (9,586,000 population in 2050) and the DOF (8,149,816 population in 2050) projections. The smaller Bay Area population in 2050 in the DOF projections should result in very significant differences in transportation- and housing-related environmental impacts.

Response O13-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment O13-3

The "Valley Link" Project Must Be Re-Evaluated In Light of MTC's Interregional Project Policy and the Sponsoring Agency's Admission of Project Cost Escalation and Changes to the Project Definition. MTC Commissioners Cannot Violate MTC Resolution No. 4399.

This comment concerns RTPID No. 25-T12-177, "Rail | Service Expansion |Between San Joaquin County and Dublin/Pleasanton ("Valley Link")." The RTP project description is, "This program includes funding to implement new rail service between San Joaquin County (Mountain House) and Dublin/Pleasanton, including three new stations in Alameda County and four-car trains (12 minute peak headways)."

The capital cost in the RTP, "$2,375" million ($2.375 billion) for a project from East Dublin BART station to Mountain House is inconsistent with the capital cost range of $3.794 billion to $4.465 billion presented to the Regional Rail Authority Board in the agenda packet for the June 11, 2025 meeting. Assuming that the project definition remains unchanged in the RTP, then the RTP must increase the capital cost for the Valley Link project by at least $1.4 billion. As a result, the rest of the Transportation Project List must be adjusted (with other projects dropped or reduced in scope) in order to meet the "fiscally-constrained" requirement for an RTP.

In December 2019, MTC adopted an "Interregional Project Funding and Coordination Policy" (MTC Resolution No. 4399), in part because then-San Jose Mayor San Liccardo voiced concern at MTC meetings that the Valley Link project was diverting scarce fiscal resources from transportation projects that actually have regional benefits, especially ACE.

MTC commissioners cannot include the Valley Link project, as defined in the Draft Transportation Project List Report, in this RTP because that project definition does not comport with MTC's "Interregional Project Funding and Coordination Policy" in MTC Resolution No. 4399. MTC's Interregional Project Policy states in part, "The Interregional Project must be consistent with the Regional Transportation Plan (RTP) for MTC and the applicable Metropolitan Planning Organization (MPO)/Regional Transportation Planning Agency (RTPA)."

The Valley Link project definition proposed in MTC's RTP is inconsistent with the current RTP for the San Joaquin Council of Governments (SJCOG), approved in 2022. The SJCOG "Plan Project List" is in Appendix F. (See: https://www.sjcog.org/DocumentCenter/View/8738/Appendix-F---2022-RTP-Project-List---Final) The Valley Link project component in SJCOG's RTP is "2022 RTP MPO ID SJ18-6011" (Table 6-6: 2022 Regional Transportation Plan Project List - Rail Corridor Improvements Category). The "project limits" are "[b]etween BART and ACE in TriValley." The "project description" is

> Improve the Union Pacific Railroad right -of-way from the San Joaquin County Line for a passenger rail service. Construction of a station and platform to accommodate the new passenger rail service with parking and access ontoPatterson Pass Road. Construction of an operations andmaintenance facility at Hanson Road in Tracy along the alignment.

That project description in the 2022 SJCOG RTP is entirely inconsistent with the project description that MTC has proposed for PBA2050+. The City of Mountain House, where MTC envisions a station, is more than a mile away from Patterson Pass Road, where SJCOG's RTP places the only Valley Link station in San Joaquin County.

The sponsoring agency, the Tri-Valley-San Joaquin Valley Regional Rail Authority, is in the process of significantly curtailing the Valley Link project. A "Value Engineering" study in January 2025 identified potential cost savings by significantly altering the Valley Link project. The Regional Rail Authority Board voted on June 11, 2025 to support a modified project with a portion of a different alignment, connecting to the Vasco ACE station.

Now that the Regional Rail Authority is receptive to studying other connections between BART and ACE, BATWG believes that MTC should require the Regional Rail Authority to study solutions that are more cost-effective, especially an express bus system that utilizes the HOV/Express Lanes on I-580. In 2004, the text Regional Measure 2 (RM2) promised voters that "a carpool-lane direct connector to Dublin BART" would be considered. The RM2 law, Streets and Highways Code section 30914, subd. (c)(32), states in part, "Provide rail or High-Occupancy Vehicle lane direct connector to Dublin BART and other improvements on I-580 in Alameda County for use by express buses." For the past 20 years, MTC has ignored its legislative mandate and the promise made to RM2 voters that it would consider an express bus alternative in this corridor. Express buses could connect BART and ACE on the I-580 corridor through a project that would be far cheaper and could implemented far sooner than a "Valley Link" rail project.

The "$679" million operating cost for Valley Link in the RTP is another reason why the Valley Link project must be re-evaluated before it can be accepted into the RTP. The Valley Link project will require a sizable operating subsidy, yet there is no identified source to fund that operating subsidy. By including a new transit system in the RTP, MTC commissioners are undermining their claims that voters must support the SB 63 sales tax increase to fund operating subsidy shortfalls in existing transit systems. Therefore, the Valley Link project, as currently defined in the RTP, is not fiscally constrained.

The BART "Silicon Valley Phase II" Project Must Be Re-Evaluated

This comment concerns RTPID No. 25-T12-180, "Rail | Service Expansion | BART | Santa Clara ("Silicon Valley Phase II")." BATWG has criticized this project extensively in recent years. It is much costlier than it needs to be. See, e.g., https://batwgblog.com/2024/01/01/that-giant-sucking-sound-from-san-jose/.

The BART "Silicon Valley Phase II" project is the most expensive project in this RTP. The capital cost is listed in the RTP as $12.2 billion. The operating cost is $1.257 billion. Furthermore, the capital cost inevitably will increase. The required operating subsidy for the BART Silicon Valley Phase II, which opened for revenue service in 2020, has exceeded projections due to much lower than anticipated farebox revenue. Therefore, MTC especially must carefully scrutinize this project, especially its effects on the "fiscal constraints" of the entire RTP. Like other poorly-planned mega-projects, such as the Bay Bridge Eastern Span replacement, the BART "Silicon Valley Phase II" project has the potential to consume considerably more resources than planned.

As part of this RTP "fiscally constrained project list" analysis, MTC needs to undertake a thorough re-evaluation of the costs and cost-effectiveness of this project. MTC should require the project sponsors (including VTA and BART) to subject this project to independent evaluation and analysis, akin to the "value engineering" report that identified cost savings for the Valley Link project. MTC should not allow the flawed and wasteful "single bore tunnel" design of this BART project to throw billions of dollars of scarce transportation funding literally into a hole in the ground.

The independent evaluation and analysis should consider alternatives to the "single bore tunnel" that are less costly, have lower environmental impacts (due to less soil removed during excavation and transported away), provide better projected ridership, and are safer for facility users. The "single bore tunnel" would result in stations that are deep underground. Patrons would be dissuaded from using a deep underground BART station that requires too many minutes for ingress and egress. The extra travel time would not only inconvenience travelers under ordinary circumstances, but also could be a life-or-death matter during emergencies. "Twin bore tunnel" and/or "cut-and-cover" construction methods likely would be far less expensive and better for station users.

BATWG has heard that the project sponsors have not conducted adequate "soil profiles" before proceeding with the "single tunnel bore" construction. BATWG is concerned that another tunnel-boring machine disaster as occurred in Seattle also might occur on this project. (See, e.g., https://seattlebusinessmag.com/policyregulations/who-killed-bertha-why-seattle-tunnel-disaster-isnt-what-it-seems-and-whywsdot-making/)

BATWG cannot find any environmental report for the switch to the "single tunnel bore" method. The amount of soil removed is significantly higher than for other construction methods. BATWG cannot find any environmental report that discusses the increased "muck" volume, the increased truck hauls, the ventilation tower removals, and/or the platform depth associated with the change to the "single tunnel bore."

VTA Rail Projects in the RPT Deserve Additional Scrutiny.

BATWG has long been critical of the poor planning in VTA's light rail system. Transit project scholars, along with FTA, MTC, VTA, and other entities, should especially scrutinize the disastrous Almaden VTA light rail extension. It is notorious as the only passenger rail line constructed in the United States in the late 20th century that was abandoned within 20 years after completion. (See, e.g., https://www.trainorders.com/discussion/read.php?4,4911840, which claims that VTA's Almaden line is the "first federally-funded light rail line built after 1980 to ever cease service.)

Before MTC, VTA, and FTA spend more money on new VTA rail projects, they ought to carefully study what has gone wrong with past MTC- and FTA-funded rail projects planned and built by VTA, especially the abandoned boondoggle that was the Almaden light rail line.

"Dumbarton Rail" Should Be Included in the RTP Transportation Project List.

BATWG supports closing the "Dumbarton Transit Gap." See: https://batwgblog.com/2021/05/15/eliminating-the-dumbarton-transit-gap/The Dumbarton Rail project should be included in the RTP.

The first bridge across San Francisco Bay, circa 1910, was the Dumbarton Rail Bridge. The Legislature and MTC promised Regional Measure 2 voters in 2004 that passenger service on the Dumbarton Rail Bridge would be restored. (See, e.g., https://www.almanacnews.com/morgue/2004/2004_02_25.dumb.shtml See also: https://www.sjsu.edu/metropolitanstudies/initiatives/dumbarton-rail-corridorarchive/history.php)

The text of RM2 expressly promised voters, "New Mass Transit Options … Dumbarton bridge rail service connecting Union City and Millbrae BART stations. $135 million." But after voters passed RM2, MTC engaged in a colossal "bait and switch," diverting bridge toll revenues intended for the Dumbarton Rail project to the Warm Springs BART extension.

Regarding RTPID No. 25-T11-145, BATWG does not believe that expansion of express bus service in the Dumbarton Bridge corridor is adequate long-term alternative to providing rail passenger service. There is not a dedicated HOV lane across the Dumbarton highway bridge. As BATWG members personally have

experienced, many of those "express" buses are snarled in commute-hour traffic across the highway bridge.

"LINK 21" Is Rightfully Excluded from the RTP Transportation Project List.

BATWG is pleased that the RTP includes no "LINK 21" project. BATWG has been critical of "LINK 21": https://batwgblog.com/2023/04/15/time-to-shut-down-barts-link-21-project/

BATWG thanks MTC and ABAG for consideration of these comments.

Response O13-3

Regarding the commenter's comments on the Valley Link rail project, MTC and ABAG appreciate the detailed input regarding consistency with the San Joaquin Council of Governments' (SJCOG) 2022 RTP, applicability of MTC's Interregional Project Funding and Coordination Policy (MTC Resolution No. 4399), consideration of an express bus alternative, and the project's operating costs.

The Valley Link project scope continues to evolve as the project advances through development and seeks to reduce costs to better align with currently available funding sources while optimizing project benefits. The project descriptions included in the Draft Plan Bay Area 2050+ Transportation Project List were finalized at the beginning of 2025. The Valley Link project description included in the Draft Transportation Project List reflects the most up-to-date information available at that time, which is why it differs from the older project description included in the SJCOG 2022 RTP. MTC continues to coordinate closely with the project sponsor as project scope and cost estimates are further refined. Once updates are finalized, MTC will pursue an amendment to Plan Bay Area 2050+ to reflect revisions to the Valley Link project scope and costs. Please also refer to Response A17-3 for additional discussion of revisions to the Valley Link project scope.

Interregional Project Funding and Coordination Policy (Resolution No. 4399)

The Interregional Project Funding and Coordination Policy (MTC Resolution No. 4399) governs the use of MTC regional discretionary funds for capital projects with total project costs of $100 million or more that are beyond or cross MTC's jurisdictional boundary. Projects must meet the conditions in the policy before MTC discretionary funds may be programmed or allocated. This policy governs discretionary funding decisions; it does not determine what projects may be included in the RTP. In addition, the RTP is a planning document and does not program funding to specific projects.

Alternatives and operating costs

MTC continues to work closely with the project sponsor to minimize project costs and optimize potential benefits for Valley Link. The project has completed its environmental review, and alternatives to the rail project were considered through that process by the public and decision-makers.

Project operating costs are included as part of total project costs in the plan. However, the plan does not program funding to individual projects. As a long-range planning document, Plan Bay Area 2050+ evaluates total transportation project costs across the Transportation Project List relative to total anticipated transportation revenues over the plan's 25-year horizon, consistent with RTP fiscal constraint requirements.

BART Silicon Valley Phase II (RTPID 25-T12-180)

MTC and ABAG appreciate the commenter's continued engagement regarding the BART Silicon Valley Phase II project. Adoption of MTC's Major Project Advancement Policy (MTC Resolution No. 4537) has been an important step toward improving funding coordination and efficient delivery of major projects. MTC will update this policy as an initial implementation action once Plan Bay Area 2050+ is adopted and continues to coordinate closely with VTA on delivery of this regionally significant project.

Other Project List Comments – Dumbarton Rail and LINK21

Due largely to the impacts of the COVID-19 pandemic, significantly less transportation revenue is anticipated over the 25-year plan horizon of Plan Bay Area 2050+. As a result, several projects included in the Plan Bay Area 2050 Transportation Project List are not included in the Plan Bay Area 2050+ Transportation Project List, including Dumbarton Rail and LINK21. For Plan Bay Area 2050+, MTC worked closely with transit agency staff to reevaluate transit projects and prioritize investments that best respond to post-pandemic travel needs within updated fiscal constraints.

Plan Bay Area 2050+ includes improved bus service between the East Bay and Peninsula along the Dumbarton corridor, along with transit priority improvements on both sides of the corridor (including a new dedicated busway between Redwood City and Menlo Park). Continued project development support for the Dumbarton Rail project is also included in Plan Bay Area 2050+, and Dumbarton Rail will be considered as part of the next major regional plan update, Plan Bay Area 2060.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter O14 The WREN Group

Jones and Ralph Miller on behalf of The WREN Group
December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comment is now a part of the official record on the proposed plan.

Comment O14-1

The San Francisco Bay Area 2050+ Plan presents a timely opportunity to explore innovative, resilient, and equitable transportation solutions that can support the region's long-term mobility, sustainability, and economic goals. In alignment with the Metropolitan Transportation Commission's commitment to reducing congestion, advancing climate objectives, and improving access across the Bay Area, this proposal introduces the concept of an aerial tram system as a complementary transit mode. The following materials outline how an aerial tram could enhance regional connectivity, serve challenging corridors, and contribute to a forward-looking, multimodal transportation network for the Bay Area.

Response O14-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The attachment regarding aerial tram has been received and is included as part of the official record on the proposed plan. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

2.2.3 Individuals

Letter I1 Victor Lui

October 20, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I1-1

Hello Plan Bay Area,

1. Comprehensive Parking Reform

A very common and impactful idea in modern urban planning is to eliminate or drastically reduce parking minimums. Local laws often require new housing and commercial buildings to construct a minimum number of expensive parking spaces, even if they are near transit.

This practice is widely criticized for increasing housing costs, subsidizing driving, and making neighborhoods less walkable. While the plan focuses on building "complete streets" (for biking/walking) and focusing development near transit, it doesn't appear to have an explicit, aggressive strategy to reform or remove these local parking mandates, which are a major barrier to its own goals.

Response I1-1

The plan includes strategies to reduce reliance on personal vehicles, promote sustainable transportation options, and increase parking fees in areas targeted for housing and job growth. Further, Strategy H4 provides for reduced parking requirements for 100 percent affordable housing projects. However, the plan does not include a broader strategy to remove or reform local parking minimum requirements across jurisdictions. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I1-2

2. Regional Governance Reform

The Bay Area is famously fragmented, with 9 counties and 101 cities, plus dozens of transit agencies. "Plan Bay Area" is a plan, but it explicitly states that "cities and counties retain all local land use authority."

A "common idea" often discussed is that the region cannot solve its housing or transportation crises without more powerful and consolidated regional governance. This could mean merging transit agencies (like Caltrain, BART, and AC Transit) or giving the regional bodies (MTC/ABAG) actual authority to enforce housing production and land-use changes, rather than relying on incentives and voluntary compliance. The plan operates within the current fragmented system rather than proposing to fix it.

Response I1-2

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I1-3

3. Municipal (Public) Broadband

The plan includes a strategy to "Invest in high-speed internet in underserved lowincome communities." This is typically achieved through subsidies or public-private partnerships. A more transformative "common idea" is municipal broadband, where cities or a regional authority build and operate their own fiber-optic internet network as a public utility, similar to water or electricity. This is often advocated as a way to provide faster, cheaper, and more equitable service to all residents and businesses, treating the internet as essential public infrastructure.

Response I1-3

The commenter's recommendation is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area strategies may be refined over time based on changing conditions and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding strategies revision.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I2 Sharon Steckline

November 10, 2025

Thank you for your comments. Your interest is appreciated, and your comment is now a part of the official record on the proposed plan.

Comment I2-1

It has come to my attention that your strategy and numbers requiring intensive housing projects in the Bay Area is flawed. As a long time resident of San Rafael I am very concerned about the increasing traffic and decreasing quality of life in my area. The upcoming high density building projects are out of scope. You need to put a hold on your requirements until these flawed numbers are addressed.

Response I2-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth. The plan contains strategies that focus forecasted growth in areas served by high qualify transit, and reduce reliance on personal vehicles and promote sustainable transportation options. The Draft EIR discloses impacts related to transportation in Section 3.15, "Transportation."

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I3 Anna Mannheimer

November 10, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I3-1

The current Plan Bay Area should not be approved. If you look at the data, people are leaving California and the Bay Area in particular not moving in. The job forecasts are highly speculative and unlikely to be achieved. People want to live in lower cost areas and move out if given the chance. The Bay Area suffers from congestion, water shortages and earthquake risks that aggravated by additional population.

Concentrating more population in a seismic area is foolish. Air quality will and is currently increasing impacted. As written the current plan is a not good for our area. Please vote to reject it.

Response I3-1

This comment is related to the merits of the proposed plan and does not raise concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The Draft EIR discloses impacts related to the environmental resources referred to in the comment in Sections 3.4, "Air Quality;" 3.8, "Geology, Seismicity, and Mineral Resources;" 3.14, "Public Utilities and Facilities;" and 3.15, "Transportation."

Please refer to "Master Response 1: Regional Growth Forecast" regarding the growth forecasts for the proposed plan.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I4 Sandra Bushmaker

November 13, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I4-1

Dear MTC Commissioners:

I am a long term resident of Marin County. I am a former mayor or Sausalito. I am writing because I am very concerned about your expansive plan called Plan Bay Area 2050+. While cities are still struggling to meet your RHNA numbers from the 6th cycle, this plan is unreachable.

Response I4-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I4-2

With regard to Table 2-14 of the plan, the assumptions and data regarding population growth are preposterous and out of line with other agencies charged with population projections such as the California Department of Finance Demographic Research Unit (DRU).

You project a Bay Area population growth of 24.1%, nearly 10 times faster than the rest of Califiornia (2.5%) and almost 10 times greater than DRU.

I am requesting that you direct staff to revise the population projections to be more in line with the actual projections by those charged with such projections. Your failure to do so will result in a faulty plan from its inception resulting in huge impacts to the environment and the people of the the Bay Area.

Response I4-2

The regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology designed for RTP/SCS planning and analysis purposes. While the Department of Finance projections are an important reference point, the Plan Bay Area forecast reflects a regional economic-demographic modeling approach and is not intended to be a status quo demographic projection. Please refer to "Master Response 1: Regional Growth Forecast" for more details.

The Draft EIR discloses the Plan Bay Area growth forecast and its use in the environmental analysis, including in Table 2-14.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I5 **Robert Cox 1**

November 13, 2025

Thank you for your comments. Your interest is appreciated, and your comment is now a part of the official record on the proposed plan.

Comment I5-1

To the Members of the Metropolitan Transportation Commission,

I am writing with concern about the Draft EIR for Plan Bay Area 2050, in particular the population projections.

The California Department of Finance Demographic Research Unit (DRU), which develops the official projections of population growth in our state, estimates a 6.4% increase in the Bay Area population by 2025. However, MTC is projecting a 24.1% increase in the Bay Area population for the same period. So, MTC's estimates are 3.8x that of DRU. MTC has not justified deviating from the projections offered by DRU.

Beyond this, COVID has dramatically changed the way that people work for tech companies. I live in Mountain View. Our city's Economic Vitality report indicated that as of this year 19% of our city's office space remains vacant. There is a vacancy rate of 14% for apartments built since 2016. This is largely due to employees moving to work in remote locations outside the Bay Area. Beyond this, as artificial intelligence displaces people in low level tech jobs, tech employment in the Bay Area is declining. Mountain View has actually lost population in each of the last four years. It is likely that other cities in the Bay Area have been similarly affected.

It appears that MTC has not corrected its population projections to account for changes due to remote work and the widespread adoption of artificial intelligence. I urge MTC to reject the Draft EIR and revise its population projections so that the recommendations for Plan Bay Area 2025 are based on sound assumptions.

Thank you for considering my views.

Response I5-1

As described in "Master Response 1: Regional Growth Forecast," the regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology designed for RTP/SCS planning and analysis purposes. While Department of Finance projections are an important reference point, the Plan Bay Area forecast reflects a regional economic-demographic modeling approach and is not intended to be a status-quo demographic projection.

For Plan Bay Area 2050+, MTC and ABAG carried forward the adopted methodology while updating inputs to reflect significant post-COVID demographic and economic changes, resulting in lower long-term projections relative to the prior forecast. MTC and ABAG acknowledge that factors such as remote work patterns and evolving labor market changes, including potential AI-related impacts, remain uncertain and will continue to be monitored and considered in future updates. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I6 Robert Cox 2

November 13, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I6-1

To the Members of the Metropolitan Transportation Commission,

I am writing with concern about the Draft EIR for Plan Bay Area 2050, in particular the population projections.

The California Department of Finance Demographic Research Unit (DRU), which develops the official projections of population growth in our state, estimates a 6.4% increase in the Bay Area population by 2025. However, MTC is projecting a 24.1% increase in the Bay Area population for the same period. So, MTC's estimates are 3.8x that of DRU. MTC has not justified deviating from the projections offered by DRU.

Beyond this, COVID has dramatically changed the way that people work for tech companies. I live in Mountain View. Our city's Economic Vitality report indicated that as of this year 19% of our city's office space remains vacant. There is a vacancy rate of 14% for apartments built since 2016. This is largely due to employees moving to work in remote locations outside the Bay Area. Beyond this, as artificial intelligence displaces people in low level tech jobs, tech employment in the Bay Area is declining. Mountain View has actually lost population in each of the last four years. It is likely that other cities in the Bay Area have been similarly affected.

It appears that MTC has not corrected its population projections to account for changes due to remote work and the widespread adoption of artificial intelligence. I urge MTC to reject the Draft EIR and revise its population projections so that the recommendations for Plan Bay Area 2025 are based on sound assumptions.

Response I6-1

Please refer to "Master Response 1: Regional Growth Forecast" and Response I5-1.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I7 William R Cimino

November 18, 2025

Thank you for your comments. Your interest is appreciated, and your comment is now a part of the official record on the proposed plan.

Comment I7-1

Ladies and gentlemen,

I am completely against your draft and plan 2050. I do not think that you have adequately researched the problem. Two years is hardly enough to make such a huge investment of tax dollars.

I am completely against the post tax increases related to these supposed improvements. The government is a very inefficient vessel for planning and development, and I do not believe that your organizations which are unelected should be doing this type of planning.

I give a firm negative support to your Proposed plan.

Response I7-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" for a discussion regarding the role and authority of MTC and ABAG.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I8 Nick Waranoff 1

November 19, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I8-1

Comment: The Building Industry Association Settlement Agreement referenced in 1.7.4 2013 Settlement Agreement and Table 1-1 is illegal. It was approved in closed session without the terms being presented to the public, and at the public meeting the document was not presented as a reportable item. This was a violation of the Brown Act.

Response I8-1

Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement."

Comment I8-2

Comment: In Baseline Assumptions, it states, "Section 3.11, "Land Use, Population, and Housing" uses 2020 data consistent with the most recent population information and plan's growth forecast, as described in Section 2.0, "Project Description." This is erroneous. The official state demographer is the Dept of Finance. It has significantly lowered its projections for 2050.

Response I8-2

As described in "Master Response 1: Regional Growth Forecast," the regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology for RTP/SCS planning and environmental analysis purposes. While Department of Finance projections are an important reference point, Plan Bay Area relies on an adopted regional forecasting approach and uses 2020 baseline data as the starting point for analysis of plan conditions and future growth patterns. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment I8-3

Comment incorporated by reference

https://www.marinij.com/2025/11/09/marin-voice-plan-bay-areas-draft-report-is-built-on-false-narrative/

Response I8-3

Please refer to Responses O1-2 through O1-5.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I9 Kirk Hasson

November 21, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I9-1

I have read Susan Kirsch's article in the November 9 issue of the Marin Independent Journal, and am impressed that she makes good points.

Response I9-1

Please refer to Responses O1-2 through O1-5.

Comment I9-2

Before you embark on an expensive and disruptive plan, with environmental consequences that cannot be removed by mitigation, I join those who are asking you to please review and either change or else develop persuasive support for the growth assumptions that underly the plan. Those assumptions, as related by Ms. Kirsch, seem unrealistic to me.

Response I9-2

As described in "Master Response 1: Regional Growth Forecast," the Regional Growth Forecast used in Plan Bay Area is developed using an adopted forecasting methodology intended for RTP/SCS planning and program-level environmental analysis. The Draft EIR discloses the growth assumptions used for the proposed plan and analyzes the potential environmental impacts of accommodating that growth over the planning horizon. Please refer to "Master Response 2: EIR Mitigation Measures" regarding significant and unavoidable impact determinations in the Draft EIR. Please also refer to Responses O1-2 through O1-5 regarding responses to Ms. Kirsch's comments.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I10 Susana Stanton Acuna 1

November 28, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I10-1

Hello Commissioners,

About the population statistic critiquing: Noting that actually for 2024, the population growth was the highest in ten years for California at 1% and this contrasts all the previous comments at the first hearing; that the Plan 2050+ applied growth rates' are exaggerated and there are discrepancies with DOF projections. Would the commissioners say the recent 2024 year data may put MTC Bay Area 2050+ plan's population growth statistics that have been applied, more in line?

Thank you.

Response I10-1

As described in "Master Response 1: Regional Growth Forecast," the regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology for long-range RTP/SCS

planning and program-level environmental analysis. MTC and ABAG periodically update forecast inputs to reflect more recent demographic and economic conditions. The plan's regional growth forecast was updated during fall 2023, incorporating best data available at that time. MTC and ABAG will continue to monitor emerging population and migration trends, including recent statewide growth patterns, as part of future forecast updates. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I11 Susana Stanton Acuna 2

November 28, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I11-1

Dear Commissioners,

Wastewater treatment plants and pump stations are critical shoreline assets. Their failure during floods or sea level rise would have immediate public health and equity impacts. The Draft Plan Bay Area 2050+ should go beyond general strategies and provide:

· Asset inventory: list of all treatment plants and pump stations with location.

· Vulnerability assessment; exposure to sea level rise and storm surge at multiple scenarios.

· Resilience linkage: which projects protect which facilities, and where gaps remain.

· Transparency: visual tools so the public can see how infrastructure is safeguarded.

An asset-by-asset matrix is needed so decision-makers and the public know what exists, what hazards they face, and how resilience projects protect them.

Response I11-1

As described in the last paragraph on page 2-16 of the Draft EIR, an analysis of the potential effects of sea level rise on the Bay Area is not required under CEQA:

> While the plan has incorporated sea level rise adaptation projects as a plan component, it is important to note the effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions, as concluded by the California Supreme Court (see California Building Industry Association v. Bay Area Air Quality Management District [2015] 62 Cal.4th 369, 377 ["we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."]). Changes to the State CEQA Guidelines to reflect this decision were adopted on December 28, 2018. Accordingly, while the proposed plan contains elements that would reduce the effects of sea level rise, the EIR analysis generally does not address the impacts of existing environmental conditions on a project's future users or residents. However, when a proposed project risks exacerbating environmental hazards or conditions that already exist, the EIR analyzes the potential impact of such hazards on future residents or users.

As discussed in Chater 2, "Project Description," of the Draft EIR, the proposed plan has integrated the issue of sea level rise inundation and identifies Strategy EN1, "Adapt to Sea Level Rise," to protect shoreline communities affected by up to 4.9 feet of sea level rise inundation by identifying a series of sea level rise adaptation projects. Sea level rise adaptation is described on pages 2-15 through 2-17 of the Draft EIR, under the subheading, "Sea Level Rise Adaptation Infrastructure."

The overall sea level rise adaptation projects footprint was assumed strictly for modelling purposes and to provide estimated financial inputs for the proposed plan and are not intended to be prescriptive in either specific location or depiction. Local planning efforts would determine the appropriate adaptation measures, because MTC and ABAG do not hold land use authority over the coastline and cannot implement such measures. The environmental impact analysis in Chapter 3 of the Draft EIR includes an evaluation of the environmental impacts related to the proposed sea level rise adaptation projects. Impacts associated with sea level rise adaptation projects were analyzed in the Draft EIR according to the assumed footprint of the project. However, as discussed above, the specific location or depiction of infrastructure is not known at this time, and specific beneficial and adverse effects therefore cannot be evaluated in detail. Detailed analysis of sea level rise adaptation projects will ultimately be done when specific projects are proposed by relevant local agencies.

Please also refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan strategies revision.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I12 Kitty Moore

December 2, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I12-1

To Whom It May Concern:

These comments identify substantial deficiencies in the Plan Bay Area 2050 Plus Draft Environmental Impact Report ("Draft EIR") under the California Environmental Quality Act (CEQA). The issues below are raised now to preserve them for all purposes, including any subsequent judicial review.

Response I12-1

These introductory remarks are acknowledged for the record and will be provided to the decision makers for consideration.

Comment I12-2

1. Mismatch Between "Program EIR" Label and Level of Project Specificity

The Draft EIR describes itself as a "program EIR" and states that impacts of individual transportation, sea level rise adaptation, and land use projects are not addressed in detail, even though it includes a fiscally constrained Transportation Project List, a Resilience Project List, and mapped "land use growth footprints" for specific geographies. This shows a high level of project and growth specificity, but the environmental analysis is kept at a very general level, so the detail of the CEQA review does not match the detail of the Plan.

Response I12-2

Please refer to "Master Response 4: Program Level Document" for a discussion of the level of detail for the program level analysis prepared in the Draft EIR.

The Transportation Project List is a key component of the federally mandated RTP, identifying investments in the operations, maintenance, expansion, and optimization of the region's network of highways, bridges, local streets, transit routes, and active transportation infrastructure. The fiscally constrained Transportation Project List outlines projects and programs eligible for future federal and State funding, but it does not allocate funds to any specific project or program. Impacts associated with transportation projects include in the list were analyzed in the Draft EIR according to the assumed footprint of the project. However, the specific location or depiction of infrastructure is not known at this time, and specific beneficial and adverse effects therefore cannot be evaluated in detail. The proposed plan has integrated the issue of sea level rise inundation and identifies a strategy to protect shoreline communities affected by anticipated sea level rise through a series of adaptation projects. The adaptation projects include actions that have been identified for regularly inundated shoreline areas, but the specific details of those projects are not currently known. The proposed plan's forecasted development pattern, also referred to as the "land use growth footprint," is a result of existing zoning and other land use policies, the regional growth forecast, the proposed plan's Growth Geographies, and the proposed plan's 35 integrated strategies. However, specific land use development projects will be put forward by project sponsors at the local level and the details of those projects are likewise unknown at this time. This EIR uses the land use growth footprint and the footprints for development of sea level rise adaptation projects and transportation projects to capture impacts from the proposed plan at a programmatic level.

Comment I12-3

2. Improper Reliance on Lack of Local Police Power to Avoid Mitigation

In multiple topic areas, the Draft EIR states that identified mitigation would reduce impacts to less than significant if adopted by future local agencies, but then still concludes the impacts are significant and unavoidable because MTC/ABAG lack direct land use authority. CEQA requires the lead agency to use all of its own powers to reduce impacts where feasible, including funding decisions, approval conditions, and plan-consistency tools; the Draft EIR treats institutional limits as a blanket excuse not to fully mitigate.

Response I12-3

Please refer to "Master Response 2: Mitigation Measures" for a discussion of MTC and ABAG's land use authority and significant and unavoidable impacts.

Comment I12-4

3. Vague, Advisory, and Deferred Mitigation

Many mitigation measures are written as long lists of possible actions that implementing agencies "shall implement, where feasible and necessary," without clear, enforceable obligations or performance standards. This kind of deferred, advisory approach does not ensure that mitigation will actually occur, and does not meet CEQA's requirement for specific, enforceable mitigation measures at the time the Plan is approved.

Response I12-4

Please refer to "Master Response 2: Mitigation Measures" for a discussion of enforceable mitigation in the Draft EIR.

Comment I12-5

4. Unreasonably Narrow Alternatives Range

The Draft EIR's alternatives analysis evaluates: the proposed Plan, a "No New Highway Capacity and Transit Reinvestment" alternative that keeps the same housing, economy, and environment strategies, a "Transit-Oriented Communities Growth Focus" alternative that keeps all strategies but shifts growth within transit areas, and the No Project scenario. All build alternatives rely on the same total growth forecast and essentially the same set of strategies, and even the EIR acknowledges that Alternatives 1 and 2 result in the same number of significant and unavoidable impacts as the Plan. This range does not include any alternative that would meaningfully reduce impacts through substantially different growth patterns, hazard-avoidance, or stronger VMT and GHG reductions.

Response I12-5

Please refer to "Master Response 3: Plan Alternatives" for a discussion of the reasonable range of alternatives selected for analysis. As discussed in Section 4.3, "Alternatives Selected for Detailed Analysis," each of the alternatives is constrained by the same planning assumptions as the proposed plan; maintains the same regional growth forecasts (i.e., population, employment, households, and housing units); and maintains the same forecast of reasonably available transportation revenues. These planning assumptions are considered exogenous factors and ensure the alternatives analysis provides an "apples to apples" comparison with a proposed plan that was prepared to meet both technical and statutory requirements.

Comment I12-6

4. Inadequate Analysis of Greenhouse Gas and VMT Impacts Over the Full Planning Horizon

The Draft EIR emphasizes meeting the SB 375 2035 per-capita GHG reduction target and largely frames significance around that single metric. It provides limited, opaque discussion of emissions and VMT over the full 2020–2050 horizon, including how its long-term trajectory relates to more recent statewide climate goals and what happens under different assumptions about federal vehicle standards. This narrow, target-only framing does not give decision makers and the public a clear, transparent understanding of the Plan's climate impacts across the entire planning period.

Response I12-6

Significance criteria are based on Section 15064.4 of the State CEQA Guidelines and relevant portions of Appendix G of the CEQA Guidelines, which recommend that a lead agency considers a project's consistency with relevant, adopted plans, and discuss any inconsistencies with applicable regional plans, including plans to reduce greenhouse gas (GHG) emissions. Pages 3.6-35 and 3.6-36 of the Draft EIR explain and identify the significance criteria applicable to evaluate GHG impacts of the proposed plan. Specifically, as discussed on page 3.6-35 of the Draft EIR:

> With respect to GHG emissions, the CEQA Guidelines Section 15064.4(a) states that lead agencies "shall make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate" GHG emissions resulting from a project. The CEQA Guidelines note that an agency has the discretion to either quantify a project's GHG emissions or rely on a "qualitative analysis or performance-based standards" (Section 15064.4[a]). A lead agency may use a "model or methodology" to estimate GHG emissions and has the discretion to select the model or methodology it considers "most appropriate to enable decision makers to intelligently take into account the project's incremental contribution to climate change" (Section 15064.4[c]). The CEQA Guidelines provide that the lead agency should consider the following when determining the significance of impacts from GHG emissions on the environment (Section 15064.4[b]):

- The extent a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

Based on the State CEQA Guidelines and guidance provided by the Bay Area Air Quality Management District, and professional judgement, climate impacts associated with the proposed plan are evaluated in Impacts GHG-1 though GHG-4 in Section 3.6, "Climate Change, Greenhouse Gases, and Energy," of the Draft EIR. Impact GHG-1 in Section 3.6 evaluates whether implementation of the proposed plan through 2050 would result in a net increase in GHG emissions.

Impact GHG-2 evaluates whether implementation of the proposed plan would conflict with the GHG emissions reduction target established by California Air Resources Board (CARB) pursuant to SB 375. MTC is responsible for preparing the Regional Transportation Plan (RTP) for the San Francisco Bay Area region as required by State legislation (Government Code Section 65080 et seq.) and by federal regulation (Title 23 US Code Section 134). The Sustainable Communities and Climate Protection Act of 2008, commonly known as SB 375 (Chapter 728, Statutes of 2008), requires California's 18 metropolitan planning organizations (MPOs), including MTC, to develop a Sustainable Communities Strategy (SCS) as an element of the federally mandated RTP. The SCS demonstrates how the region will meet its GHG emissions reduction target established by the CARB through integrated land use, housing, and transportation planning. The current applicable SB 375 and CARB's GHG emissions reduction target (2035) for each MPO is summarized in Table 3.6-6 of the Draft EIR (page 3.6-22). As shown in Table 3.6-6, MTC and ABAG are required to achieve a 19% GHG emissions reduction below 2005 level by 2035. The plan meets all State and federal requirements for an RTP/SCS and is the subject of this EIR. Therefore, the SB 375 GHG emissions reduction target is an appliable significance criterion to the plan.

Impacts GHG-3 and GHG-4 evaluate whether implementation of the proposed plan would conflict with other state and local plans, policies, or regulations adopted for the purpose of reducing GHG emissions. Please refer to Section 3.6 of the Draft EIR for a detailed discussion of the climate impacts associated with the proposed plan.

Regarding different assumptions about federal vehicle standards, please refer to "Greenhouse Gas Revisions" in Chapter 3, "Revisions to the Draft EIR," for a discussion regarding the methodology for motor vehicle emissions estimates.

Comment I12-7

5. Insufficient Treatment of Sea Level Rise, Multi-Hazard Risk, and Residual Exposure

The Draft EIR highlights a $229 billion program to address approximately 4.9 feet of sea level rise and related inundation, and presents a detailed "Resilience Project List," but then largely treats those adaptation efforts as eliminating hazard risk in affected areas. The document does not adequately analyze whether, even with those projects, the Plan still focuses new or intensified development in areas likely to face flooding, groundwater rise, liquefaction, or related hazards over the life of the Plan. It also acknowledges controversies regarding consistency with shoreline adaptation planning and shoreline community vulnerability, but discusses the combined effects of sea level rise, groundwater rise, and toxics exposure on disadvantaged shoreline communities only in very general terms.

Response I12-7

The proposed plan has integrated the issue of sea level rise inundation and identifies a strategy to adapt the shoreline of the San Francisco Bay. Environment Strategy EN01, "Adapt to Sea Level Rise," was included to protect shoreline communities affected by sea level rise by identifying a series of sea level rise adaptation projects. The plan's sea level rise adaptation projects build on local and regional planning efforts, incorporating a range of actions to mitigate inundation and storm surge impacts. Sea level rise adaptation projects would include elevating roadways and rail infrastructure to maintain connectivity and installing seawalls in highly developed areas to limit erosion and flooding. The impacts from implementation of the sea level rise adaptation projects footprint are analyzed throughout Chapter 3 of the Draft EIR. As discussed in Chapter 3 of the Draft EIR, while the implementation of sea level rise projects may reduce hazard risks there would be physical impacts associated with their implementation. Mitigation measures to address impacts related to implementation of the sea level rise adaptation projects footprint are included throughout the Draft EIR. While the plan has incorporated sea level rise adaptation projects as a plan component, it is important to note the effects of the environment on a project are generally outside the scope of CEQA unless the project would exacerbate these conditions, as concluded by the California Supreme Court (see *California Building Industry Association v. Bay Area Air Quality Management District* [2015] 62 Cal.4th 369, 377 ["we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."]). Changes to the State CEQA Guidelines to reflect this decision were adopted on December 28, 2018. Accordingly, while the proposed plan contains elements that would reduce the effects of sea level rise, the Draft EIR analysis generally does not address the impacts of existing environmental conditions on a project's future users or residents. However, when a proposed project risks exacerbating environmental hazards or conditions that already exist, the EIR analyzes the potential impact of such hazards on future residents or users.

Impact GEO-3 in the Section 3.8, "Geology, Seismicity, and Mineral Resources," evaluates seismic-related ground failure, including liquefaction, lateral spreading, and subsidence. Impact HYDRO-4 in Section 3.10, "Hydrology and Water Quality," evaluates flooding issues related to drainage patterns change. Impacts related to hazards and hazardous materials are addressed in Section 3.9, "Hazards and Wildfire."

With respect to the area of controversy, the State CEQA Guidelines Section 15123 requires that an EIR identify areas of controversy that are known to the lead agency, including issues raised by other agencies and the public. Therefore, the Draft EIR summarizes the areas controversy associated with the proposed plan pursuant to CEQA requirements.

Comment I12-8

6. Deficient Growth-Inducing Impact Analysis

The Draft EIR presents the Plan as simply accommodating forecast regional growth rather than inducing growth, while at the same time designating "Growth Geographies," concentrating housing and jobs in specific priority areas, and assuming development patterns that differ from current local plans. It does not meaningfully analyze how these new designations, land use intensification, and associated infrastructure and adaptation investments may stimulate additional or accelerated development in particular locations, or shift growth into areas that otherwise would not terit.

Response I12-8

As discussed on page 2-2 of the Draft EIR, the proposed plan is designed to accommodate the region's forecasted growth in population, households, housing units, and jobs within the region and shape the

development pattern in a manner intended to reduce vehicle miles traveled (VMT) levels, as well as other environmental impacts that may occur through a more dispersed development pattern. These land use strategies, together with designated Growth Geographies, work in tandem to focus housing and job growth into existing communities that are well served by the transportation network, as well as in communities with well-resourced schools and easy access to jobs, parks, and other amenities. This approach for leveraging the plan's strategies is known as the "focused growth" approach. The proposed plan prioritizes these designated Growth Geographies to accommodate most of the regional growth forecast by applying a series of land use strategies to these select geographies to make individual parcels of land more attractive for both development and redevelopment. The proposed plan uses the Growth Geographies and land use strategies to influence the forecasted development pattern by affecting the location, use, intensity, and density of forecasted development. The intent of the proposed plan is to address expected growth in the Bay Area.

While the proposed plan directs the distribution of future growth in a manner intended to reduce regional automobile VMT and achieve the GHG emissions reduction targets required by SB 375, it is based on a regional growth forecast that reflects anticipated population and employment growth and the need to provide housing for all economic segments of the population. Please refer to "Master Response 1: Regional Growth Forecast," for more information on the regional growth forecast used in Plan Bay Area. The plan's land use and transportation strategies are designed to accommodate this growth while supporting the provision of adequate housing across all economic segments of the population and reducing per capita VMT through more compact development patterns and enhanced multimodal transportation options. Section 5.3, "Growth-Inducing Impacts," of the Draft EIR evaluates potential growth-inducing impacts related to implementation of the proposed plan. The potential growth-inducing impacts evaluated include the following:

- foster population growth and construction of housing;
- eliminate obstacles to population growth;
- foster economic growth;
- affect service levels, facility capacity, or infrastructure demand; and
- encourage or facilitate other activities that could significantly affect the environment.

Comment I12-9

7. Inadequate Cumulative Impact Methodology

The Draft EIR asserts that because it is a regional plan, its analysis inherently addresses cumulative impacts, and therefore provides only limited additional cumulative analysis for conditions beyond the nine-county Bay Area. This self-referential approach does not satisfy CEQA's requirement for an explicit cumulative analysis that explains how the Plan's incremental effects interact with other past, present, and reasonably foreseeable projects and growth scenarios, particularly in neighboring regions that are closely linked by commuting, goods movement, air basins, and habitat connectivity.

Response I12-9

CEQA allows the cumulative impact analysis to use either a list of past, present, and probable future projects, including projects outside the control of the lead agency, or a summary of projections in an adopted planning document, or a thoughtful combination of the two approaches (State CEQA Guidelines Section 15130(b)). As discussed in Section 5.4.1 of the Draft EIR, "Methodology," the proposed plan is a cumulative plan by design and therefore the Draft EIR analyzes cumulative impacts throughout Sections 3.2 through 3.15. Nevertheless, Section 5.4 of the Draft EIR, "Cumulative Impacts," examines impacts

associated with implementation of the proposed plan, plus implementation of projected development for jurisdictions adjoining the Bay Area, to assess the potential for cumulative impacts from growth extending beyond the region. The cumulative analysis presented in the Draft EIR uses a projection-based approach. The projection-based approach cumulative analysis considers impacts associated with implementation of the proposed plan and implementation of projected developed for jurisdictions adjoining the Bay Area to assess the potential for cumulative impacts from growth extending beyond the region. The jurisdictions adjoining the Bay Area considered in the cumulative impacts analysis consist of Lake County, Mendocino County, Merced County, Sacramento County, San Benito County, San Joaquin County, Santa Cruz County, Stanislaus County, and Yolo County. Please refer to Section 5.4.1, "Methodology," of the Draft EIR for a discussion of methodology of the cumulative impacts analysis.

In addition, state law, including Senate Bill (SB) 375, requires that the proposed plan identify areas within the region sufficient to house the region's projected population—including all economic segments—over the planning period (Government Code Section 65080(b)(2)) By providing housing for the projected growth, the proposed plan would not place additional pressure on surrounding regions to house Bay Area workers.

Comment I12-10

8. Insufficient Analysis of Environmental Justice, Distributional Impacts, and Displacement

Although the Draft EIR emphasizes equity and resilience, identifies "Equity Priority Communities," and acknowledges displacement and access to opportunity as major concerns, its environmental analysis treats these issues largely as high-level performance indicators rather than as concrete CEQA impacts. The document does not provide a sufficiently detailed, location-specific assessment of whether the Plan concentrates environmental burdens (such as air pollution, noise, or hazardous exposures) in already overburdened communities, or how the Plan's growth pattern and transportation investments may increase or shift displacement risk in specific neighborhoods.

Response I12-10

There are no formal requirements or procedures to evaluate potential environmental justice impacts under CEQA because environmental justice is not an impact to the natural or physical environment. The proposed plan's physical impacts associated with air pollution, noise, and hazardous exposures are discussed in Section 3.4, "Air Quality," Section 3.12, "Noise," and Section 3.9, "Hazards and Wildfire," respectively. Impacts related to displacement are discussed in Impact LU-4 in Section 3.11, "Land Use, Population, and Housing," of the Draf EIR. The analysis in the Draft EIR is programmatic, and as a result, specific details regarding the location of projects are unknown. At this program level, identifying displacement impacts in specific neighborhoods is not possible. Please refer to "Master Response 4: Program Level Document," regarding program level analysis.

Comment I12-11

9. Overbroad Use of CEQA Streamlining Without Clear Consistency Standards

The Draft EIR repeatedly promotes CEQA streamlining under SB 375, SB 226, SB 743 and related provisions, indicating that many future local projects may rely on this EIR to limit or avoid further analysis of certain impacts. However, it does not provide clear, objective criteria or maps for determining what constitutes "consistency" with the Plan for tiering purposes, nor does it clearly describe what level of additional review will occur for such projects. This creates significant uncertainty for the public and decision makers about the true environmental consequences of approving the Plan and about how much later environmental review will actually take place.

Response I12-11

The proposed plan will be the fourth RTP/SCS for the Bay Area and is a long-range plan that specifies the strategies and investments to maintain, manage, and improve the region's transportation network, including improvements to bicycle and pedestrian facilities, local streets and roads, public transit systems, and highways. The Draft EIR analyzes the potential environmental effects of adopting and implementing the plan. The Draft EIR presents a programmatic assessment of the potential impacts of the proposed plan, focusing on the entire set of projects, programs, and strategies contained in the proposed plan. Individual transportation, sea level rise adaptation, and development project impacts are not addressed in detail. The analysis in the Draft EIR does not evaluate project-specific impacts of individual projects, although it provides environmental analysis and mitigation that is intended to address the range of impacts that may be associated with individual projects. Approval of the proposed plan would not affect the independent land use authority of local jurisdictions. Rather, CEQA streamlining benefits become available to those local lead agencies in cities and counties throughout the Bay Area that carry out or approve future projects consistent with the proposed plan. The CEQA streamlining benefits are described in Section 1.9, "CEQA Streamlining Opportunities" of the Draft EIR. The streamlining mechanisms and criteria under SB 375, SB 226, and SB 743 are also described in detail in Section 1.9. As described therein each of these streamlining mechanisms have clear requirements for projects to apply streamlining. Future individual projects implemented under the proposed plan would need to show compliance with one or more of these streamlining mechanisms in order to apply streamlining benefits. Please refer to Section 1.9.1 (pages 1-19 through 1-22), Section 1.92 (pages 1-22 and 1-23), and Section1.93 (page 1-23) of the Draft EIR regarding streamlining criteria under SB 375, SB 226, and SB 743, respectively. Please also refer to "Master Response 4: Program Level Document" regarding program level analysis.

Comment I12-12

10. Inadequate Explanation of Significance Determination and Residual Impacts

The Draft EIR identifies numerous significant and unavoidable impacts but frequently provides only brief, conclusory explanations of how those findings were reached and how the Plan's incremental effects compare to No Project and other alternatives. In light of the EIR's heavy reliance on complex regional models, the lack of clear disclosure of assumptions, limitations, and sensitivity of results prevents the public from understanding or checking the basis for the significance conclusions.

Response I12-12

Each resource section in Chapter 3, "Environmental Impacts," includes an "Impact Analysis" subsection. Each impact discussion under the "Impact Analysis" subsection presents the analysis, rationale, and substantial evidence upon which the conclusion is based. Feasible mitigation measures are identified to avoid, minimize, rectify, reduce, or compensate for significant or potentially significant impacts, in accordance with the State CEQA Guidelines Section 15126.4. A significance conclusion after mitigation is also provided. Please refer to Sections 3.2 through 3.15 of the Draft EIR for detailed impact analysis discussions. Please also refer to "Master Response 3: Plan Alternatives" for a discussion of the alternatives selected for the Draft EIR and a comparison of the impacts of the proposed plan and the alternatives. With respect to the numerous significant and unavoidable impacts, please refer to "Master Response 2: EIR Mitigation Measures" regarding significant and unavoidable impact determination. Finally, while the comment addresses general dissatisfaction with the approach to identifying significant and unavoidable impacts, specific comments on individual impact areas are not provided and additional response is not possible.

Comment I12-13

11. Failure to Meaningfully Integrate Public Comment Themes Into the Analysis

The Draft EIR describes extensive public engagement, including tens of thousands of comments and targeted outreach to specific communities, and it briefly lists "areas of controversy" and "issues to be resolved." However, the technical sections do not show how those specific concerns—especially around shoreline vulnerability, displacement, transit reliability, and tolling—shaped the impact analysis, mitigation framework, or alternatives. As a result, the Draft EIR does not demonstrate that key issues raised by the public were substantively incorporated into the CEQA analysis

Response I12-13

The scoping comments received in response to the Notice of Preparation are included in Appendix B of the Draft EIR. Scoping comments relevant to each resource topic are summarized at the beginning of each resource section from Section 3.2 through Section 3.15 of the Draf EIR. The State CEQA Guidelines note that comments received during the Notice of Preparation scoping process can be helpful in "identifying the range of actions, alternatives, mitigation measures, and significant effects to be analyzed in depth in an EIR and in eliminating from detailed study issues found not to be important" (CEQA Guidelines Section 15083). Neither the State CEQA Guidelines nor Statutes require a lead agency to respond directly to comments received in response to the Notice of Preparation, but they do require that they be considered. Consistent with these requirements, the comments in response to the Notice of Preparation have been carefully reviewed and considered by MTC and ABAG in the preparation of the Draft EIR.

Comment I12-14

For all of these reasons, the Draft EIR does not provide the full, good-faith disclosure and analysis required by CEQA and should not be certified in its current form.

Response I12-14

Please refer to Responses I12-2 through I12-13. These conclusionary remarks are acknowledged for the record and will be provided to the decision makers for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I13 Laura Watanuki

December 3, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I13-1

Dear MTC and ABAG Boards,

I am submitting documentation for the State and National Resource named the Yoshiko Yamanouchi House at 1007 East 5th Avenue San Mateo, California for the Plan Bay Area 2050+ Draft Environmental Report (DEIR). The registration form for this property is attached below.

Please include the Yoshiko Yamanouchi House in the Plan Bay Area 2050 Draft EIR. We will need mitigation from the air pollution, diesel particulates, truck vibrations, and noise impacts from the cumulative traffic from Plan Bay Area 2050 +.

This comes under 3.7 Cultural Resources and 3.7.3 Impact Analysis and Impacts and Mitigation Measures in the DEIR.

The Yoshiko Yamanouchi House is also listed in the Asian American and Pacific Islanders in California 1859 - 1970 register.

It was also selected for the Best Practices Review for Cultural Significance under Criterion A and Criterion B Issue 6 January 2024. https://www.nps.gov/subjects/nationalregister/upload/BPR_Criterion-A_2024-01-09-508.pdf

Thank you for your consideration.

Attachment: National Register of Historic Places Registration Form for Yoshiko Yamanouchi House

Response I13-1
Thank you for your comment. Please refer to Response O5-8. Mitigation measures related to air quality and noise and vibration are included in Section 3.4, "Air Quality," and Section 3.12, "Noise," of the Draft EIR, respectively. The attachment has been received and is included as part of the official record on the proposed plan.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I14 Susan Hopp

December 5, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I14-1
Regarding the "Plan Bay Area 2050+ and Draft EIR" report, I, as a California citizen, am very alarmed at many of the assessments and assertions contained in this report. There is so much at stake that will impact our daily lives including the ecosystems we love and rely on, and the costs involved (both direct and indirect). Specifically, the following needs much more analysis and vetting:

Response I14-1
These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Please refer to Section 3.5, "Biological Resources," of the Draft EIR for a discussion of the biological impacts associated with implementation of the proposed plan.

Fiscal needs are generally not subject to analysis under CEQA, because they are economic effects that by themselves do not constitute a physical effect on the environment (State CEQA Guidelines Section 15382 ["[a]n economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant."]).

Comment I14-2
Population assumptions as outlined in **Table 2-1** and **Table 4-1** with a one line source: "Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025". Since population is a lynchpin for just about everything in this report, this falls way short of any serious vetting. Especially so since there are numerous reports of California's declining population. For example, the Public Policy Institute of California reported "Since 2000, California has experienced its slowest rates of growth ever recorded." See also this analysis https://medium.com/@gaetanlion/abags-bay-area-populationprojections-are-way-too-high-8ac2c861fc2e

which documents and references a detailed forecast of population directly counter to the assumptions in this DEIR. *Population assumptions and housing needs then cascade to how much land is proposed for development. This will have no doubt deleterious impact on open space and ecosystems as seen in* **Table 2-2: Land Use Growth Footprint** by County and Growth Geography Designation.

Response I14-2

As described in "Master Response 1: Regional Growth Forecast," the regional growth forecast used in Plan Bay Area is developed using an adopted regional forecasting methodology intended for RTP/SCS planning and program-level environmental analysis. The Draft EIR discloses the growth assumptions used for the proposed plan, including the population and housing projections that inform the land use growth footprint and related impact analysis. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth.

Comment I14-3

Section 4.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE, required by CEQA, needs further explanation so the public can adequately understand the impact contained in this analysis. Table 4.6 could be more easily consumed by the public if the key to symbols was stated at the beginning of the table and if the many factors were numbered. I counted (67) total variables, (35) of which are rated SU for ***"significant and unavoidable"*** for their negative impact on the respective characteristic in the proposed plan. These are items that Californians hold dear, many are baked into their love of California. A box with a checklist rating deserves extensive discussion with a lot more detail than can be represented by "SU". Honestly, a debate would be appropriate so we can get views beyond the authors of this report.

Response I14-3

Please refer to "Master Response 3: Plan Alternatives." The comment suggests that the Draft EIR's discussion of the environmentally superior alternative needs to be expanded. State CEQA Guidelines Section 15126.6(d), "Evaluation of Alternatives," states that:

> The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

Table 4-34 in Section 4.6, "Environmentally Superior Alternative," serves as a matrix that compares the environmental effects of the alternatives in relation to the proposed plan to assist in understanding the relative differences in outcomes expected to result from implementation of the alternatives. The SU (significant and unavoidable), LTS/M (less than significant with mitigation incorporated), and LTS (less than significant) impacts associated with proposed plan identified in Table 4-34 are discussed in detail in Sections 3.2 through Section 3.14 (pages 3.2-1 through 3.15-32) of the Draft EIR. The description for each alternative is provided in Section 4.3, "Alternatives Selected for Detailed Analysis." The detailed comparative discussion between the proposed plan and each of the alternatives listed in Table 4-34 is provided in Section 4.5, "Comparative Impact Analysis of Alternatives." Additional information regarding the important relative differences between the proposed plan and alternatives is provided on pages 4-74 through 4.76.

Comment I14-4

In Section 4.7.2, it states under the No Project alternative **"The No Project Alternative would accommodate 100% of the region's projected housing unit growth."** This is curious, to say the least, for obvious reasons, I believe.

Response I14-4

The commenter raises concerns regarding the Draft EIR's description of the No Project Alternative in Section 4.7.2, including the statement that the No Project Alternative would accommodate 100 percent of the region's projected housing unit growth. This statement reflects an analytical assumption based on statutory requirements for an SCS that is used for comparative purposes of the alternatives required to be analyzed under CEQA. The Draft EIR assumes the same overall regional growth in population, households, and jobs under each alternative. This approach allows the Draft EIR to compare the potential environmental consequences of different growth patterns and planning approaches (i.e., where growth is directed and how it is accommodated) using a consistent growth assumption.

Under the No Project Alternative, forecasted growth is assumed to occur consistent with adopted local general plans and zoning, without the additional regional strategies included in the proposed plan. This baseline assumption is required under the State CEQA Guidelines and supports meaningful comparison of the relative environmental effects of alternative growth distributions.

Comment I14-5

Please extend the public comment - December 18 is in the middle of the holiday season and the public is distracted by end of year responsibilities and festivities. There is too much at stake to rush this without adequate public attention. In fact, I **I suggest taking ads in local newspapers so the public is aware of what is pending.**

Response I14-5

The public review period for the Draft EIR was from October 20 through December 18, 2025. The public review period lasted 59 calendar days. Circulation of the Draft EIR met requirements under State CEQA Guidelines Section 21091(a), which states that the public review period for a Draft EIR shall be at least 45 days. MTC and ABAG also posted legal notices about the availability of the Draft EIR and associated public hearings on the proposed plan and Draft EIR in the newspapers and publications in East Bay Times, La Opinion de la Bahía (in Spanish), Marin Independent Journal, Napa Valley Register, San Francisco Examiner, San José Mercury News, San Mateo County Times, Santa Rosa Press Democrat, Sing Tao (in Chinese), and Solano County Daily Republic. Please see Section 1.2, "Draft EIR Public Review Process," of the Final EIR for details.

Comment I14-6

While this is a broad, sweeping, detailed report there needs to be an equally detailed opportunity for every community, by city, to really delve into it and discuss perhaps by section for strategies. It seems to me **cities and counties will have to attend to infrastructure needs related to the plans in the report. They should have ample public discussion because in the end the public will pay the price - whether for unintended consequences or any benefits reaped.**

Response I14-6

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer also to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," which addresses coordination with local jurisdictions and the plan's role as a guiding framework rather than a mandate.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I15 Ann Duwe

December 9, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I15-1

Dear Directors of MTC and ABAG,

Have you walked around your neighborhood lately? Have you considered what the plan you are drafting will do to that neighborhood? Before you accept the provisions of Plan Bay Area 2050+, please try to envision how explosive growth, housing mandates and environmental harms outlined in the Draft EIR will damage the beauty and character of our towns as well as the financial stability of every resident.

There are four subject areas whose assumptions and mathematics seem so untethered to observable reality that I recommend your sending the material back to staff for corrections before PBA and DEIR are brought to a vote. The four subject areas are as follows:

Response I15-1

As described in State CEQA Guidelines Section 15131, the focus of an EIR's analysis should be the physical changes caused by a project. The analysis in the Draft EIR complies with MTC and ABAG's obligation to disclose the potential environmental impacts of the proposed plan based on programmatic, regional-level assumptions and forecasts. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Responses I15-2 through I15-5 below.

Comment I15-2

1. **Population forecasts** (DEIR Table 2-14). Your plans are based on a projected population growth of 24%. California State Department of Finance estimates population growth of 6.5% during the same period. Which is closer to the truth?

Response I15-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth, including why it differs from the population projection developed by the California State Department of Finance.

Comment I15-3

2. **Housing** (Table 1.7.4 and 2013 Settlement Agreement Table 1.1) The crisis in California is cost; people most in need of housing cannot afford housing already here. State housing mandates produce new market rate housing and almost no housing within reach of low-income residents. Where are the measures for providing housing for people with no or with income from low to moderate? PBA refers to the Building Industry Association (BIA) Settlement Agreement. Are housing goals determined by BIA, by the governor's aspirations, by what measures?

Response I15-3

As described in "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+" and the housing strategies in the proposed plan, Plan Bay Area 2050+ includes strategies intended to improve housing affordability and expand housing opportunities for lower-income households, including strategies focused on preserving existing affordable housing, increasing production of deed-restricted affordable housing, and providing targeted assistance to historically underserved communities, including Equity Priority Communities.

With respect to housing goals and planning assumptions, these are not determined by the Building Industry Association (BIA) Settlement Agreement or solely by aspirational targets. As described in "Master Response 1: Regional Growth Forecast," and "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement," housing needs and related planning assumptions in Plan Bay Area are informed by the regional growth forecast, which was developed within the regulatory, legal, and policy framework of the regional plan. Federal and state law requirements (including RHNA-related planning context) and adopted regional policy priorities affect the planning assumptions that can be made for the plan; the BIA Settlement Agreement establishes requirements related to the regional growth forecasting methodology and process. It does not set housing production goals or determine plan strategies.

Comment I15-4

3. **Significant and Unavoidable environmental harm** (Table 3.34) Why is so much damage to our shared environment acceptable? If such a long list of harms can't be mitigated, perhaps the plan itself needs to be changed to avoid so much damage to finite resources such as clean air and clean water.

Response I15-4

As defined in Public Resources Code section 21002.1, the purpose of an environmental impact report is to identify the significant effects of a project on the environment, identify alternatives to the project, and describe the manner in which those significant effects can be mitigated or avoided. Public agencies are required to mitigate or avoid significant environmental effects of projects whenever it is feasible to do so. However, if economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency if the project is otherwise permissible under applicable laws and regulations.

Consistent with these requirements, the Draft EIR identifies all feasible mitigation measures to reduce environmental impacts and discloses which impacts would remain significant and unavoidable. Please refer to "Master Response 2: Mitigation Measures." The identification of significant and unavoidable impacts does not reflect a determination that such impacts are acceptable; rather, it complies with MTC and ABAG's obligation to disclose the environmental effects of the project for consideration by decision-makers.

Comment I15-5

4. **Cost of PBA and DEIR.** Outside analysts estimate costs for PBA will reach $1.5Trillion! Revenue of this magnitude seems unlikely without taxing every Bay Area resident into insolvency.

I urge you to send PBA and the DEIR back to staff for significant revisions before bringing them to a vote.

Response I15-5

The commenter raises concerns regarding the proposed plan's reliance on major future regional, state, and federal funding sources, including revenues that would require future legislative action and/or voter approval. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" for additional discussion.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I16 Nick Waranoff 2

December 10, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I16-1

Comment: MTC redistributes federal funds and prioritizes "equitable priority communities" with the key factor being race. https://mtc.ca.gov/planning/transportation/access-equity-mobility/equity-priority-communities This is patently unconstitutional on its face.

Response I16-1

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. MTC and ABAG use the EPC framework as a geography-based analytical tool in Plan Bay Area to evaluate how plan strategies and investments may affect communities across the region. Equity Priority Communities are identified using multiple demographic factors, which include race/ethnicity along with other indicators of historically underserved populations.

Plan Bay Area 2050+ is a long-range regional plan. Adoption of the plan does not allocate or redistribute federal transportation funds, approve specific projects, or establish funding awards for individual jurisdictions. Federal funds are programmed through separate regional and local processes and are not determined by adoption of the plan.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I17 Sandra Bushmaker 2

December 11, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I17-1

Dear MTC and ABAG Boards,

I submit the following comments regarding the Plan Bay Area 2050+ Draft Environmental Impact Report (DEIR).

I appreciate the regional significance of Plan Bay Area and the effort that goes into preparing the RTP/SCS and the DEIR. However, we have identified three, among many, issues that require clarification or correction to ensure the DEIR meets CEQA standards for accuracy and transparency.

Response I17-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment I17-2

1. **Growth Forecasts (DEIR Table 2-14)**

MTC's population forecast with a growth rate of 24% is significantly higher than the growth rate published by the California Department of Finance (DOF) at 6.5%. The DEIR does not clearly disclose the assumptions, data sources, or modeling methods that explain these discrepancies. We request that staff provide documentation of demographic methodologies, reconcile differences with DOF projections; and conduct analyses that reflect alternative growth scenarios.

Response I17-2

Please refer to "Master Response 1: Regional Growth Forecast" for discussion of the statutory planning purpose of the regional growth forecast, the adopted methodology and data sources used to develop the

forecast, and how Plan Bay Area's regional growth forecast relates to Department of Finance projections. Master Response 1 also addresses comments requesting additional documentation of demographic methodologies, reconciliation of forecast differences, and consideration of uncertainties affecting long-term growth trends.

Comment I17-3

2. Building Industry Association Settlement Agreement Components and Compliance Information. (Plan Bay Area Introduction, (1.7.4 "2023 Settlement Agreement") and Table 1.1

While this section acknowledges that the settlement created "ongoing obligations" for MTC and ABAG, it offers no explanation of how the settlement influences housing assumptions, fails to explain how the litigation settlement may affect local infrastructure capacity, displacement, or affordability. The omission of details about the settlement leaves local governments unable to evaluate whether PBA's assumptions reflect a legal necessity or policy preference, how it impacts the Regional Housing Need Allocation process, or how assumptions about a severe housing crisis that justify passing unfunded legislative mandates, are baked into BIA's Regional Housing Control Total.

Response I17-3

Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" for additional information on the BIA settlement agreement.

Comment I17-4

3. Alternatives to the Proposed Plan (Table 3.34: Summary Comparison of EIR Impacts)

The EIR identifies 67 impacts in the 14 categories of an EIR. Thirty-five of them (52%) are rated as "Significant and Unavoidable." Many are cushioned in the language of "if feasible," in a move that reduces regional accountability by transferring responsibility from regional planners, developing this Program EIR, to local jurisdictions, who are responsible for project-specific plans. Since there are no clear Plan Alternatives, hazards of the plan are likely to prevail, including findings like these: Climate—a net increase in greenhouse gas emissions; Hazards-- interfere with emergency evacuation plan; Housing—physically divide an established community; Public Utilities—inadequate water capacity to meet demand; and others.

Response I17-4

Please refer to Response A16-4 and "Master Response 3: Plan Alternatives" regarding plan alternatives and "Master Response 2: EIR Mitigation Measures" regarding significant and unavoidable impact determination.

Comment I17-5

In summary, I request that the MTC/ABAG Commissioners direct staff to provide corrected or supplemental information so local jurisdictions can fully understand environmental impacts and policy implications.

Thank you for your consideration.

Response I17-5

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I18 Benedetto Cico

December 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I18-1

Dear Sirs:

in the name of God, please stop, regroup, restudy all your assumptions and projections upon which you have based your 20250 Plan Bay Area.

We are not getting such an increase in population (we are lucky if we do not lose population), we are not getting so many new jobs (your plan and related taxes, fees and regulations will actually make residents and jobs move away), and surely, based on recent correction to global warming estimates, we will not suffer the related catastrophic damages.

Let local agencies and municipalities deal with their own problems, people close to the problems always find the best solutions. Central planning doesn't work, too many variables, too many moving parts, in an ever ending changing environment.

Just last week Budweiser has announced the shutting down of their Fairfield Plant: 500 workers plus all directly or indirectly related to them: are you going to revise your forecast of new jobs? What about the shutting down of the Valero refinery and their thousands of workers?

Please, be humble, accept criticism, and be a true servant to the citizens and their well being

Response I18-1

Please refer to “Master Response 1: Regional Growth Forecast” for discussion of the statutory planning purpose of Plan Bay Area’s regional growth forecast, the adopted methodology used to develop long-range population and employment projections, and how economic and demographic trends and uncertainties are considered in forecast updates. Master Response 1 also addresses comments regarding recent economic shifts and evolving conditions that may affect long-term population and job trends.

Please also refer to “Master Response 7: Regional Coordination, Partnerships, and Local Implementation” for discussion of the relationship between Plan Bay Area and local land use authority, including the role of local jurisdictions in implementation and decision-making.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I19 Jeff Wells

December 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I19-1

Concerned tax payer with robust cynicism of bureaucrat's bloated, money-wasting ideas and plans.

Response I19-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I20 Mike Bullock 1

December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I20-1

Dear Bay Area Metro (ABAG and/or MTC Members and Staff),

The DEIR does not comply with CEQA because CEQA requires the disclosure of the most important impacts of the ***Plan Bay Area 2050+***. By far, the most important impact of the ***Plan Bay Area 2050+*** is climate destabilization, because ***Plan Bay Area 2050+*** does not comply with CA's official Plan to achieve climate stabilization (which is also SB 32), which is the CARB Scoping Plan. To be clear, CA's official plan to achieve SB 32 is the CARB Scoping Plan which calls for reducing VMT by 25% with respect to 2019 levels, by 2030. You claim that ***Plan Bay Area 2050+*** with its SCS will reduce driving much less than 25%, by 2035, which is 5 years later than 2030. Therefore, the ***Plan Bay Area 2050+*** may contribute to destabilizing the Earth's climate, an environmental impact that can be briefly described as ending life forms on Earth, with the exception of microbiology. It includes destroying our habitat, resulting in starvation, mass starvation, and human extinction. The CARB was tasked with creating its Scoping Plan under AB 32. SB 32 corresponds to the work of the UN's IPCC which is also working to achieve the 2030 climate stabilization requirement of 2030. The conclusion that the ***Plan Bay Area 2050+*** does in fact contribute to destabilizing the planet's climate is that the CARB Scoping Plan says that pricing is essential but the ***Plan Bay Area 2050+*** does nothing about pricing. "Essential" means that CARB has concluded that the pricing it describes must be done or failure results. Appendices d and e make it clear that the needed pricing includes the pricing of nearly all car parking, by 2030. Parking policy is primarily a responsibility of the county and city governments. The MPO's RTP, the ***Plan Bay Area 2050+***, should be an agreement of the governments in the Bay Area to do what is needed. The ***Plan Bay Area 2050+*** does not comply with the CARB Scoping Plan because it does not include any meaningful efforts to bring about car parking pricing. Therefore it contributes to climate destabilization.

Response I20-1

The commenter raises issues regarding the proposed plans consistency with the VMT reduction goals of the California Air Resources Board's (CARB) *2022 Scoping Plan for Achieving Carbon Neutrality*. The "Scoping Plan Scenario" identified in the 2022 Scoping Plan, and used in the Draft EIR, achieves GHG emission reductions that exceed the levels expected based on existing policies (represented in the Reference Scenario), keeping California on track to achieve the 2030 SB 32 GHG reduction target and achieve net zero emissions (AB 1279) by no later than 2045. The "Scoping Plan Scenario" includes actions related to VMT reduction in "VMT per capita reduced 25 percent below 2019 levels by 2030, and 30 percent below 2019 levels by 2045" (CARB 2022). The commenter references CARB's recommendations in Appendix D, "Local Actions," and Appendix E, "Sustainable and Equitable Communities," of the 2022 Scoping Plan to implement parking pricing as a strategy to reduce VMT on the local level. The proposed plan incorporates parking pricing and management through Strategy T5, Implement Pricing Strategies to Manage Demand. In addition, Strategy EN9, Expand Transportation Demand Management Initiatives, focuses on reducing single-occupancy vehicle use and promoting alternative transportation modes, although parking pricing measures are primarily addressed under Strategy T5. Parking pricing and management programs are also included as part of Mitigation Measure TRA-2b of the Draft EIR that would be applied to mitigate VMT impacts.

Section 3.6, "Climate Change, Greenhouse Gases, and Energy," of the Draft EIR identifies that SB 375 and CARB's emissions reduction targets are the primary mechanism to achieve GHG reduction goals for cars and light trucks under AB 32 targets, which were extended by SB 32. As stated in Section 3.6, the proposed plan would reduce per capita automobile and light-duty truck CO_2 emissions by over 19 percent by 2035 as compared to the required 2005 baseline, according to the regional targets set by CARB pursuant to SB 375. Page 3.6-47 under Impact GHG-3 of the Draft EIR identifies that although MTC and ABAG have developed a set of land use and transportation strategies that exceed SB 375 goals for reducing emissions from passenger cars and light-duty trucks, CARB has identified that meeting SB 375 goals alone would not be sufficient to achieve the statewide goals under the 2022 Scoping Plan (AB 1279). Additional regulatory action that results in substantial GHG reductions throughout all sectors of the State economy and based on State-adopted regulations would likely be needed to attain such goals. While the 2022 Scoping Plan identifies a 25% VMT reduction target for the state, CARB has not updated the reduction targets for MTC (or any other MPO) to achieve that reduction. Therefore, through the proposed plan, MTC is complying with and achieving its legislatively mandated 19 percent reduction target. Because CARB has not updated its reduction targets for MTC, or any other MPO, there is no legal obligation for MTC to achieve any greater reductions than that which is legislatively mandated under SB 375.

Comment I20-2

There is no excuse for you not understanding the importance of every MPO's responsibility to helping the world avoid climate destabilization. In a famous September 11, 2011 letter to SANDAG from the CA AG, this was written in the foot note on Page 8:

Executive Order S-3-05 is an official policy of the State of California, established by a gubernatorial order in 2005, and designed to meet the environmental objective that is relevant under CEQA (climate stabilization). SANDAG thus cannot simply ignore it.

The only difference now is that S-3-05 has been replaced by SB 32 which was established as a law of California. Every MPO in the state joined the lawsuit on the side of SANDAG when SANDAG was sued by CA. Therefore, you should be aware of the need to ***avoid climate destabilization***, also known as "climate stabilization."

Response I20-2

Please refer to Response I20-1.

Comment I20-3

Every moral person and government entity has a responsibility to do their part to avoid climate destabilization. By not conforming to the CARB Scoping Plan by not doing anything to bring about priced parking, you are doing the ***Plan Bay Area 2050+*** in a way that contributes to climate destabilization. That is your legal (but nor moral) choice. However, CEQA requires that you disclose your immoral choice to the general public in the EIR. Your draft does not do this. To be moral, you should be doing everything in your power to help get all the mitigation measures in the CARB Scoping Plan implemented. Doubling transit service with respect to 2018 is something you should be requesting of CA, using as one of your best arguments that the Scoping Plan calls for that as one of its primary mitigation measures to reduce vehicle miles travelled (VMT). Besides this you should be requesting the Governor, the CA Assembly and the CA Senate to please work to implement a means based, value-priced Road Use Charge (RUC) by 2030. Again, your best argument is that such a RUC is a primary mitigation measure shown in the CARB Scoping Plan.

Response I20-3

As described in CEQA Guidelines Section 15131, an environmental impact report focuses on the physical environmental effects of a project and mitigates those impacts to the extent it is feasible to do so. This EIR complies with those requirements. Page 3.6-47 under Impact GHG-3 of the Draft EIR identifies that,

although MTC and ABAG have developed a set of land use and transportation strategies that exceed SB 375 goals for reducing emissions from passenger cars and light-duty trucks, CARB has identified that meeting SB 375 goals alone would not be sufficient to achieve the Statewide goals under the 2022 Scoping Plan (AB 1279). Additional regulatory action that results in substantial GHG reductions throughout all sectors of the State economy and based on State-adopted regulations would likely be needed to attain such goals. These are beyond the feasible reach of MTC and ABAG and local jurisdictions. While subsequent projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) would be required to apply all applicable mitigation measures to address site-specific conditions, ABAG and MTC do not have authority to require the implementing agencies to adopt the identified mitigation measures but instead serve in a supportive role to assist implementing agencies in applying these measures. Please refer to "Master Response 2: Mitigation Measures" regarding MTC and ABAG's land use authority. However, as identified on page 3.6-48 of the Draft EIR implementation of Mitigation Measures AQ-3(a) through AQ-3(d), TRA-2(a), and TRA-2(b), and other comparable measures identified by a lead agency at the project-level, would reduce impacts related to potential conflict with statewide and local GHG emissions targets. Lead agencies with authority to adopt these measures would be required to implement mitigation in the EIR as applicable to individual projects consistent with the plan (PRC Section 21081). As concluded in Impact GHG-3 of the Draft EIR, even with implementation of Mitigation Measures AQ-3(a) through AQ-3(d), TRA-2(a), and TRA-2(b), forecasted emissions would not be reduced to meet the targets of SB 32 and AB 1279 and no additional mitigation is available.

As identified in Response I20-1, the proposed plan incorporates parking pricing and management through Strategy T5, Implement Pricing Strategies to Manage Demand, and Strategy EN9, Expand Transportation Demand Management Initiatives, focuses on reducing single-occupancy vehicle use and promoting alternative transportation modes.. Additionally, parking pricing and management programs are included as Mitigation Measure TRA-2b that would be applied to mitigate VMT.

Comment I20-4

The best way to get priced parking to be widely implemented would be to use a vendor who understands how to monetize unused parking and data. Keith Jones, the of Ace Parking has told me he is willing to submit a proposal. We went over the details of how priced parking can be implemented. Mr. Jones would implement his first system, for employees, in such a way that it would lead to most employees would be happy about the change. That would cause other employers to want the system.

Here are some of the features.

1. Parking should be managed so that it earns money for those for whom the parking is built or for those who are losing money because the parking is being provided. Opening an account, for easy paying and easy deposit, would be encouraged.

2. Employees would get an "add-in" payment, if that is needed, so they break even. The data needed to computer earnings would also be collected automatically. For example, employees might be required to carry a FOB, when the go to work because earning would be proportional to the time spent at the work location. If a train system has car parking, it would be helpful to have all riders carry a FOB, which would also make it easy to automatically charge the fare, beside pay the car parking earnings. In this case, earning would be proportional to time spent on the round trip. The details would be worked out by the vendor but would need to conform to the contract.

3. All parking is shared, unless it is assigned, which happens at apartments and some work locations. "Shared" means that it is available to everyone with a license plate, so they can be billed. Opening an account that associates the license plate with an account would be encouraged, for the easy flow of

money. Assigned parking charge could be computed using time that the car is in the space and time it is not, in a way that incentivized less driving. (I have details.)

4. Parking is value priced, with the exception being on-street, when the occupancy is lower than an agreed-upon threshold, like, for example, 50%. When occupancy is below the threshold, the parking could be free.

5. Parking pricing includes congestion pricing to keep the occupancy rate from exceeding an agreed-upon value. This applies to shared parking, not assigned parking.

6. Parking is fully automated, so there is no more to do than for so-called "free" parking.

7. Data collection to support the earnings calculations is also fully automated, such as being at a work site.

8. The entire system is provided (designed, installed, and operated) by a vendor, selected in an RFP (Request for Proposal) process.

9. The best place to have the first system is at a place of employment, noting that a municipal government is an employer, and that the system should not cost the employer any money. (ACE Parking, for example, is willing to do the system at no cost. They would take a small percentage of the revenue, leaving earnings, for those for whom the parking is built.)

10. The vendor would be skilled a monetizing unused parking and monetizing data.

11. Privacy would be protected, as it should likewise be specified for a Road Use Charge.

12. The vendor would be skilled at providing solar canopies, providing charging stations, and buying and selling electricity.

Response I20-4

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The proposed plan includes strategies to maintain and optimize the Bay Area's existing transportation system, including usage-based pricing strategies intended to ease traffic, reduce vehicle miles traveled, and support climate goals. Plan Bay Area strategies may be refined over time based on changing conditions and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding strategies revision and implementation priorities.

Comment I20-5

Please redo your ***Plan Bay Area 2050+*** to conform to the CARB Scoping Plan. If you don't do that, you must then disclose the impact of essentially ignoring it. That impact is helping to destabilize the climate. Using the concept of "cumulative impact," this is destabilizing the climate.

Response I20-5

Please refer to Responses I20-1 and I20-4.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I21 Mike Bullock 2

December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I21-1

Dear Bay Area Metro (ABAG and/or MTC Members and Staff),

The DEIR does not comply with CEQA because CEQA requires the disclosure of the most important impacts of the ***Plan Bay Area 2050+*** . By far, the most important impact of the ***Plan Bay Area 2050+*** is climate destabilization, because ***Plan Bay Area 2050+*** does not comply with CA's official Plan to achieve climate stabilization (which is also SB 32), which is the CARB Scoping Plan. To be clear, CA's official plan to achieve SB 32 is the CARB Scoping Plan which calls for reducing VMT by 25% with respect to 2019 levels, by 2030. You claim that ***Plan Bay Area 2050+*** with its SCS will reduce driving much less than 25%, by 2035, which is 5 years later than 2030. Therefore, the ***Plan Bay Area 2050+*** may contribute to destabilizing the Earth's climate, an environmental impact that can be briefly described as ending life forms on Earth, with the exception of microbiology. It includes destroying our habitat, resulting in starvation, mass starvation, and human extinction. The CARB was tasked with creating its Scoping Plan under AB 32. SB 32 corresponds to the work of the UN's IPCC which is also working to achieve the 2030 climate stabilization requirement of 2030. The conclusion that the ***Plan Bay Area 2050+*** does in fact contribute to destabilizing the planet's climate is that the CARB Scoping Plan says that pricing is essential but the ***Plan Bay Area 2050+*** does nothing about pricing. "Essential" means that CARB has concluded that the pricing it describes must be done or failure results. Appendices d and e make it clear that the needed pricing includes the pricing of nearly all car parking, by 2030. Parking policy is primarily a responsibility of the county and city governments. The MPO's RTP, the ***Plan Bay Area 2050+***, should be an agreement of the governments in the Bay Area to do what is needed. The ***Plan Bay Area 2050+*** does not comply with the CARB Scoping Plan because it does not include any meaningful efforts to bring about car parking pricing. Therefore it contributes to climate destabilization.

Response I21-1

Please see Response I20-1.

Comment I21-2

There is no excuse for you not understanding the importance of every MPO's responsibility to helping the world avoid climate destabilization. In a famous September 11, 2011 letter to SANDAG from the CA AG, this was written in the foot note on Page 8:

Executive Order S-3-05 is an official policy of the State of California, established by a gubernatorial order in 2005, and designed to meet the environmental objective that is relevant under CEQA (climate stabilization). SANDAG thus cannot simply ignore it.

The only difference now is that S-3-05 has been replaced by SB 32 which was established as a law of California. Every MPO in the state joined the lawsuit on the side of SANDAG when SANDAG was sued by CA. Therefore, you should be aware of the need to ***avoid climate destabilization***, also known as "climate stabilization."

Response I21-2

Please see Response I20-2.

Comment I21-3

Every moral person and government entity has a responsibility to do their part to avoid climate destabilization. By not conforming to the CARB Scoping Plan by not doing anything to bring about priced parking, you are doing the ***Plan Bay Area 2050+*** in a way that contributes to climate destabilization. That is your legal (but nor moral) choice. However, CEQA requires that you disclose your immoral choice to the general public in the EIR. Your draft does not do this. To be moral, you should be doing everything in your power to help get all the mitigation measures in the CARB Scoping Plan implemented. Doubling transit service with respect to 2018 is something you should be requesting of CA, using as one of your best arguments that the Scoping Plan calls for that as one of its primary mitigation measures to reduce vehicle miles travelled (VMT). Besides this you should be requesting the Governor, the CA Assembly and the CA Senate to please work to implement a means based, value-priced Road Use Charge (RUC) by 2030. Again, your best argument is that such a RUC is a primary mitigation measure shown in the CARB Scoping Plan.

Response I21-3

Please see Response I20-3.

Comment I21-4

The best way to get priced parking to be widely implemented would be to use a vendor who understands how to monetize unused parking and data. Keith Jones, the CEO of Ace Parking has told me he is willing to submit a proposal. We went over the details of how priced parking can be implemented. Mr. Jones would implement his first system, for employees, in such a way that it would lead to most employees would be happy about the change. That would cause other employers to want the system.

Here are some of the features.

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- Employees would get an “add-in” payment, if that is needed, so they break even. The data needed to computer earnings would also be collected automatically. For example, employees might be required to carry a FOB, when the go to work because earning would be proportional to the time spent at the work location. If a train system has car parking, it would be helpful to have all riders carry a FOB, which would also make it easy to automatically charge the fare, beside pay the car parking earnings. In this case, earning would be proportional to time spent on the round trip. The details would be worked out by the vendor but would need to conform to the contract.

- All parking is shared, unless it is assigned, which happens at apartments and some work locations. “Shared” means that it is available to everyone with a license plate, so they can be billed. Opening an account that associates the license plate with an account would be encouraged, for the easy flow of money. Assigned parking charge could be computed using time that the car is in the space and time it is not, in a way that incentivized less driving. (I have details.)

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- Parking is fully automated, so there is no more to do than for so-called “free” parking.

- Data collection to support the earnings calculations is also fully automated, such as being at a work site.
- The entire system is provided (designed, installed, and operated) by a vendor, selected in an RFP (Request for Proposal) process.
- The best place to have the first system is at a place of employment, noting that a municipal government is an employer, and that the system should not cost the employer any money. (ACE Parking, for example, is willing to do the system at no cost. They would take a small percentage of the revenue, leaving earnings, for those for whom the parking is built.)
- The vendor would be skilled a monetizing unused parking and monetizing data.
- Privacy would be protected, as it should likewise be specified for a Road Use Charge.
- The vendor would be skilled at providing solar canopies, providing charging stations, and buying and selling electricity.

Response I21-4
Please see Response I20-4.

Comment I21-5
Please redo your ***Plan Bay Area 2050+*** to conform to the CARB Scoping Plan. If you don't do that, you must then disclose the impact of essentially ignoring it. That impact is helping to destabilize the climate. Using the concept of "cumulative impact," this is destabilizing the climate.

Response I21-5
Please see Response I20-5.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I22 Jinesse Reynolds

December 16, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I22-1
Dear Chair and Members of the MTC and ABAG Boards,

I am writing as a California resident to urge you, as the governing boards responsible for Plan Bay Area 2050+, to take a hard look at several foundational assumptions and analytical shortcomings in the Draft Environmental Impact Report. The consequences of this plan will reverberate for decades—shaping land use, housing, transportation, infrastructure costs, and the health of ecosystems that Californians depend on and value deeply.

Response I22-1
These introductory remarks and background information are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to Responses I22-2 through I22-6 below.

Comment I22-2

At the core of my concern is the **population growth assumption**, which functions as the linchpin for nearly every conclusion in the DEIR. Tables 2-1 and 4-1 rely on population projections supported only by a one-line attribution: *"Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025."* For an assumption that drives housing demand, land conversion, transportation investments, greenhouse gas modeling, and infrastructure expansion, this level of sourcing is wholly insufficient and fails to demonstrate serious vetting.

This is particularly troubling given the growing body of evidence showing **California's population growth has slowed dramatically and, in some regions, reversed**. The Public Policy Institute of California has documented that California has experienced its slowest growth rates on record since 2000. Independent demographic analyses further challenge ABAG's projections, showing them to be significantly overstated and inconsistent with current trends. When population assumptions are inflated, housing need projections follow—and those inflated projections then cascade into excessive land development proposals.

The environmental consequences of this cascade are evident in **Table 2-2: Land Use Growth Footprint by County and Growth Geography Designation**, which shows expansion into open space and environmentally sensitive lands. Once lost, these landscapes and ecosystems cannot be reclaimed. The Board should be asking whether these impacts are truly necessary—or whether they are the result of questionable upstream assumptions.

Response I22-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth. The plan's land use strategies and designated Growth Geographies work in tandem to focus future growth in existing communities that are well served by the transportation network, as well as in communities with well-resourced schools and easy access to jobs, parks, and other amenities; these strategies also discourage greenfield development and growth in environmentally sensitive lands.

Comment I22-3

Equally concerning is **Section 4.6, the Environmentally Superior Alternative**, a requirement under CEQA. Table 4.6 evaluates approximately **67 variables**, of which **35 are rated "Significant and Unavoidable."** These are not minor tradeoffs; they represent acknowledged harms to environmental and community values that define California's quality of life. Reducing these impacts to a checkbox labeled "SU" without substantive explanation does not meet the spirit—or the intent—of CEQA. These outcomes warrant far more transparent discussion, narrative analysis, and Board-level scrutiny. At a minimum, the public deserves to understand *why* such extensive inevitable harm is being accepted.

Response I22-3

Please refer to Response A16-4 and "Master Response 2: EIR Mitigation Measures" for a discussion of significant and unavoidable impact determinations in the Draft EIR.

Comment I22-4

Additionally, **Section 4.7.2** states that under the *No Project Alternative*, *"100% of the region's projected housing unit growth"* would still be accommodated. This assertion is difficult to reconcile with common sense and raises serious questions about the internal logic and credibility of the alternatives analysis. It demands clarification before the Board can responsibly rely on this document.

Response I22-4

Please refer to Response I14-4.

Comment I22-5

Finally, the **December 18 public comment deadline is unreasonable** given the scope and consequences of this plan. It falls during the holiday season, when public attention is predictably limited. Rushing review of a plan of this magnitude undermines meaningful public participation and erodes public trust. I strongly urge the Board to extend the comment period and to engage in proactive outreach—such as notices in local newspapers—so residents understand what is at stake.

Response I22-5

Please refer to Response I14-5.

Comment I22-6

Plan Bay Area 2050+ is not an abstract policy exercise. Cities and counties will be expected to implement it, fund the infrastructure it requires, and manage the unintended consequences if assumptions prove wrong. Ultimately, the public will bear the costs—financial, environmental, and social. For that reason alone, this plan demands a more transparent, cautious, and locally grounded review process, with genuine opportunities for community-level engagement.

Response I22-6

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The recommendations regarding plan implementation, transparency, and community engagement are noted. As described in "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," the proposed plan is a long-range regional policy and planning framework intended to guide future decision-making, coordination, and investment priorities. The plan does not override local land use authority and does not impose mandates on local jurisdictions.

As further described in "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," the proposed plan does not itself program or allocate funding to specific non-transportation projects or local infrastructure obligations, and implementation would occur over time through subsequent actions and funding decisions by multiple agencies.

MTC and ABAG recognize the importance of transparency and public participation in regional planning. The proposed plan was developed through multiple rounds of public and stakeholder engagement, and participation opportunities will continue as implementation actions and future plan updates proceed.

Comment I22-7

I urge you, as Board members, to pause, reassess the foundational assumptions of this DEIR, and ensure that the final plan reflects current demographic realities, sound environmental analysis, and the long-term interests of the people you serve.

Response I22-7

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast," which addresses the forecasting methodology, the purpose and use of the integrated modeling framework, and the role of technical assumptions in evaluating the proposed plan and alternatives.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I23 Mei-Ling Stefan 1

December 16, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I23-1

In reading the document **Plan Bay Area 2050+ Draft Environmental Impact Report (DEIR)**, I have become concerned with several basic issues which suggest a lack of transparency and rigor in the Plan.

Response I23-1

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment I23-2

1. 2013 Settlement Agreement with the Building Industry Association (Section 1.7.4, **Table 1-1)**

I am disturbed to learn about the settlement, and the power of the Building Industry Association (BIA) in the region. After winning two out of four lawsuits, why did MTC/ABAB choose to have a settlement with the BIA? I am struck by Agreement Paragraph 6a listed in Table 1-1, that forecasts shall have no increased in-commuters from outside the Bay Area. Is this an unrealistic constraint in forecasts, to favor BIA? At least, an alternative without this constraint should be explored even if the current situation forbids its endorsement; the public has the right to know better.

Response I23-2

Please see "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" regarding the settlement agreement with the Building Industry Association. This agreement has been in place since 2014 and has been part of prior Plan Bay Area plans.

Comment I23-3

2. Inflated growth forecast several times that of Dept of Finance (Section 2.3.2, **Table 2-14**)

For transparency, MTC should clearly disclose the data sources and modeling process used in its forecasts given in the present document. It will not do to make vague references to past documents not readily accessible by the public.

MTC's Table 2-14 forecasts the 2050 population to be nearly 9.6 million, resulting in an increase of 24% from 2020. I have followed up on several public comments on the huge discrepancy between MTC's and the Dept of Finance's forcasts, and I agree with those members of the public. As shown in my table below, the Dept of Finance's 2050 population projection is only about 8.15 million, and the increase in population is predicted to be 5% from 2020 to 2050, and 6.4% from 2025 to 2050.

County	4/1/2020 actual*	2025 projection	1/1/2025 actual*	2050 Projection	2020* to 2050	2025* to 2050
ALAMEDA	1,682,353	1,649,199	1,662,482	1,840,752		
CONTRA COSTA	1,165,927	1,151,423	1,158,225	1,359,291		
MARIN	262,321	252,074	254,550	245,637		
NAPA	138,019	135,241	136,124	142,654		
SAN FRANCISCO	873,965	838,027	842,027	854,332		
SAN MATEO	764,442	742,411	748,337	764,168		
SANTA CLARA	1,936,259	1,912,419	1,922,259	1,957,725		
SOLANO	453,491	448,528	449,839	506,056		
SONOMA	488,863	479,365	482,848	479,201		
Bay Area total	**7,765,640**	7,608,687	**7,656,691**	**8,149,816**	**5% increase**	**6.4 % increase**

Populations (estimates -actual, and projections) are from the Demographic Research Unit (DRU) of the CA Dept of Finance
https://dof.ca.gov/forecasting/demographics/
(E-4) https://dof.ca.gov/forecasting/demographics/estimates/
(P-2A) https://dof.ca.gov/forecasting/demographics/projections/

Hence there is little credibility on job growth and housing numbers as well in Table 2-14. I also note this assumption used:

> The housing unit forecast assumes no net growth in the in-commute from outside the region, consistent with State law and a legal settlement between MTC, ABAG, and the Building Industry Association. As a

Response I23-3

Please refer to "Master Response 1: Regional Growth Forecast" for discussion of the data sources, adopted methodology, and statutory planning purpose of the regional growth forecast used in Plan Bay Area, including how the forecast differs from Department of Finance population projections. Master Response 1 also addresses comments requesting clearer disclosure of demographic methodologies and reconciliation of differences between Plan Bay Area forecasts and Department of Finance projections.

Comment I23-4

3. Lack of accountability about residents' needs (Section 3.14, "Public Utilities and Facilities")

The Plan itself requires over $ 1 trillion, requiring over $ 800 B in new funding. But residents' needs extend far beyond transportation and housing: water, solid waste disposal, healthcare, schools, fire and public safety… While the DEIR touches upon some of these needs, mitigations are left as "if feasible", to shift accountability from MTC/ABAG to other agencies. (I shall send comments on the DEIR to eircomments@bayareametro.gov)

The Planners apparently did not consult cities and public utilities, but count on them – and residents - to fund new or updated infrastructure and public facilities to satisfy the Plan's demands. Many cities are already coping with budget deficits.

In the 1st paragraph of Section 3.14, p.645/874, it is stated:

> There were no comments received during the Notice of Preparation scoping process specifically addressing public utilities and facilities.

How can this be, if the public outreach was robust as claimed?

Response I23-4

The proposed plan is a long-range regional plan and includes planning-level project concepts coordinated with implementing agencies. Specific location or depiction of utilities demand is not known at this time, and specific effects therefore cannot be evaluated in detail. Section 3.13," Public Services and Recreation," and Section 3.14, "Public Utilities and Facilities," of the Draft EIR evaluate the potential

environmental impacts associated with increased demand for public services and utilities at a programmatic, regional level. Please refer to "Master Response 4: Program Level Document" regarding the type of analysis prepared in the Draft EIR. Mitigation measures are identified for all significant environmental impacts. These mitigation measures identify the potential measures that implementing agencies and project sponsors can implement for future projects where feasible. The use of "if feasible" language is appropriate for programmatic mitigation because MTC and ABAG cannot require local jurisdictions to adopt mitigation measures for future projects. Local agencies retain discretion over project-level implementation, including funding, design, and approval of mitigation measures. Refer to "Master Response 2: EIR Mitigation Measures" regarding MTC and ABAG's obligation to disclose potential impacts and identify feasible mitigation measures.

The public scoping process for the Draft EIR was conducted in accordance with CEQA Guidelines section 15082. MTC and ABAG initiated the scoping process on January 14, 2025, through issuance of the Notice of Preparation of a Draft EIR for the proposed plan. As required by CEQA, MTC and ABAG sent a copy of the Notice of Preparation to the State Clearinghouse within the Governor's Office of Land Use and Climate Innovation and to the county clerks in each of the nine Bay Area counties. The Notice of Preparation was also posted on the Plan Bay Area website (https://www.planbayarea.org) and distributed to State and federal resource agencies and to interested individuals and organizations.

A virtual scoping meeting was held on Wednesday, January 29, 2025, from 1:00 p.m. to 2:30 p.m. At this meeting, a presentation by MTC staff provided an overview of the proposed plan, the CEQA process, and key environmental issues identified in the Notice of Preparation. No oral comments were received during the meeting.

The Notice of Preparation and scoping comments received during the 30-day Notice of Preparation public review period are included in Appendix A and Appendix B of the Draft EIR, respectively.

With respect to lack of accountability, Plan Bay Area does not supersede local land use authority, and implementation occurs through actions by multiple agencies. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding local land use control.

Comment I23-5

I respectfully request that these concerns are addressed. Thank you

Response I23-5

These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I24 Paul Melmed

December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I24-1

Stop SB 79 from ever going forward.

Response I24-1
Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I25 James Holmes

December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I25-1
I share the widespread concern that the population projections in the EIR and Plan are inflated and inconsistent with Finance Department projections, especially as regards Marin County where I live.

Response I25-1
Please refer to "Master Response 1: Regional Growth Forecast" for discussion of the adopted regional growth forecast methodology used in Plan Bay Area, including how Plan Bay Area forecasts relate to Department of Finance projections and how projections are developed for regional planning and program-level environmental analysis.

Comment I25-2
The lack of evidence for the projections has been widely noted. The basis for the widely-remarked discrepancy, I believe, is that the projections are based on the authors' assumptions about how much the Bay Area *could* grow if it had the more-affordable housing that the authors' wish the plan would lead to, rather than being based on projections using current assumptions about population growth to date. But population assumptions based on plan outcomes rather than current realities are purely speculative and result-based, not data-based, or reality based. Instead, they seem like slight-of hand based on how EIR/plan authors think the plan will work out. The projections also seem unduly optimistic.

Response I25-2
Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment I25-3
The demographic projections seem not only result-oriented and lacking in supporting evidence, but also seem influenced by ideological desires for increased urbanization, as well as anti-suburban animus, and also possibly influenced by real estate interests which stand to profit from the growth contemplated by the plan. These influences should not play a part in developing the demographic projections.

Response I25-3
Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment I25-4
Also of concern is that the EIR acknowledges dozens of "significant and unavoidable impacts." Especially relevant to Marin County are potential water-shortage issues. I am concerned that these drastic impacts will be downplayed by decision makers, via a "statement of overriding considerations," by claiming that

the impacts are outweighed by the "housing crisis" which in turn is based on the inflated population projections.

Response I25-4

Please refer to "Master Response 2: EIR Mitigation Measures" regarding significant and unavoidable impacts in the Draft EIR and "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment I25-5

The draft EIR should not be certified nor the plan adopted, until assumptions and projections which are both evidence based and reliable are developed.

Thank you for considering these comments.

Response I25-5

Please refer to "Master Response 1: Regional Growth Forecast" regarding additional information and assumptions for the proposed plan's forecasted population growth.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I26 Mei-Ling Stefan 2

December 17, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I26-1

Dear MTC/ABAG Board:

I have numerous concerns with **Plan Bay Area 2050+ Draft Environmental Impact Report**. As summarized in Table ES-1 (staring on p.29/874), 67 negative environmental impacts are identified and 35 are deemed "Significant and Unavoidable" (SU) even with mitigation. **Please do not approve the EIR with a statement of overriding considerations**. Bay Area residents should not be condemned to live with so many negative environmental impacts. Planning should be done with more careful considerations of people's needs and well-being. It also seems that the Plan is made without consultation or coordination with other agencies and municipalities in the region.

Response I26-1

Please refer to Response A16-4 and "Master Response 2: Mitigation Measures" regarding significant and unavoidable impact findings in the Draft EIR. Note that, in most instances, the identified impact is mitigatable to a less-than-significant level, but mitigation is the responsibility of local agencies, so MTC cannot state, with certainty, that the mitigation measures will be adopted.

Comment I26-2

(1)Too many instances of "if feasible" and "where feasible" in proposed mitigation measures conveys the sense that the mitigations are not binding and enforceable.

Response I26-2

Please refer to "Master Response 2: EIR Mitigation Measures" regarding the use of "if feasible" language in mitigation measures.

Comment I26-3

(2) Impact AQ-2: Result in a substantial net increase in construction-related emissions (SU)

Table ES-1, 3.4 Air Quality (p.33 -)

Mitigation Measure AQ-2,

Equipment shall be zero emission or have engines that meet or exceed either EPA or CARB Tier 4 off-road emission standards, and it shall have engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS), if one is available for the equipment being used. Equipment with engines that meet Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement; therefore, a VDECS would not be required.

Comment: I think allowing the retrofit of ancient equipment to CARB Tier 3 is shortchanging residents, since Tier 4 has about 1/10 of the emissions of Tier 3.

[Tier 4 standards have been in effect since 2015, and CARB is updating to Tier 5 to further reduce ultrafine particulate matter. Even with a reduction of 30% from Tier 3, the emissions (in units of g/bhp-hr) are 3-3.5, and particulate emissions are 0.1 -0.2. These are roughly 10 times that of Tier 4 gaseous emissions of 0.44 and particulate emissions 0.01. Ref: https://ww2.arb.ca.gov/resources/documents/non-road-diesel-enginecertification-tier-chart]

Response I26-3

As described on pages 3.4-43 and 3.4-44 of the Draft EIR, equipment with engines that meet the Tier 4 Interim or Tier 4 Final emissions standards, such as retrofitted Teir 3 equipment, would minimize emissions of criteria pollutants and precursors through the use of readily available, lower-emitting diesel equipment. And impacts would be less than significant with the referenced mitigation measure imposed. No additional mitigation is required under CEQA.

While subsequent projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) would be required to apply all applicable mitigation measures to address site-specific conditions, MTC and ABAG cannot require local implementing agencies to adopt the mitigation measures identified in the Draft EIR. Local agencies retain discretion over project-level implementation, including funding, design, and approval of mitigation measures. Refer to "Master Response 2: EIR Mitigation Measures" regarding MTC and ABAG's obligation to disclose potential impacts and identify feasible mitigation measures.

Comment I26-4

In spite of MTC staff's outreach, no comments were received during the scoping process that addressed public utilities and facilities (p. 645). **3.14 Public Utilities and Facilities are my greatest concerns**. (I was not aware of the scoping process.)

Response I26-4

The public scoping process for the Draft EIR was conducted in accordance with State CEQA Guidelines section 15082. Please refer to Response I23-4 for additional information about MTC and ABAG's public outreach in accordance with CEQA and impacts related to public utilities and facilities.

Comment I26-5

The following are all "Significant and Unavoidable" even after the proposed mitigations.

(3) Table ES-1 (p 78 -)

> **Impact PUF-1:** Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects

Mitigation Measure PUF-1 assumes that there is project-level CEQA review to determine the adequacy of water and wastewater services. However, project-level CEQA reviews have been rolled back by the State Legislature and Governor Newsom in 2024.

Response I26-5

Please refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable impact findings in the Draft EIR.

Impacts related to water and wastewater services are adequately addressed and mitigated in the Draft EIR. Mitigation Measure PUF-1(a) requires consideration of the capacity of existing public service or utility infrastructure and assigns the relevant service provider or utility with the responsibility for undertaking project-level review, as necessary, to provide CEQA clearance for new facilities. Mitigation Measure PUF-1(f) ensures that construction impacts of any potential additional water and wastewater facilities would be mitigated as required by CEQA. Mitigation Measures PUF-2(a) through PUF-2(c) provide all feasible mitigation to reduce impacts related to water demand potentially exceeding supply. And Mitigation Measure PUF-3 would require lowering water demand and wastewater generation.

The level of analysis provided in the Draft EIR is appropriate for a programmatic analysis. Please also refer to "Master Response 4: Program Level Document" regarding program level analysis. CEQA does not require first-tier program EIRs to identify specific impacts from second-tier individual projects that would undergo project specific analysis. (*In re Bay-Delta* (2008) 43 Cal.4th 1143, 1169.) The measures discussed above ensure that facilities would have adequate capacity to accommodate demand, and that impacts related to construction of new facilities would be mitigated. This is the case even with recent legislative changes to CEQA. Therefore, these measures adequately address the impacts identified and the programmatic analysis provides the level of detail that is possible at this first-tier stage of review.

Comment I26-6

(4)Table ES-1

> **Impact PUF-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years

Mitigations only suggest water conservation. MTC should have consulted with regional water agencies to assess how much growth can be supported by water agencies' capital project plans. How do water agencies' projections of population growth compare with MTC's?

Table 3.14-3 (p.656) shows that some water agencies already have shortfalls in dry years, while others may experience shortfalls in dry years in the near future.

Response I26-6

The Draft EIR analyzed all Urban Water Management Plans in the plan area as part of the analysis of impacts to public utilities. See Draft EIR, 3.14-34 through 3.14-35, Method of Analysis. Urban Water Management Plans include details on anticipated regional supply and demand, and anticipated projects of water suppliers. In other words, MTC/ABAG extensively analyzed the updated projections of water suppliers' supply, demand, and infrastructure projects in order to conduct analysis of proposed plan impacts on public utilities.

Also, Table 3.14-3 of the Draft EIR shows some water agencies would experience water supply shortfall in dry years. Impacts related to water supply, including potential supply shortfalls during dry years, are addressed and mitigated in the Draft EIR. Mitigation Measure PUF-1(a) requires consideration of the capacity of existing public service or utility infrastructure and assigns the relevant service provider or utility with the responsibility for undertaking project-level review, as necessary, to provide CEQA clearance for new facilities. Mitigation Measure PUF-1(f) ensures that construction impacts of any potential additional water supply facilities would be mitigated, as required by CEQA. Mitigation Measures PUF-2(a) through PUF-2(c) would reduce impacts associated with water supply because they would require that land use, sea level rise adaptation, and transportation project sponsors coordinate with water suppliers to ensure adequate water supplies exist or comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use prior to project implementation.

As discussed in Response I26-5, the level of analysis provided in the Draft EIR is appropriate for a programmatic analysis. CEQA does not require first-tier program EIRs to identify specific sources of water for second-tier individual projects that would undergo project specific analysis. Please also refer to "Master Response 4: Program Level Document" regarding the analysis in the Draft EIR.

Comment I26-7

(5) Table ES-1

> **Impact PUF-4:** Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with federal, state, and local management and reduction statutes and regulations related to solid waste

Mitigation measures suggest more recycling. I am all for more recycling. However, too much of our residential solid waste is not really recyclable, or the recovered materials cannot compete with virgin materials for lack of sustainable policies. Recycling construction and demolition debris is very limited, and Green Waste Resource Recovery at Zanker is only such facility in the South Bay, to my knowledge.

Table 3.14-5 (p.661) details the alarming shortage of landfills for urban cores owing to MTC's projected population growth, even before 2050. Why is there no planning and cost estimates for new landfills in the Plan?

Response I26-7

Table 3.14-5 of the Draft EIR shows that five (i.e., Altamont Landfill and Resource Recovery, Vasco Road Sanitary Landfill, Redwood Landfill, USS-Poscoe Industries Waste Management Unit II, and Kirby Canyon Recycling and Disposal Facility) of the fourteen landfills active in the region have an estimated closure date on or before the year 2050. CEQA requires evaluation of solid waste generation and mitigation that would reduce solid waste generation if solid water impacts were determined to be potentially significant. Planning for new landfills is not a solid waste reduction strategy. Mitigation Measure PUF-4 identifies project- and site-specific considerations, such as landfill diversion strategies, including reusing building materials, maintaining structures where applicable, developing construction waste management plans, and using guidance from the Construction Materials Recycling Association. However, impacts related to increased generation of solid waste would remain significant and unavoidable, as discussed in the Draft EIR.

Comment I26-8

(6) The discussion on waste water treatment and storm water treatment (p.657 -660) omits an assessment of the capabilities of sewer systems in Bay Area cities.

Response I26-8

The proposed plan is a long-range regional planning document, and thus the EIR includes a program-level assessment of potential impacts related to wastewater and stormwater treatment. Please refer to "Master Response 4: Program Level Document." As a program-level EIR that addresses the entire nine-county, 101-city Bay Area region, the EIR does not address the impacts of individual sewer system capacity in detail. While the Draft EIR does discuss the wastewater treatment facilities in the region (Table 3.14-4), it is not possible to predict with certainty facilities that would have capacity to serve the projected growth in the future because MTC and ABAG do not have land use authority over the projected growth. The proposed plan includes advisory strategies for consideration by the nine counties and 101 cities in the Bay Area that would consider future development applications.

Sewer lines are considered part of wastewater treatment facilities in the Draft EIR. Specifically, wastewater treatment facilities are defined on page 3.14-3 of the Draft EIR as follows:

> *Urbanized and unincorporated areas of cities and counties throughout the Bay Area provide wastewater treatment facilities. These facilities include systems made up of pipelines, pump stations, interceptor stations and discharge stations.*

Impact PUF-3 of the Draft EIR (pages 3.14-45 through 3.14-47) evaluates impacts related to exceedance of existing wastewater facilities capacity and identifies Mitigation Measure PUF-3 to reduce impacts. Mitigation Measure PUF-3 would require that land use projects comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use to reduce wastewater generation. However, MTC and ABAG cannot require local implementing agencies to adopt mitigation measures, the impact would remain significant and unavoidable.

Comment I26-9

(7) An essential concern is, "What is MTC doing to alert regional water agencies and municipalities of Plan Bay Area 2050+, or to check if the Plan is feasible?"

Thank you for addressing my concerns.

Response I26-9

Regional water agencies were notified of the Draft EIR for the proposed plan via the public review process described in Response I14-5.

Approval of the proposed plan would not affect the independent land use authority of local jurisdictions including CEQA requirements associated with assuring adequate water supply. Rather, CEQA streamlining benefits would become available to lead agencies, including regional water agencies, that carry out or approve future projects consistent with the proposed plan. The proposed plan, if adopted, would be advisory and not binding at the local level. For this reason, cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities continue build out in the future and are responsible for coordinating with water agencies and municipalities when future projects are proposed. The Draft EIR includes Mitigation Measures PUF-2(a), PUF-2(b), and PUF-2(c), which would reduce impacts associated with water supply because they would require that future project sponsors coordinate with water suppliers to ensure adequate water supplies exist or comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use. Projects taking advantage of the CEQA streamlining provisions of SB 375 (Public Resources Code PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures identified, as applicable, to address site-specific conditions.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I27 Brian Swanson 1

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I27-1

To the Plan Bay Area 2050+ CEQA/Environmental Review Team:

I am a resident, voter, and taxpayer of the City of San Ramon and Contra Costa County, and a certified planner specializing in transportation impact analysis. Please accept this email as a formal California Environmental Quality Act (CEQA) comment on the Draft Environmental Impact Report (DEIR) for Plan Bay Area 2050+. Please include this comment in the DEIR administrative record and address it in the Final Environmental Impact Report (FEIR) response to comments.

Response I27-1

The commenter's statement of residency, professional background, and request for inclusion in the administrative record have been noted. These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment I27-2

This comment concerns the adequacy of notice and the practical accessibility of the public review process. CEQA's public review and comment requirements are not satisfied by theoretical availability alone; the process must be meaningfully accessible to the public in practice. The barriers documented below undermine any representation that the public has been provided an adequate, responsive, and well-noticed opportunity to review and comment on the Plan and its DEIR.

Response I27-2

CEQA requires an early and open process for determining the scope of issues that should be addressed in the EIR. Please refer to Response I14-5 regarding the public review process for the Notice of Preparation and Draft EIR. Throughout the review period, all Plan Bay Area 2050+ materials, including the Draft EIR and instructions for submitting comments, were posted on a designated Plan Bay Area website (https://planbayarea.org), which served as the primary source for project information.

Comment I27-3

1) Non-responsiveness from administrative channels impairs access to the CEQA process

In my experience, administrative emails and inquiries sent to info@bayareametro.gov frequently go unanswered, with no receipt/confirmation and no substantive response. When the public cannot reliably obtain basic procedural guidance (where to comment, how to access meeting materials, how to track presentations and hearings), the DEIR process becomes practically inaccessible to many members of the public.

Response I27-3

CEQA requires that agencies provide proper notice, make the Draft EIR available for public review, and allow the public an opportunity to submit written comments during the designated review period. Please refer to Response I14-5 and I27-2 regarding the public review process for the Notice of Preparation and Draft EIR. The public review period for the Draft EIR lasted 59 calendar days and closed on December 18,

2025. Circulation of the Draft EIR met requirements under CEQA Section 21091(a), which states that the public review period for a Draft EIR shall be at least 45 days.

As described in the Draft EIR, all noticing requirements were met through formal noticing, publication of the Draft EIR, and provision of multiple avenues for submitting comments. CEQA does not require lead agencies to provide individualized responses to general administrative inquiries or to maintain specific communication channels beyond the required noticing and comment procedures. Nonetheless, the concern regarding public communication and accessibility is noted and will be shared with MTC Commission and ABAG Executive Board for consideration in future outreach and engagement efforts. All comments received on the Draft EIR through email, mail, fax, online form, and verbal comments during the public hearings for the Draft EIR have been responded to as part of this Final EIR.

Comment I27-4

2) Legistar/Granicus dysfunction deprives the public of timely access to meetings/materials relevant to DEIR understanding

Timely access to committee agendas and packet materials is a prerequisite for meaningful public oversight and informed comment. However, the Granicus/Legistar alert/subscription mechanism is functionally unreliable and burdensome for comprehensive public tracking across committees.

MTC staff acknowledged in writing that "Granicus is an unsatisfactory tool" and represented that MTC was "adding [me] to the requested mailing lists," while also stating MTC is developing an "open source replacement… aim[ed] to roll out in 2026" (Email from Joey Kotfica to Brian Swanson, Nov. 24, 2025, 10:54 AM; Attachment 3, p. 2).

Nevertheless, more than two weeks later, I documented that I was still not receiving the notices and lacked clarity on which notices were "reliable" (Email from Brian Swanson to Joey Kotfica, Dec. 12, 2025, 6:08 PM; Attachment 3, p. 1). Mr. Kotfica's Dec. 15, 2025 reply confirms that the requested subscription fix had not yet been completed due to internal staffing issues (Email from Joey Kotfica to Brian Swanson, Dec. 15, 2025, 8:05 AM; Attachment 3, p. 1).

This is a documented barrier to the public's ability to track when DEIR-related or Plan-related matters are discussed, clarified, or advanced.

Response I27-4

Plan Bay Area 2050+ was developed through multiple rounds of public and stakeholder engagement and includes ongoing participation opportunities as implementation actions and future Plan updates proceed. The commenter’s concerns regarding the functionality and reliability of the Granicus/Legistar subscription and notification system are noted and will be considered as part of continued efforts to support accessible public engagement.

The attachments have been received and are included as part of the official record on the proposed plan.

Comment I27-5

3) Multiple domains and decentralized web presence create confusion and deter DEIR participation

Public-facing information is distributed across multiple domains (some no longer used), including mtc.ca.gov, abag.ca.gov, bayareametro.gov, and planbayarea.org. This fragmented structure inevitably creates confusion about which pages are authoritative, where deadlines and meeting notices are posted, and which inbox is the correct destination for DEIR comments versus general Plan comments. This is an avoidable participation barrier.

Response I27-5

Please refer to Response I14-5 and I27-2 regarding the public review process for the Notice of Preparation and Draft EIR. Both the Plan Bay Area 2050+ EIR website (https://planbayarea.org/2050/draft-environmental-impact-report-eir) and Notice of Availability for the Draft EIR (https://planbayarea.org/sites/default/files/documents/Plan_Bay_Area_2050_Plus_Draft_Environmental_Impact_Report_Notice_of_Availability.pdf) clearly outline how to comment on the Draft EIR.

Comment I27-6

4) Search discoverability failures impair the public's ability to locate current DEIR/Plan materials

On or about Dec. 15, 2025, basic web searches for "Plan Bay Area 2050+" using DuckDuckGo and Microsoft Bing returned prominent top results for the prior Plan Bay Area 2050 rather than clearly leading users to Plan Bay Area 2050+ materials (Attachments 1 and 2). In practical terms, this increases the risk that members of the public will review outdated materials or fail to find current DEIR comment instructions, undermining meaningful public review.

Response I27-6

CEQA requires that agencies provide proper notice, make the Draft EIR available for public review, and clearly identify the methods for submitting comments; it does not regulate or require control over third-party search engine indexing or ranking. Please refer to Response I14-5 and I27-2 regarding the public review process for the Notice of Preparation and Draft EIR. Procedures for public review of the Draft EIR satisfy CEQA's noticing and circulation requirements. The concern regarding public accessibility through search engines is noted and will be shared with the MTC Commission and ABAG Executive Board for consideration in future outreach and communication efforts, but it does not indicate noncompliance with CEQA's procedural requirements. The attachments have been received and are included as part of the official record on the proposed plan.

Comment I27-7

5) Insufficient plan-sponsor advance notice of county-level (CTA/CMA) engagement opportunities reduces meaningful participation

disparate third-party noticing portals—without a single consolidated plan-sponsor schedule and proactive public notice—is not a reasonable substitute for effective public notice.

In the same email chain, I documented the lack of adequate advance notice of a Contra Costa County Transportation Authority presentation during the Nov. 19, 2025 Authority Board Meeting (Email from Brian Swanson to info@planbayarea.org, Nov. 25, 2025, 10:55 PM; Attachment 4, p. 1).

Response I27-7

Please refer to Responses I14-5 and I27-2 regarding the public review process for the Draft EIR. CEQA does not require lead agencies to consolidate all partner or third-party meeting notices on a single platform. The attachment has been received and is included as part of the official record on the proposed plan.

Comment I27-8

Question Presented (CEQA public review adequacy)

Given these compounding access barriers—non-responsiveness, unreliable distribution of meeting materials, fragmented domains, search discoverability failures, and inadequate plan-sponsor notice of county-level opportunities—how can MTC/ABAG credibly assert that the DEIR review/comment process has provided an adequate, responsive, and well-noticed opportunity for meaningful public participation?

Response I27-8
CEQA requires that the lead agency provide proper notice of availability, make the Draft EIR available for public review, and offer a clear method for submitting comments during the review period. Please refer to Responses I27-2 through I27-7.

Comment I27-9
Requested FEIR Actions / Commitments

I request that the FEIR (or accompanying public participation documentation) directly address the above issues and commit to concrete corrective measures, including:

a) Confirm receipt of DEIR comments with an automatic acknowledgment/receipt and publish the process used to log, track, and respond to DEIR comments.

b) Provide a single, authoritative landing page for DEIR commenting (distinct from general Plan comments) that is prominently linked from all relevant MTC/ABAG/Plan Bay Area domains.

c) Implement an immediate fix for public distribution of MTC committee agendas and packets, including written confirmation that requested subscriptions have been effectuated (Attachment 3), and publish clear public instructions for subscribing reliably.

d) Correct search discoverability so a simple search for “Plan Bay Area 2050+” leads directly to the current Plan/DEIR materials and comment instructions (Attachments 1 and 2).

e) Publish and maintain a consolidated, continuously updated schedule of all Plan/DEIR-related engagement opportunities (including CTA/CMA presentations), with sufficient advance lead time and proactive notice (Attachment 4).

Response I27-9
Please refer to Responses I27-2 through I27-7. CEQA does not require the specific administrative or technological measures identified in the comment. CEQA requires that the lead agency provide proper notice of availability, make the Draft EIR available for public review, and offer a clear method for submitting comments during the review period. These requirements were satisfied for the Draft EIR as described in Responses I27-2 through I27-7. The attachments have been received and are included as part of the official record on the proposed plan.

Comment I28-10
Additionally, because these barriers have a suppressive effect on participation, I request that MTC/ABAG consider whether additional noticed opportunities (and/or an extension of the comment period, as appropriate) are necessary to ensure the public is not prejudiced by documented access failures.

Attachments:

Attachment 1 – “12.15.2025 220615 - DuckDuckGo Search for PlanBayArea2050plus Screenshot.jpg”
Attachment 2 – "12.15.2025 220106 - MS Bing Search for PlanBayArea2050plus Screenshot.jpg"
Attachment 3 – "12.15.2025 - EmailChainJKotificaStillwaitingtobesignedupformeetingnotices_Redacted.pdf"

Attachment 4 – "11.25.2025 - EmailtoMTCStaffAskingWhenPBA2050pluswithbepresentedatlocalCMAs_Redacted.pdf"

Response I27-10
Please refer to Responses I27-2 through I27-7. In accordance with the State CEQA Guidelines no additional noticing or outreach is required for the Draft EIR. The attachments have been received and are included as part of the official record on the proposed plan.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I28 Tomas Alan Rubin

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I28-1
To whom it may concern:

This letter contains my comments on the Draft Plan Bay Area 2025+ Plan proper (hereinafter "PBA2025+") and the Plan Bay Area 2025+ Draft Environmental Impact Report (hereinafter "PBA2025+ DEIR"). It is not possible, nor meaningful, to separate my comments on PBA2025+ from those on the PBA2025+ DEIR as virtually all comments on either apply to the other.

Do not redact, remove, or obscure my contact information, incorporating my address, e-mail address, and phone number from my header; I specifically desire that interested parties be able to easily contact me.

Response I28-1
Under CEQA, all comments submitted during the Draft EIR review period are treated as comments on the environmental analysis, and responses will be provided in the Final EIR regardless of whether the commenter frames them as pertaining to the proposed plan, the Draft EIR, or both. The request that the agency not redact or obscure personal contact information is also noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The commenter's submission, including contact information as provided, will be included in the administrative record consistent with those requirements.

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

Comment I28-2
I have been a resident of the City of Oakland in Alameda County for over 30 years. I have lived in Oakland, the City and County of San Francisco, and Mill Valley and Tiberon in Marin County for 40 of the last 51 years.

I am active in a variety of organizations that are directly involved in public sector matters that MTC is responsible for or coordinates, including:

- Vice Chair of the Alameda County Transportation Commission (hereinafter "ACTC") Independent Watchdog Committee
- Member of the Fremont Unified School District Citizens' Bond Oversight Committee
- Executive Committee of the California Association of Bond Oversight Committees

- Vice President, Alameda County Taxpayers' Association

- Member of the Board of Directors of Sustainability in Housing, Infrastructure, Finance, and Transportation (hereinafter "SHIFT"). As a Board Member and President of SHIFT's predecessor organization, 20 BILLION Reasons (to Oppose the Bay Area Housing Tax), I co-led the campaign against MTC's Regional Measure 4 (hereinafter "RM4"), including personally finding the huge understatement of the annual tax burden in the ballot measure documents that was evidently a major factor in MTC's decision to remove RM4 from the November 2024 nine-county ballot – for which I was named the Howard Jarvis Taxpayers Association 2024 Taxfighter of the Year.

For over a half-century, I have been a senior executive, auditor, consultant, and author on governmental surface transportation, finance, and many related topics, with the majority of my work for clients and employers in the Bay Area, which have included: the Metropolitan Transportation Commission (hereinafter "MTC"), the Alameda-Contra Costa Transit District (hereinafter "AC Transit"); the Golden Gate Bridge, Highway and Transportation District (hereinafter "Golden Gate"); the San Francisco Bay Area Rapid Transit District (hereinafter "BART"); the San Francisco Municipal Railway (hereinafter "MUNI"), the San Mateo County Transportation District (hereinafter "SamTrans"); the predecessor agency to the Santa Clara County Transportation Authority (hereinafter "VTA"); over 100 other Bay Area, California, United States, and international transit operating agencies, metropolitan/regional planning organizations, the California Department of Transportation (hereinafter "Caltrans") and other state transportation agencies, the Federal Transit Administration (hereinafter "FTA"), the American Public Transportation Association (hereinafter "APTA"), and various other Bay Area and national and other local government districts, including cities, counties, new and used water districts, school districts; transit industry suppliers, and transit industry bargaining units.

I have served as the chief financial officer of two of the largest transit operators in the U.S., the Southern California Rapid Transit District in greater Los Angeles and AC Transit.

I am a Certified Public Accountant, Certified Management Accountant, Certified Management Consultant, Certified Internal Auditor, Certified Government Financial Manager, and Certified in Financial Management. I am a long-time member of the American Public Transportation (nee Transit) Association (where I have served on numerous Committees, including the Associate Members Board of Governors), the Institute of Transportation Engineers, and as a member of the Executive Committee of the California Transit Association.

As an expert/expert witness, I have rendered expert reports and testified at trial and in depositions in approximately 20 legal actions in various State of California and Federal jurisdictions in California, Hawaii, and Washington State. I have also served as a percipient witness, rendered depositions, and testified in court and in depositions.

From the above and my other experience, I qualify as an expert in many of the key factors in PBA2025+ and the PBA2025+ DEIR.

Response I28-2

The commenter's description of their life, professional background, experience in the Bay Area transportation sector, and qualifications as an expert is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-3

PLAN BAY AREA 2050+ IS TOTALLY FINANCIALLY UNFEASABLE AND, THEREFORE, REQUIRES A TOTAL REDO

The following excerpts are from the Notice of Preparation for the PBA2050+ EIR[1], the former from page A-4[2] of the Appendix, the latter from page A-3[3]:

[1] 2025-0000009_Draft_EIR_for_Plan_Bay_Area_2050.pdf

[2] The same values can be found several places in PBA2050+, including page 62, and (with minor adjustments) the PBA2050+ DEIR, including pages 2-29 and 2-30.

[3] For the PBA2050+ DEIR, page 2-29; for PBA2050+, not all of the above data exists, but similar data is presented on page 59 for population and jobs and pp. 11 & 60 for households – housing units are in other sections of the DEIR but are not cited to source because that data is not subject to these current comments.

Plan Bay Area 2050+ Regional Revenues and Investments			
	Existing Revenues[1]	New Revenues[2]	Strategy Investment
Transportation Strategies	$423 billion	$89 billion	$500 billion
Housing Strategies	$161 billion	$339 billion	$500 billion
Economy Strategies	N/A	$246 billion	$246 billion
Environment Strategies	$31 billion	$188 billion	$229 billion

Note: Revenues may not sum to strategy investments due to rounding.

As for many other tables in PRA2050+ and the PBA2050+ DEIR, totals are not provided; they are $615 billion for "Existing Revenues," $862 billion for "New Revenues," and $1,475 billion for "Strategic Investment." For "Transportation Strategies," the sum of the first two columns is $512 billion, $12 billion more than sum shown; for "Environment Strategies," the sum is $10 billion less; for the grand totals (not shown), the sum is $2 billion more – the reasons for these differences are explained in the footnotes, which I omit as not significant to this discussion.

Plan Bay Area 2050+ Regional Growth Forecast			
	2020	2035	2050
Total Population	7,749,000	8,746,000	9,586,000
Total Employment	4,025,000	4,855,000	5,436,000
Total Households	2,798,000	3,312,000	3,796,000
Total Housing Units	2,785,000	3,486,000	3,996,000

If we take the 2035 "Total Population" of 8,476,000 as the average for the period of the plan, then we have the following:

Total Required "New Revenue" for PBA2050+:	$862,000,000,000
Bay Area Population during PBA2050+ Period:	8,476,000
Total Required "New Revenue" per Bay Area Resident:	$ 101,699

Other ways of presenting this value include:

- Total Annual Required "New Revenue" per Bay Area Resident: $ 4,068
- 25-Year "New Revenue" for an Average-Sized 2035 Household (2.56[4]): $260,266

[4] From table in Notice of Preparation above, total 2035 population of 8,476,000 divided by 3,312,000 households = 2.559

The "annual" calculation must be taken with a large helping of salt. Even if there was some possibility of that much new funding actually coming into being – which I strongly doubt – putting that funding program together would, best case, require multiple years. As PBA2050+ comprehends the period July 1, 2025 through June 30, 2050, the Plan period has already begun – and, not only are none of the proposed "New Revenue" programs not now in place, it is difficult to find any reference to any of them even being mentioned in Congress, the California Legislature, or any Bay Area local governments, let alone bills or ordinances actually being introduced. The reason for this is clear to anyone who is not overly invested in pretending that PBA2050+ has any relation to reality: most of them would have no chance in Hell of passage and even mention of advocacy for them could do great damage to the political careers of any elected represenative so foolish.

Therefore, for the total shown, even assuming that it is possible to generate that much "New Revenue," the funding, in total, and per person, would be strongly back-loaded, far smaller in the early years, including zero in the first few, likely growing quickly to an requirement far higher that the $4,068 simple average in the last years.

Of course, the actual shortfall is likely to be far more. As will be discussed below, the "Existing Revenues" projection is significantly overstated and MTC, and the transportation and other agencies that it does the central planning and coordinations for, have an very long and clear record of significantly underestimating expenditures.

While various portions of PBA2025+ and the PBA2050+ DEIR discuss potential new funding sources outside of the Bay Area, that doesn't change the import of the above calculations; either than much revenue has to be generated for each resident or PBA2050+ won't be completed. Given that over 58% of the total "Strategic Invesment" will come from "New Revenue" ($862 billion/$1,475 billion = 58.4%), the missed spending leading to missed "investment" is likely to be huge.

It must also be understood that a Federal, or a State, dollar of funding is really nothing more than a local dollar that is sent to Washington or Sacramento for a haircut – and then returned to the Bay Area wrapped in red tape. The political unreality is that getting State of Federal funding not only requires the Bay Area to achieve a high consensus to do so, but the entire State of California or the nation.

Response I28-3

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The analysis in the Draft EIR complies with MTC and ABAG's obligation to disclose the potential environmental impacts of the proposed plan based on programmatic, regional-level assumptions and forecasts. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" for a discussion regarding the funding issues associated with the plan.

Comment I28-4

Many "New Revenue" Sources are Extremely Unrealistic

For example, PBA2050+, page 87, has:

> EC1: Implement a Statewide Guaranteed Income. Provide an income-based monthly payment to all Bay Area households to improve family stability, promote economic mobility and increase consumer spending. $205 billion

This is clearly identified as a "Statewide" program – which means, of course, to get it approved, it would either have to be implemented by the Legislature acting alone (highly unlikely), by the Legislature placing it on the ballot for the approval of the electorate (also unlikely), or by the so-called "citizens' initiative" process for the approval of the electorate. The later is the most likely route because: (1) it would not require any elected official to actually publically vote on its actual implementation, and (2) the California Supreme Court decision in *California Cannibus Coaliton v City of Upland* (and related cases) appears to allow approval by a 50%+1 majority, vice the Proposition 13 two-thirds.

EC1 is projected with a 25-year cost of $205 billion for expenditures in the Bay Area. The population of the nine Bay Area counties was under 19.37% of the Statewide population for 2025[5], which grosses up to $1.058 trillion for the State. Adding 4% (probably low) for administration, and we're talking about a total program cost for some number of years less than 25. (The program would have to be approved and implemented, which would mean, absolutely best case, a vote in November 2026 and likely first implementation no earlier than July 1, 2027; below, MTC assumes 2030 start – which appears very optomistic.).

[5] State of California, Department of Finance, Demographic Research Unit, Table 1: E-4 Population Estimates for Counties and State 2021-2025, with 2020 Benchmark, Estimates-E1 | California Department of Finance.

Response I28-4

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area 2050+ includes certain strategies as planning-level concepts and recognizes implementation would require separate actions by responsible agencies, including potentially state-level decisions. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding funding risks for the plan.

Comment I28-5

PBA2025+ Draft Technical Assumptions, page 59:

> *Strategy EC1: Implement a Statewide Guaranteed Income (Bay Area Cost Portion)* This strategy assumes that $500 per month would go to each Bay Area household. However, as a simplifying assumption, the strategy only accounts for the cost of providing the subsidy to first income quartile households, as moderate- and higher-income households would see an increase in taxes to pay for the program that would cancel out any public cost. The assumed start year was 2030.
>
> To estimate the cost of the strategy, the forecasted number of eligible households for a given five year increment (assumed to be constant for the prior two years and following two years) was multiplied by 500 and by the number of years in the period. Annual costs were converted into year of-expenditure dollars using a 2.7% annual inflation rate between 2030 and 2035 and 2.2% thereafter. Over the course of the plan, the estimated cost of the strategy is $205 billion.

(Request for comfirmation: my reading of the above comment, coupled with my own calculations, appear to indicate that the $500/month benefit refers to the projected first year of payment will be for 2030, and that this is not expressed in current year dollars, or any other year dollars other than 2030, to be adjusted for subsequent cost-of-living increases.)

The implication of this is, if each household in the lowest quartile will begin to recieve $500/mouth ($6,000/year) in fiscal year 2030, that means that, on average, each household in the other three quartiles

will have to pay additional taxes of approximately $167/month ($2,000/year) in 2030 (both increasing with the annual rates of inflation shown above; by 2050, the monthly payment would be $792 and the average annual tax on the non-recipient households would be $3,167). The $2,000 additional tax does not include any upward adjustment for the costs of collection, program administration, or fraud, waste, and abuse and detection and prosecution thereof.

It is not explicitly stated, but I believe it is not unreasonable to believe that the the overall plan will be that the new taxes assessed on the non-lowest quartile households will income-based (or perhaps wealth-based, such as a property tax add-on). Please comment on this aspect of the intentions of the proponents of this proposal.

Speculating the likelihood of taxes of this magnitude being approved by the voters would be very iffy at this point, but I would not give it high probability. Even MTC agrees that this will be difficult, as per PBA2050+ Draft Implementation Plan Report, page 39:

> **What has changed since Plan Bay Area 2050?**
>
> **Strategy EC1:** The tighter economic climate in 2025 has decresed public support fo this strategy (existing to partial), especially among elected officials. There remains support for this stategy, but it is more mixed than previouisly.

The population for the nine Bay Area counties for 2025 totaled 7,656,691, which was 19.37% of the Statewide population of 39,529,101.

Response I28-5

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area 2050+ includes certain strategies as planning-level concepts and recognizes implementation would require separate actions by responsible agencies, including potentially state-level decisions. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding plan funding.

Comment I28-6

Like so many of the assumptions in PBA2025+, even this mixed evaluation appears to be based on MTC's continual and rarely varying very rosey outlook on how things will develop in the Bay Area. The incredible list of optomistic assumptions that MTC, once again, has adopted to drive its long term plans appear to assure that, in the real world that the rest of us are forced to occupy: (1) events will turn out much worse than planned, (2) There is insufficent process to track actual trends vs. the projections and make corrective actions, and, (3) MTC has never had a "Plan B" – actions it will take when the optomistic projections fail to occur.

California, and particularly the Bay Area, has long history of having one of the highest costs of living, and particularly State and local taxes, in the U.S. These factors, coupled with what many reagrd as excessive government regulation and control, has led to the exit of many businesses, jobs, and people – particularly young middle-class workers with families, looking to pursue the American Dream single-family home in the suburbs – a reality that is one the greatest problems facing the Bay Area.

Huge new taxes such as this, coupled with an incredible set of restrictions on housing – particularly the type of housing that entry-level homeowners actually want – can only be expected to significantly increase the rate of exit of employers, jobs, and people from the Bay Area if they are implemented.

It also appears very reasonable to speculate that this proposed $500/month benefit per household, particularly when coupled with California's existing public-financed benefits for those in need, and the other extensive general income and particularly low-income housing benefits proposed in PBA2050+,

would serve to encourage current residents to remain in the Bay Area rather than consider relocating to less expensive areas and could also encourage those not currently resident in the Bay Area to consider moving here to take advantage of these benefits. While I believe that the former outcome will not be very successful, even in the doubtful event that they are fully implemented, they will likely have at least some of the intended impact on the people departing the Bay Area (although more impact on those without good prospects that will enable them to be more successful in their new home), they may be more successful in attracting people to relocate to the Bay Area – which is already a major contributor to our local houseless numbers being so large.

Has MTC's consideration of this proposal included what impacts it could have on retaining existing and attracing new low-income beneficiaries, particularly on other sectors of government, such as education, health care, first respondors, utilities, etc.? If so, what is the quantification, in both number of beneficiaries and public sector costs, of this effect? How about the impacts of retaining high performers in the Bay Area, and attracting high-performers to relocated to the Bay Area, given the high costs of living, particularly housing and the increased taxation that is such a major component of PBA2050+ and the PBA2050+ DEIR?

Response I28-6

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area is updated on a recurring, four-year cycle, and plan implementation is intended to be adaptable over time based on funding availability, evolving conditions, and agency/program decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding implementation priorities and ongoing coordination, respectively.

Comment I28-7

Finally, given my long career as a CPA with significant experience in fraud, waste, and misuse of funds in public programs, and the incredible recent experience with multi-/multi-billion dollar losses in California's (and, currently, Minnesota's) COVID benefits, and workers' compensation program, there appears to be both huge potential for fraudulant payments under this program, plus large costs to attempt to control and detect such frauds.

Again, has MTC's consideration of this proposal included the potential, and the costs, of such frauds and fraud protections, and, if so, please quantify the financial and administrative staff impacts of monitoring this program for what appears to be well over 800,000 households (per the data in the Notice of Preparation duplicated above, the total number of projected Bay Area households in 2035 is 3,312,000; therefore, the lowest quartile would have approximately 828,000 eligible households in that year, not counting non-eligible and outright fraudulant applications that would have to be processed)?

Finally, from my own experience in working through what would be required to establish income-based fare discount programs, I can state that even these programs are very complicated and administrative work-intensive; the proposed $500/month benefit based on household income would be far more complex. Please provide information as to what sources of household income would and would not be considered in determining eligibility and what would be required in the administration and validation process. As the costs of keeping thos program reasonably secure would be signifiant, and there would be inevitably be some losses, that would mean that the taxes on the top three earning household quartiles would have to be increased to provide for the payment of the initial $500/month benefits and thereafter. Please estimate this mark-up on taxes to cover the total cost of the program.

Response I28-7

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-8

MTC HAS A TERRIBLE RECORD REGARDING THE ACCURACY OF ITS PROJECTIONS

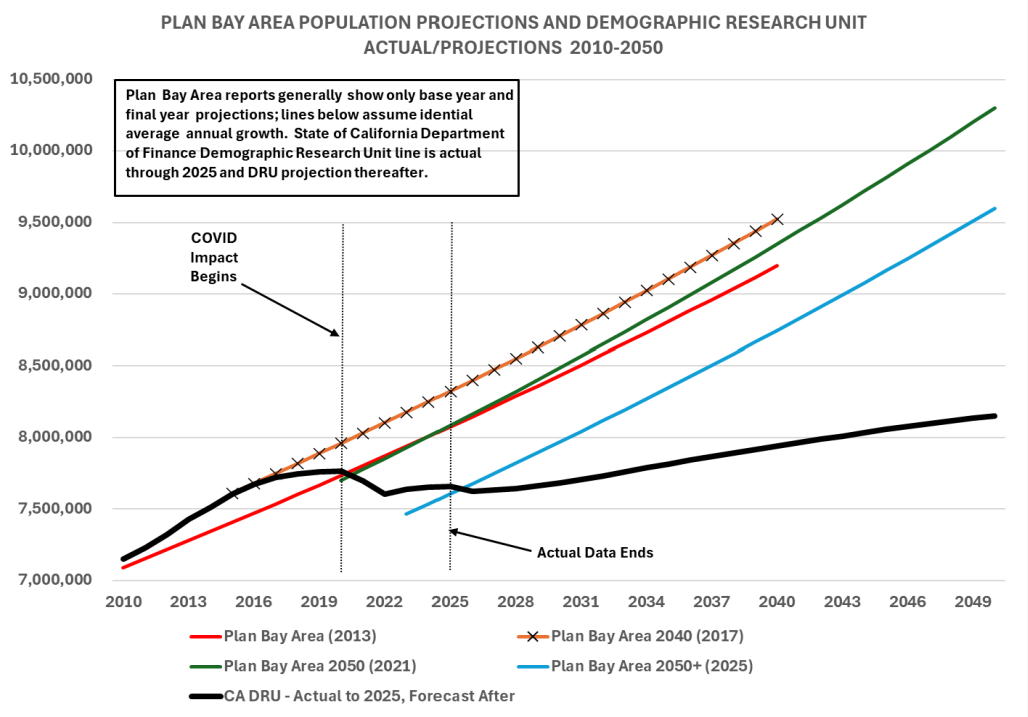
Population Projections

The following graph compares the the population projections from MTC's three previous Plan Bay Areas and the current draft:

- The original Plan Bay Area of 2013 (red line)
- Plan Bay Area 2040 of 2017 (orange line with "X's")
- Plan Bay Area 2050 of 2021 (dark green line)
- Draft Plan Bay Area 2050+ of 2025 (blue line)

The graph also shows the actual historical data (heavy black line) from the State of California Department of Finance Demographic Research Unit (hereinafter, "DRU), the official demographic agency for the State of California; actual data through 2025 and DRU's projection thereafter.

MTC has a very poor record of performance on such projections against actual results. In fairness, no one anticipated the negative impact of the COVID-19 pandemic which began early in calendar year 2020 and, in many ways, has yet to be fully resolved (indeed, there is no certainty that we will ever "return to normal").



The 2013 projection for the original Plan Bay Area actually was below actual through 2019. However, as is readily evident from the thick black DRU line, the Bay Area population began to flatten in 2016 – four years before the COVID impact began to be felt – with population growth from 2016 to 2020 less than 93,000 (1.2%) over this four-year period. The 2013 PBA projection was actually very accurate for 2020 (actual was .4% over the projection), but, as the graph above shows clearly, this was because 2020 was the year where the constant upward projection crossed the flatlining of the real world data. Looking at 2025, the 2013 PBA projection is 518,000 (4.2%) too high – and it looks like the difference will continue to increase rapidly as time goes on[6].

[6] Because the earlier versions of PBA did not provide year-by-year projections, the lines shown on the graphs are all calculated as increasing at consistent average annual rate of percentage growth to link the base year and out year values shown in the reports. I have always believed that this methodology is "conservative" (that is, makes the MTC projections look better) because, in mature areas such as the Bay Area, population growth rates generally decrease over time.

PBA2050+, Figure 3-2, "Forecasted Population Between Plan Bay Area 2050 and Plan Bay Area 2050+," page 59, actually has data for 2020, 2030, 2040, and 2050 for the two most recent PBAs, which shows that the actual projection for the intermediate years were higher than produced by my methodology; if I had adjusted to the actual MTC population projections, the error rates would have been even higher than I calculated.

I decided to use my simplified methodology to maintain consistency for the four MTA PBA population projections.

The 2017 Plan Bay Area 2040 projection was adjusted upward from the 2013 projection, starting from the higher population actual results that occurred in the period from 2010 to 2015 (the base years for the two projections). But, even by 2019, pre-COVID, the projection was 419,000 (5.1%) too high. By 2025, the 2017 projection was 667,000 (8.0%) too high – and, again, both the numerical and the percentage differences look like they will continue to increase.

The 2021 Plan Bay Area 2050 projection was shifted lower to start from the actual population for that year; it fact, it is very close to the 2013 first PBA projection, starting a bit lower but growing at a slightly higher rate in the out years. But, even by 2025, it was 426,000 (5.3%) too high – and, again, it looks like the differences will continue to increase significantly as time goes by.

PBA2050+ appears to have been developed using the same proven-faulty process as the predecessors, particularly those for 2017 and 2021, namely, the base year was adjusted to match the actuals for the start years***, but the original 2013 high growth rate – which was now well-proven as far too optomistic – was increased in each of the subsequent Plan Bay Areas***. Indeed, as the table below shows, the average annual compound populatoin growth rate for PBA2025+ was the second highest of the four.

Plan Bay Area Population Projections					
Plan	**Base Year**	**End Year**	**Base Year Population**	**End Year Population**	**Average Annual Growth Rate**
Plan Bay Area (2013)	2010	2040	7,091,000	9,196,000	.8702%
Plan Bay Area 2040 (2017)	2015	2040	7,609,000	9,522,300	.9013%
Plan Bay Area 2050 (2021)	2020	2050	7,700,000	10,300,000	.9745%
Draft Plan Bay Area 2050+ (2025)	2023	2050	7,465,000	9,586,000	.9356%

It is far past the time when MTC should abandon its cheerleader approach to long-term planning and instead adopt assumptions that are realistic and consistent with past history and valid projections of what will occur in the future.

After three consequative demonstrated failures of the MTC approach to population projection, please give us some concept of what additional proves of failure would be required to make MTC follow the rest of the world in reducing its population projections?

Response I28-8

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted regional growth, especially how the methodology was shaped by the statutory and legal requirements as well as the region's evolving planning needs. These forecasts were created based on the best available information at the time of the analysis. As demographic and economic context changes, future growth forecasts will be updated to reflect new trends.

Comment I28-9

MTC's "Existing Revenues" Projections Are Likely to Be Too High

Many of the existing revenues vary significantly with other factors that are likely overestimated in PBA2050+ and the PBA2050+ DEIR.

For example, as discussed below, MTC's population projections appear high; the impacts of this on revenue projections include:

- Sales tax revenues vary, to a significant degree, with population; even the lowest-income added residents produce taxable purchases, so overstatement of population will automatically mean that sales tax revenues will be overstated

- Similarly, most lower-income residents residents own and use automobiles and travel around the Bay Area, so overstatement of population will automatically mean that motor fuel user fees and taxes, and other transportation expenditures such as tolls and transit fares, will be overstated

- Far large the largest portion of FTA funding for transit is "formula" funding, particularly the 49 USC 5307 Urbanized Area Formula Grant Program. Two of the largest drivers of formula transit distributions to urbanized areas are population and population density. If population is overstated, then the calculation of these formula funds is also likely overstated. These are also true for other Federal programs, including the Federal Highway Administration-administered Surface Transportation Program (hereinafter, "STP") and Congestion Mitigation and Air Quality (hereinafter, "CMAQ") flexible highway formula grant programs.

The sum of the "Existing Revenues" from the above PRA2050+ citations is $615 billion. If population is overstated by, for the sake of argument, 16% in the final year of PRA2050+, and the overstatement grows proportionally over time, then the average population overstatement could be approximately 8%. If the impact on revenues is half of that, 4%, then the $615 projection of "Existing Revenues" would produce a shortfall of approximately $25 billion. How does the MTC projection of "Existing Revenues" provide for such potential – indeed, very likely – overestimation of revenues?

The above only lists a few of the "Existing Revenues" funding sources that have likelihood of being overstated.

Response I28-9

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding plan funding and evaluation of existing revenues.

Comment I28-10

Ridership Projections

Sadly, MTC's history in projecting transit ridership is far worse than its record in population projections. The following graphic was produced in the same basic way as the population projection graph. The

"actual" data is the "unlinked passenger trips" (hereinafter, "UPT") time series from the U.S. Department of Transportation/Federal Transit Administration National Transit Database, "Complete Monthly Ridership (with adjustments and estimates)," NTD Data | FTA.)

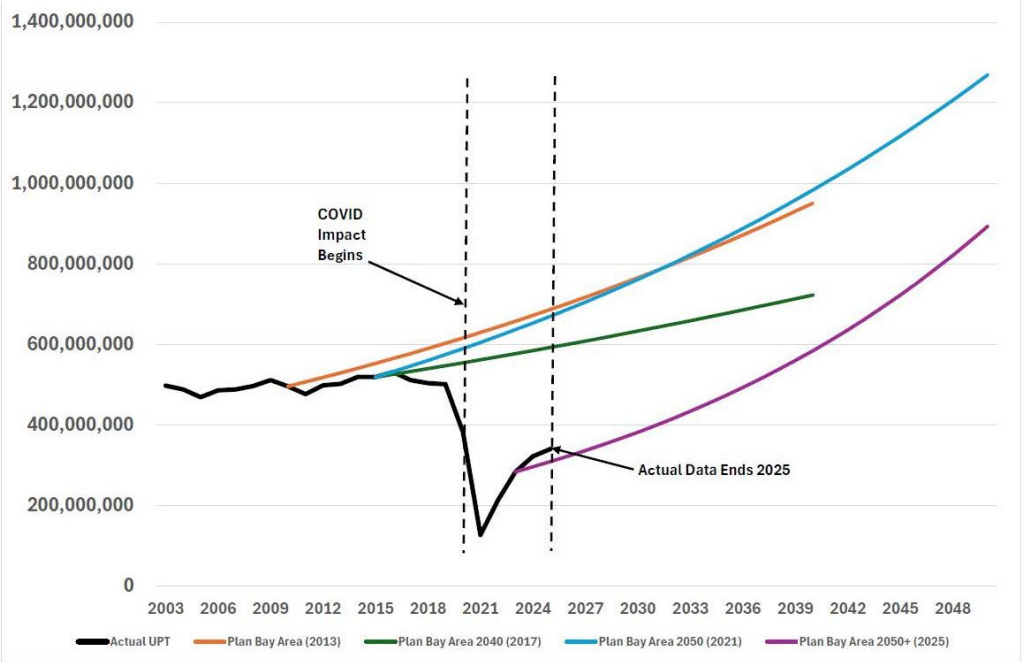
Despite massive spending, and massive spending increases, on transit since 1980, Bay Area transit ridership has been essentially flat since 1980 (all ridership data is for fiscal years ending June 30th) at approximately 500 million annually; the all-time high was approximately 586 million in the 1986 reporting year – four decades ago; we are currently half-way through the 2026 NTD reporting year – and it has been gradually trending downward since (National Transit Database). For 2019, the last pre-COVID year, ridership was 501 million – despite the Bay Area population growing 51% from 5,161,000 in 1980 to 7,786,000 in 2019 (DRU) – so UPT per capita has gone down over 30% over that period.

Actually, Bay Area transit utilization has not performed as well as this statistic would make it appear. We are counting UPT; to define by example, if a rider takes a bus from her home in Richmond to get to a BART station, then takes BART to San Francisco, and then takes MUNI Metro to get to her job, that is three UPT and one linked transit trip.

Going back over half a century, the Bay Area has been heavily investing in high-cost transit modes for longer-distance, higher-speed travel, including BART and various BART extensions, VTA light rail, Sonoma-Marin Area Rail Transit (hereinafter "SMART"), Altamont Corridor Express (hereinafter "ACE"), MUNI Metro improvements, Caltrain improvements and extension, and the origin and expansion of ferry transit services.

A transit reality is that, for high-speed transit to operate at high speed, the number of stations and stops has to be limited. As the number of stops increases, and If stops are too close together, there is a huge increase in end-to-end total travel time for acceleration and deceleration and dwell time at stations for passengers to board and deboard – and because this type of guideway transit is so expensive to construct, it can only begin to make sense in travel corridor with very high ridership, so only a limited number of these lines can be constructed. The total number of BART, light rail, commuter rail, ferry, and other guideway transit stations in the Bay Area in the low-mid hundreds; the number of bus stops is in the tens of thousands, not to mention demand-responsive pick-up and drop-off points.

Bay Area Annual Transit Unlinked Passenger Trips
Actual and Plan Bay Area Projections 2003-2050



Therefore, as the Bay Area transit decision makers focused on higher speed modes with few stops, transfers to and from these lines – particularly BART in the Bay Area – increased significantly, so the ratio of UPT to linked trips increased and, even if Bay Area UPT had remained absolutely constant, the number of people taking transit decreases.

Looking at the actual UPT from the above (black line), there were minor variations up and down from about half a billion annually, with a noticable downtrend from 532 million in 2016 to 501 million in 2019, a decline of 6%. Then, during COVID, ridership tanked to 127 million UPT in 2021 – down 75% from 2019 – and is only recovering to 322 million for 2024 and 340 million for 2025 – growing, but slowly, and stuggling to get back to even 75% of even the reduced 2019 levels of ridership.

In retrospect:

- The original Plan Bay Area (2013) projection was too high from the first year after its 2010 base year. It's 2.19% average annual compound growth rate was the second lowest of the four.

- The Plan Bay Area 2040 (2017) projection adjusted the failed 2013 projection downwards in both starting point and particularly in slope; this is clearly the most professionally responsible trend line in the PBA family of projections – but, even before the 2019 COVID UPT downturn, was obviously trending too high from its 2015 base year. The 1.35% compound growth rate was by far the lowest of these four.

- The Plan Bay Area 2050 (2021) projection, which also had a base year of 2015, adjusted the growth rate upwards from the 2017 PBA projection, which was most questionable, particularly because it was obviously well in excess of the actual trend line to the last pre-COVID year of 2019, let alone the huge decrease due to COVID in 2020 and 2021, which were well known before PBA 2050 was released. The 2.59% growth rate was the second highest.

- The PBA2050+ (2025) projection had a base year of 2023, and has the highest average rate of increase of the four. The actual ridership is actually higher than the trend line for the first two years,

but it is unclear if this could be due to what is known on Wall Street as a "dead cat bounce[7]." The average annual growth rate of 4.34% is by far the highest of the four, two-thirds higher than the number two 2021 rate.

[7] This is a bad joke referring to common occurrence of a day or two of slight unticks after a particularly strong bear market, as in, "if you drop a cat from the top of a twenty-story building, when it hits, it will bounce back up – but this should be taken as evidence of a continuing trend only with great caution."

In other words, the dead cat bounce is not due to any action of the cat to cause the increase because the cat is dead.

Transit in the Bay Area is not dead – but, it is surely suffering and it is quite questionable if it will ever fully recover.

Response I28-10

The commenter's statements are noted. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. It is important to note that the transit ridership forecasts in the regional long-range plan are not simple extrapolations of past unlinked passenger trip (UPT) trends. Rather, they are derived from the region's travel demand model, which forecasts transit use based on reasonably anticipated changes in population, employment, land use patterns, and the suite of strategies and investments in the plan. These include strategies to focus growth in transit-served areas, pricing and demand-management policies, and substantial investments in improving the frequency, speed, reliability, and connectivity of existing transit services. The forecasts therefore reflect the modeled traveler responses to a coordinated package of land use and transportation strategies, not a continuation of historic trends.

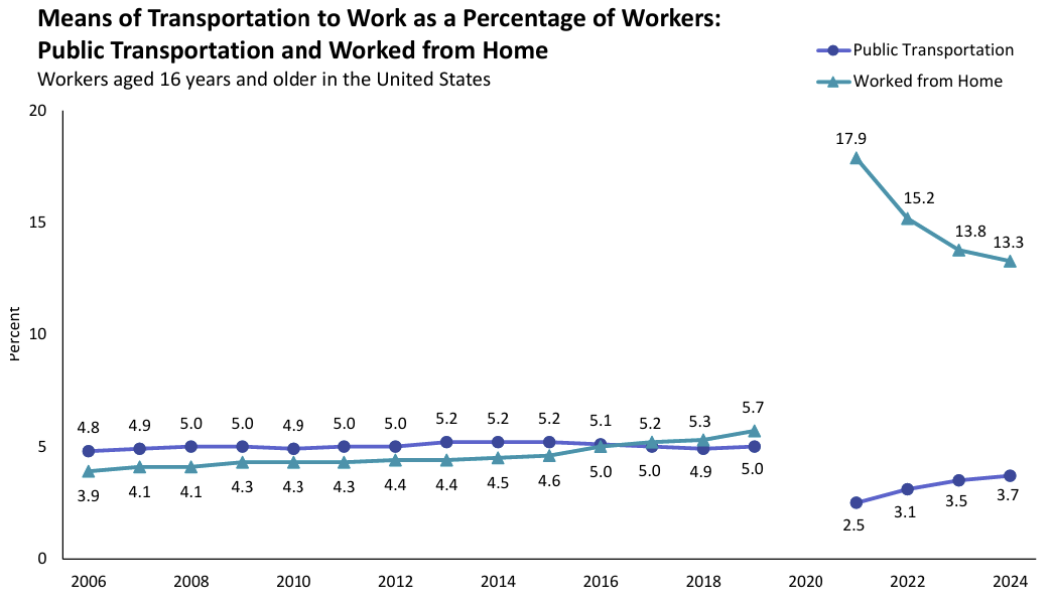
CEQA requires MTC and ABAG to analyze the impacts of the proposed plan on the existing environment. For this analysis, MTC and ABAG used 2023 as the baseline for transit ridership because that was the most recent year for which comprehensive land use, demographic, transit ridership, and traffic volumes are available for the Bay Area region. For the purposes of establishing the existing environmental setting, it is reasonable to assume that transit ridership will continue as established by patterns shown in the most recently available data. MTC and ABAG need not speculate about unforeseen patterns in transit ridership, or about transit ridership data that is not based on complete information. Please also see Draft EIR, Chapter 3.15, "Transportation," for more on analysis of transit ridership in the plan area. Please also see Response I28-11 below for more information on MTC and ABAG's analysis of transit ridership.

Comment I28-11

Impacts of COVID on Remote Work and Other Factors Impacting Transit Utilization

Right now, there is great uncertainty in Bay Area transit circles when – and if – transit ridership will recover to the pre-COVID 2019 level. Growth to 315% of 2023 ridership, 284 million to 893 million/year, by 2050 – almost 40% higher than the 500 million a year plateau that existed, with only relatively minor variation – from 1980 to 2019 appears quite questionable.

The big question – which can only be resolved by the passage of time – is how much will the impacts of COVID and related factors have on long-term travel factors. The following graphic is from the U.S. Census Bureau American Community Survey[8]:



(The two missing data points in these time series are due to the low response rates in 2020.)

Public transit utilization took a big hit from COVID; the 2.5% reported for 2021 being half of the 5.0% reported for 2019 – from the UPT time series, 2020 modal split would have had to be far below the reported 2.5%[9] for the following year.

At the same time, worked from home (or "remote work") had a huge jump. After slow but steady increases – from 3.9% in 2006 to 5.7% in 2019, adding 1.6% over 13 years, increasing the modal split percentage almost 50% – the 17.9% reported for 2021 more than trippled in two years – and 2020 was almost certainly higher than 2021. While there has been a downward trend since, it is approaching leveling – and many experts expect that it will be then begin increasing again.

The reasons for this are many, with strong reasons for both workers and employers to favor it for many:

- Employees can avoid the time and expense of commuting; can – in some cases – be located in entirely different areas; can be home to care for children, the elderly, and the ill; can – to some extent – set their own hours, including interruptioins the all-work eight hours/day period to handle other matters, and can avoid inter-office politics and interpersonal conflicts

- Employers can avoid the huge costs of housing employees and can attract/retain highly qualified workers that would otherwise be unavailable to them; in some cases, employers have noted increased productivity and improved product development

The impacts of remote work have been considerably larger in the Bay Area than the rest of the nation. More tech work means more jobs that are almost designed for remote work and the costs of Bay Area office space is among the highest in the U.S. San Francisco has the highest office vacancy rate in the U.S., exceeding 35%.

While there has been a return-to-office movement by some major employers, with some solid rationales (need for team-building, issues with managing/leading remote workers), some of this appears driven by titans of industry that made huge investments in their trophy headquarters buildings and wanted to avoid criticism that these palaces were empty.

The only real questions are how much higher remote work will be over the pre-COVID world – and where it will trend over the long term as, for example, remote work tools continue to develop and be improved, as Zoom, Microsoft Team, etc. have improved over the past few years, and as job design changes to make remote work more viable.

Notably, Bay Area automotive travel has essentially recovered fully from the COVID period even as transit usage has remained low, which leads to a hypothesis that more remote workers come from transit than drive-alone. Given that, during this period, transit service provided was reducted and various transit influences such as security, safety, and cleanliness concerns, it appears that some former than worker that were forced to drive to work during COVID decided to continue to drive rather than going back to transit.

Many in the Bay Area transit community are asking the question, how long will it take for transit ridership to return to pre-COVID levels? MTC – which is projecting 2050 transit ridership at 178% of pre-COVID 2019 levels and 315% of 2023 levels – has evidently answered this question to its own satisfaction.

However, along with the "low long" will it take question, another question that should be asked is, "will it ever" recover to those levels?

And, even if this is possible – which I submit is far from proven – is it worthwhile to do it, is it even possible to try, can it be afforded, and are there better alternatives?

I do not see MTC even admitting that these concerns exist, let alone attempting to respond to them.

[8] Key_Indicators_Data_08192025.xlsx

[9] For many years, transit statisticians have noted a discontinuity in the time lines for the UPT data reported by FTA NTD and the transit modal split data reported by the Census bureau. If we start with the UPT data reported, the trend line is stable to down over the last few decades, while the transit modal split is very stable. Given the population increase over this period, and the increase in transfers due to the shift to more long-haul service with fewer stops discussed previously, one would expect a downward trend in modal split over time.

This difference has not been resolved. One thesis is that UPT is "revealed" data – that is, the actual number of passengers is counted – while the modal split is "stated:" the traveler states their usage on a survey. There is professional literature on a segment of revealed preference survey responders selecting the "moral" response rather than the actual one and transit may be viewed as being more "moral" than, for example, driving alone.

Response I28-11

As a minor update, Plan Bay Area 2050+ uses 2023 as the base year, reassessing key assumptions to better reflect post-COVID travel patterns. This includes updated assumptions regarding work from home trends and changes in transit mode preferences observed after the pandemic. The regional travel model incorporates a newly estimated work-from-home model based on MTC's 2023 Bay Area Travel Study and introduces calibrated post-COVID mode preference factors in the mode choice model. These adjustments reflect observed shifts in travel behavior, including reduced commute frequency and documented changes in transit use associated with safety perceptions, convenience, service levels, and evolving habits.

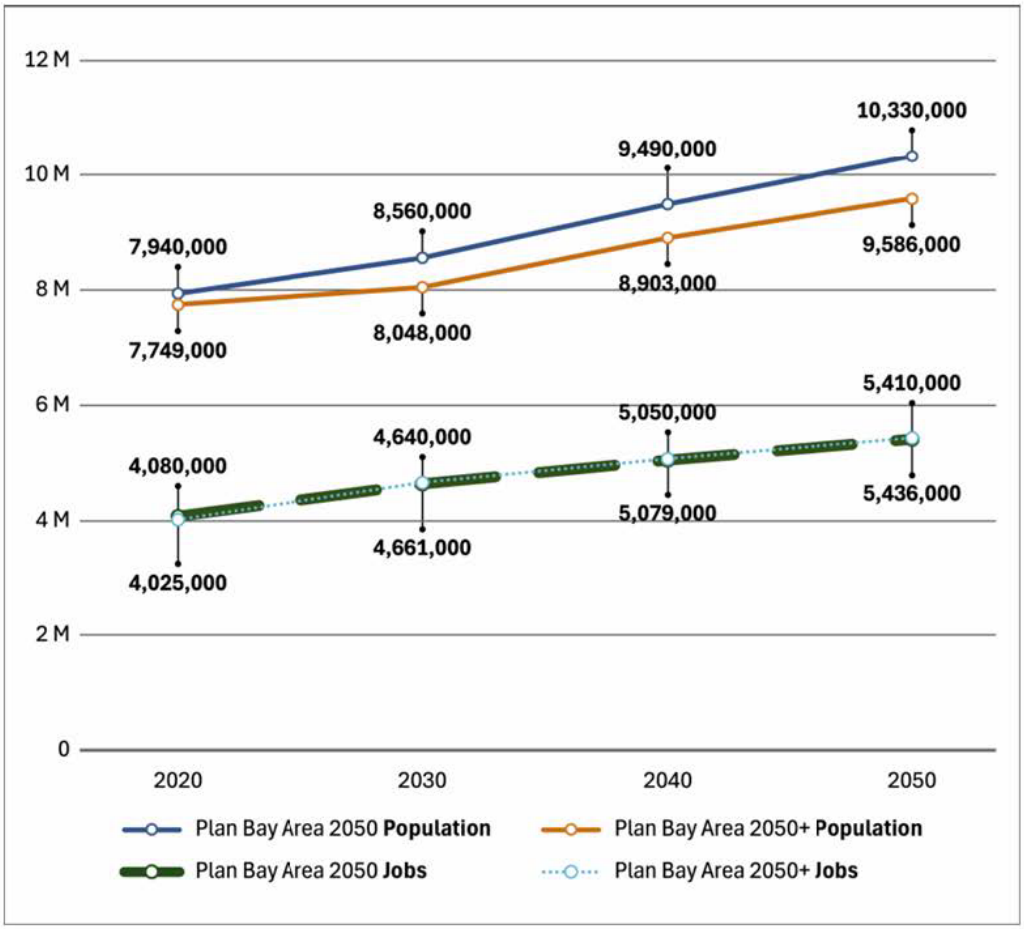
These assumptions are grounded in observed data from MTC's 2023 Bay Area Travel Study, the U.S. Survey of Working Arrangements and Attitudes (SWAA), the Caltrans Performance Measurement System (PeMS), and the National Transit Database, and were calibrated to replicate observed 2015-2023 changes in transit ridership. MTC and ABAG coordinated with the California Air Resources Board (CARB) in developing these assumptions. Additional technical details on these assumptions are included in the documents submitted to CARB, available on https://planbayarea.org/draftplan in the "Technical Methodology" section. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation priorities" regarding how these assumptions might be refined in future plans based on newer data.

Comment I28-12

MTC's PROJECTIONS OF JOBS ARE CONFUSING, INCONSISTENT, AND OF QUESTIONABLE ACCURACY

The following is from PBA2025+, page 59:

Figure 3-2. Forecasted Population Between Plan Bay Area 2050 and Plan Bay Area 2050+



Comparing the population and jobs projections from Plan Bay Area 2050 to those from Plan Bay Area 2050+ produces the following:

PLAN BAY AREA 2050 AND PLAN BAY AREA 2050+ POPULATION AND JOBS PROJECTIONS				
	2020	**2030**	**2040**	**2050**
Plan Bay Area 2050				
Population	7,940,000	8,560,000	9,490,000	10,330,000
Jobs	4,080,000	4,640,000	5,050,000	5,410,000
Jobs: Population	.51385	.54206	.53214	.52372
Plan Bay Area 2050+				
Population	7,749,000	8,048,000	8,903,000	9,856,000
Jobs	4,025,000	8,048,000	5,079,000	5,436,000

PLAN BAY AREA 2050 AND PLAN BAY AREA 2050+ POPULATION AND JOBS PROJECTIONS				
	2020	**2030**	**2040**	**2050**
Plan Bay Area 2050				
Jobs: Population	.51942	.57915	.57048	.55154
Jobs:Population Ratio PBA2050+/Jobs:Population Ratio PBA2050				
	1.0108	1.0684	1.0720	1.0531

In demographic terms, the changes in the Jobs:Population ratios from Plan Bay Area 2050 to Plan Bay Area 2050+ are very large and the impacts quite striking. For example, for 2040, the PBA2050+ population decreased 587,000 (6.19%) from PBA2050, but jobs actually increased by 29,000 (.006%). Similarly, for 2050, population decreased 474,000 (4.59%), but jobs increased 26,000 (.049%).

Perhaps part of the explanation may be found in the following, from page 60 of PBA2050+:

> Plan Bay Area 2050+ anticipates there being 5.4 million jobs in the Bay Area in 2050, similar to the forecast in Plan Bay Area 2050. ***This figure is influenced by a projected increase in "gig work," second jobs and non traditional employment. (emphasis*** added)

The above could be interpreted to indicate that the definition of a job changed from PBA2050 to PBA2050+. Traditionally, in this type of demographic analysis, jobs are defined as "full-time equivilients" (hereinafter "FTE"), which is based on a nominal 2,080[10] annual hours of pay for time worked plus paid time off (vacation/holiday/illness plus other provisions, such as workers' compensation)[11].

[10] The traditional calculation is (52 weeks per year) x (five days/week) = 260 weekdays/year x 8 hours/day = 2,080 weekday hours/year. Technically, factoring how the day of the week a year begins adding a weekday in five out of seven non-leap years and leap years adding an additional weekday every fourth year, the actual average number weekday hours is slightly under 2,088 hours/year.

[11] For travel and transportation planning, each job, even those less than FTE, must be considered separately. The transportation planning emphasis is on trips and each trip to each job must be considered, including trips for jobs that are less than full-time.

However, "second jobs" are generally not full-time; if the above calculation is reporting both full-time and part-time second jobs with values of 1.00, regardless of actual hours worked and/or compensated, and the method of computation is not consisistent from PBA2050 to PBA2050+, then the major change above means that these tables should be clearly labled as presenting inconsistent data.

It must be understood, of course, that there are a variety of issues in determining FTE. For example, what do with overtime? For "non-exempt" workers (legally defined as those that must be paid minimum wages and overtime), the overtime hours must be captured for pay purposes and can be utilized for calculation of FTEs (the National Transit Database methodology for reporting work/pay hours and FTEs approximates this). However, what about "exempt" employees who frequently work hours past the traditional FTE 2,080 hours but are not paid for, and generally do not report, working such hours?

However, in reporting of data, while accuracy is always a major priority, consistency is at least as important, and, for many uses, even more important. When doing trend analysis – as above – change in definition makes the comparison less useful, even worthless – and this is particularly true when the change in definition and methodology is not disclosed.

An alternative explanation could be that MTC's definition of "job" – whatever that may be – has not changed, but that hours worked are changing. For the sake of argument, let us assume that MTC has consistently used the same definition of FTE, including for both the PBA2050 and PBA2050+ reports. It this is true, then it would appear that, based on the change in the jobs;population ratio from these two reports

for 2040, the average worker is putting in 7.2% more hours (.57048/.53214) – and that the average worker who was assumed to be working 2,080 hours in PBA2050 is now assumed to be working 2,230 hours in PBA2050+ – and is therefore counted as 1.072 FTE.

Is this what is being reported?

After an extensive search, I have been unable to find much in the way of explanation of what has actually changed for job reporting between PBA2050 and PBA2050+. Virtually the only other words on point are on page 118 of the PBA2050+ Draft Forecasting and Modeling Report, October 2050:

> In contrast, the employment forecast remains largely unchanged from Plan Bay Area 2050. This stability is due to two factors. The first is national trends, as the CBO's GDP and labor productivity outlook implies a higher job count due to a more tempered outlook in productivity growth. The second involves labor market shifts, including the growth in gig work, second jobs, and self employment, continue — especially in the Bay Area where such employment types are already common. It's important to note that job counts do not directly equate to individual workers, due to the rise in multiple jobholders, remote workers and non-traditional forms of employment.

This appears to confirm that there are changes in employment patterns, but adds little to the understanding of how the counting and reporting of jobs may have changed from PBA2050 to PBA2050+.

Please explain any definitional and/or methodological change since the previous version of PBA and, as appropriate, provide numerical support of the impacts of such change.

More specifically, has the definition of "job" changed, so that PBA2050+ is now counting as a job (a 1.00-count job) what was previously reported as less than a FTE job?

Or, has PBA always reported non-FTE jobs as a 1.00-count job and it is the total number of jobs reported increasing because the number of non-full-time jobs is significantly increasing?

Also, please confirm that the Bay Area jobs reported is actually jobs located within the nine Bay Area counties? How are remote work jobs reported? For example, if a former non-remote job in Alameda County has been filled by a resident of San Joaquin County for many years, but for purposes of PBA2050+, the job is now remote work two days a week and the worker does not enter the Bay Area on these two days for job purposes, how would this job be reported in PBA2050+? As a 1.00 job or as a .60 job (three days/week divided by five days/week)? What about a job for a Bay Area employer that has shifted to remote work and the current job-holder is in the Bay Area only rarely, if at all? And how is such commuter work handled for transportation modeling and planning purposes?

Response I28-12

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plans regional employment forecast. Please also refer to Chapter 2, "Project Description," of the Draft EIR regarding the proposed plan's regional employment forecast. For the question related to job definitions, see the Plan Bay Area 2050+ Forecasting and Modeling report which includes discussion of the employment concept.

Comment I28-13

BASED ON THE LONG-TERM TRACK RECORD OF THE BAY AREA TRANSPORTATION AGENCIES WITH THE PLANNING AND DEVELOPMENT OF MAJOR TRANSPORTATION CAPITAL PROJECTS, THE COSTS AND TIMING OF SUCH PROJECTS IN PBA2050+ ARE NOT CREDITABLE

Two important up-front statements:

1. PBA2050+ and the PBA2050+ DEIR and the supporting documents are program-level plans and environmental clearance documents and are not project level documents. My comments on these projects are for the purpose of showing that the Bay Area transportation agencies have a terrible records of bringing in major capital projects on-time, on-budget, meeting technical specifications, and achiving projected transportation benefits ***and, therefore, the projections in the PBA2050+ Draft, the PBA2050+ DEIR, and the various supporting documents lack credibility***.

Response I28-13

Plan Bay Area 2050+ is a long-range regional plan and includes planning-level project concepts coordinated with implementing agencies. Project scope, cost, schedule, ridership, and funding assumptions may be refined over time as implementing agencies advance projects and as conditions change. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding project lists and ongoing coordination.

Additionally, MTC and its partners recognize the need to improve capital project delivery. The Plan Bay Area 2050+ Implementation Plan includes actions focused on improving capital project delivery:

- Action 24: Explore approaches to improve the efficiency and cost-effectiveness of transportation project delivery with partners.
- Action 25: Update how MTC prioritizes and sequences large transportation capital projects following Plan Bay Area 2050+ adoption.

Comment I28-14

2. MTC is the responsible agency for almost none of the major capital projects in the region and, therefore, cannot be held ***solely directly*** responsible for their various shortcomings. However, as MTC ***is*** the entity responsible for the coordination of these organizations and for the coordination and approval of their projects and their funding, it is certain fair to assign a major share of the responsibility to it – and, after all, all of these projects are comprehended by PBA2050+ and the the PBA2050+ DEIR.

Or, to put it another way, if ***not*** MTC, then who?

Response I28-14

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The role and authority of MTC are described in Section 1.7.2, "Regional Planning Agencies," of the Draft EIR:

> MTC was formed in 1970 and functions under State and federal law as the transportation planning, coordinating, and financing agency for the nine-county San Francisco Bay Area. It covers the same geographic area as ABAG. MTC is the federally designated metropolitan planning organization (MPO) and the State-designated regional transportation planning agency (RTPA) for the Bay Area. It is responsible for preparing and updating the RTP every 4 years.

For transportation planning, MTC functions both as the regional transportation planning agency—a State designation—and, for federal purposes, as the region's MPO. As such, MTC is responsible for regularly updating Plan Bay Area, which integrates investments in mass transit, highway, airport, seaport, railroad, bicycle, and pedestrian facilities as part of the transportation strategies. MTC also screens requests from local agencies for State and federal grants for transportation projects to determine their compatibility with Plan Bay Area. The proposed plan also functions as the integrated transportation and land use/housing strategy required under SB 375 with the goal of accommodating future population growth and reducing

GHG emissions. The majority of anticipated funds prioritized in the proposed plan are allocated (by mode) to public transit and (by function) to operation and maintenance of existing services and facilities.

MTC promotes best practices and the development of new or revised programs, guidelines, procedures, policies, and development standards to support land uses that help reduce vehicle miles traveled. These actions contribute to achieving MTC's GHG emissions reduction target under SB 375. To be eligible for regional, state, and federal transportation funding programs, transportation projects must demonstrate that they are consistent with the proposed plan. Furthermore, regionally significant transportation projects—generally defined as projects that add travel lanes to freeways, expressways and highways or add new routes to fixed guideway transit facilities (e.g., rail, ferry, bus rapid transit)— must be listed in the fiscally constrained Plan Bay Area 2050+ Transportation Project List in order to progress from design to implementation or construction.

MTC and its partners recognize the need to improve capital projects delivery. Please see Response I28-13 regarding actions in the Plan Bay Area 2050+ Implementation Plan focused on improving capital project delivery.

Comment I28-15

My biggest problem in preparing this section is selecting which out of the large number of candidates of poorly managed and controlled projects to include – which includes problems with the initial project plans, budgets, schedules, and utilization often been grossly wrong and almost always optomistic.

Response I28-15

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-16

Valley Link

The details of Valley Link, the project, have shifted greatly over time, but the essence is a commuter rail line between BART Pleasanton Station and, eventually, Stockton.

The government agency responsible for Valley Link is the Tri-Valley – San Joaquin Valley Regional Rail Authority (hereinafter "TVSQVRRA"). TVSQVRRA is a joint powers agreenment of Alameda and San Joaquin Counties, cities located in San Joaquin County and the Tri-County corridor in Alameda County, ACE, BART, Livermore Amador Valley Transit Authority (Wheels), and the Mountain House Community Services District.

I'm going to focus primarily on costs, schedule, and performance, as reported in various documents over time:

- TVSQVRRA*, Final Valley Link Project Feasibility Report*, October 2019, for a line from Pleasanton BART to North Lathrop[12] in San Joaquin County, capital cost of $2.417- 3.211 billion (year-of-expenditure dollars for a construction period ending at the beginning of the operations period following), operating costs of $29.4-35.2 million (for 2028), revenue service commencing between the second quarter of 2027 and the fourth quarter of 2028 (page 1-11), and 26,000-28,000 daily riders by 2040 (page 1-8)

- ACTC, "Valley Link: TEP Amendment, A presentation to the ACTC Planning Policy and Legislation Committee," 9/4/20, has capital costs of $2.749 billion in mid-point year-of-expenditure dollars

and 2025[13] daily ridership of 11,101 (slide 15) for operations beginning in the fourth quarter of 2028 to North Lathram

- TVSQVRRA, DIER, December 2020, page ES-18/19, has capital costs of $2.335-2.919 billion and operating costs of $10.283-34.504 million in 2028 (then projected first year of operations) and $55.344-85.581 million in 2040, and daily ridership of 12,704-13,356 (depending on alignment) in 2028 and 31,710-32-993 2040 (page ES-16) for operations to North Lathram.

- TVSQVRRA, Final Subsequent Environmental Impact Report, October 2024, does not contain any cost data (which, in my experience, is most unusual)

- U.S. DOT/Federal Transit Administration, *Annual Report on Funding Recommendations*, Fiscal Year 2025, Valley Link Project Phase 1 (to Mountain House) (based on submissions to FTA from TVSQVRRA dated May 2022) has capital costs of $1.8 Billion

- U.S. DOT/Federal Transit Administration, *Annual Report on Funding Recommendations*, Fiscal Year 2026, does not include Valley Link, but this should most likely be considered a function of the Trump Administration changing the transit projects under consideration

- TVSQVRRA, Valley Link Project Update SJ Valley Legislative Caucus August 26, 2025, has a total project capital cost of $3,794 - $4,465 billion from Pleaston to Mountain House and 2045 daily ridership of 9,965; operating cost is not specified. Also, the capital cost above has a note, "Total project cost excludes (10) rail vehicles planned as annualized lease."

- PBA2050+ Draft Transportation Project List Report, October 2025, page 32, for Valley Link to Mountain House, has capital cost of $2,375 million and operating costs of $679 million for the 15-year period, 2036-2050, a simple average of $45.3 million/year[14].

Obviously, much has changed since the original project concept. The most recent incarnation is appoximately two-thirds the route distance of the original, but over 45% higher cost – although the distance being proposed currently is significantly more expensive to construct per mile and the schedule slippage means the later estimate dollars are increased due to inflation. The ridership for the shorter segment is approximately one-third of the earlier projections to North Lauhrup.

[12] Distance from the Pleasanton BART station to various terminus stations are approximately 22 miles to Mountain House, 37 miles to North Lathrop, and 47 miles to Stockton. Distances may vary depending on the precise alignment.

[13] 2025 appears to be in error, conflicts with 2028 operating date in next slide.

[14] At a minimum, it appears that the Project List Report should be updated to the latest data from the sponsoring agency.

In addition, also page 32, RTPID 25-T12-179, "Light Rail/Service Expansion/VTA/Eastridge," with an operating cost of zero ($0) for the 2025-2035 period of operations appears to require, at the minimum, an explanation.

I'm now going to calculate the cost per passenger in the last year of the projection, 2045. This will require a number of assumptions that may result in inaccuracies, but I believe that such variances will likely be relatively minor and I am deliberately selecting methodologies and values to reduce the cost.

I will be using the FTA "new starts" costing methodology, which comprehends both capital and operating costs. Capital costs are annualized over the useful lives of the assets at a 2% annual discount rate. I am going to assume a 30-year average useful life, which, in my experience, is generally well within the likely range for projects of this type.

Valley Link Project to Mountain House Calculation of Annual Cost per Passenger, 2045	
Total Capital Cost, Average of High and Low Range of Estimate	$4,129,500,000
Times: 30-Year Annualization Factor at 2%	.044645
Annualized Capital Cost	184,361,528
Annual Operating Cost[15]	45,266,667
Total Annualized Cost	229,628,195
2045 Projected Daily Ridership	9,964
Daily:Annual Factor, ACE 2019 National Transit Database "profile[16]"	250
Estimated 2045 Annual Ridership	2,491,000
2045 Cost Per Passenger	$92.18

[15] Although I believe that it would be more proper to include the capitalized costs of the rail vehicle identified in Legislative Caucus Update as a capital cost, for purposes of this calculation, I'm going to assume that these costs are included as operating costs. If not, then the total annualized cost is understated.

[16] It would be difficult to construct a more perfect peer for Valley Link than ACE; both are commuter rail systems that operate from San Joaquin County through the Tri-Valley. The annualization factor is calculated by dividing the annual unlinked passenger trips for 2019 (the last full pre-COVID reporting year) of 1,506,183 divided by the average weekday ridership of 6,025, producing 249.99, rounded to 250 in the above. 90182 2019 Agency Profile

(The actual metric for FTA reporting is cost per new passenger; for purposes of this calculation, I am assuming that none of the Valley Link passengers were formerly utilizing any other transit systems, which is unlikely given that ACE has been operating along the same corridor for many years; therefore, counting all passengers as new transit riders is likely reducing the size of this metric.)

So we are clear, the value shown is cost for one, one-way trip, and is exclusive any other transit costs, such as Valley Link riders who might transfer to BART at Pleasanton to complete their trips.

So, for regular riders, the round-trip cost per day would be $184.36, the cost per week would be $921.80, the cost per month would be $3,994, and the annual cost would be $47,934.

It would likely be far cheaper if the government leased each rider a new electric vehicles and paid all financing, maintenance, battery charging, insurance, parking, registration, and other costs of vehicle operations.

Now let us consider who will be riding. In the reports cited above, we have two tables of ridership by station, which can be used to approximate ridership by county of residence (not perfectly of course, but very close):

- Valley Link FEIR, 4/30/21, Table ES-5, "Valley Link Average Weekday Ridership – 2040 Full Project Implementation, page ES-16, for a line to North Lathrop, shows that 29.5% of boardings in the morning commuter direction were at the Alameda County stations; which can be reasonable used to project that close to 70.5% of the morning peak riders are residents of San Joaquin or other Central Valley Counties (it is possible that some Alameda County residents could board at Mountain House, which is just over the line from Alameda County in San Joaquin County. However, since eastern Alamenda County is in the mountains/hills just west of the San Joaquin County line, and boarding at Mountain House would require a trip in the contra-commute direction to come back the way the started from, this number is likely very low – and total Mountain House boardings in this table were the lowest of any station, only 4.4% of the morning total).

- Valley Link SEIR, 4/24, Table 2-5, "Valley Link Average Weekday Ridership – 2040 IOS Implementatoin," page 2.31, for a line to Mountain House, shows that 29.2% of boardings in the morning commuter direction were at the Alameda County stations; which can be reasonable used to project that close to 70.8% of the morning peak riders are residents of San Joaquin or other Central Valley Counties (as in the previous case, it is possible that some Alameda County residents could board at Mountain House, which is just over the line from Alameda County in San Joaquin County, but these numbers would be unlikely to be much higher than in the previous case.).

Therefore, approximately 70% of the ridership appears to be from San Joaquin and other non-Bay Area counties (and the non-Bay Area riders will be taking far longer and therefore more costly rides), but virtually all of the local funding is coming from the Bay Area counties, including $400 million committed from ACTC's Measure BB sales tax and $95 million allocated by MTC from AB 1171 Bridge Toll Funds[17]. To date, there is virtually no funding allocated from San Joaquin County and there does not appear to be any plan to place any potential funding for Valley Link before the voters. Even assuming major funding from FTA (which is questionable, particularly given the attitude of the current Federal Administration and Congress towards transit and the State of California), there is still a shortfall of at least $1,285 million (SJ Valley Legislative Caucus, slide 13). Funding from the State of California is also unlikely given the status of the State's financial situation.

[17] MTC, MTC Resolution No. 3914, Revised, October 9,2024, 8d: Summary Sheet - MTC Resolution No. 3914

Response I28-16

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Projects with costs exceeding $250 million that are included in the Transportation Project List, including the Valley Link project, underwent a Project Performance Assessment that evaluated future project costs and benefits. The Project Performance Assessment is detailed in the Plan Bay Area 2050+ Performance Report. Additional information about the development of transit strategies and projects for inclusion in the plan is provided in the Transit 2050+ Report.

As noted in the comment, the Valley Link project scope continues to evolve as the project advances through project development and seeks to reduce costs to match currently available funding sources while also optimizing project benefits. The project descriptions included in the Draft Plan Bay Area 2050+ Transportation Project List were finalized at the beginning of 2025. The Valley Link project description included in the Transportation Project List was the most up-to-date project description at the time. MTC is continuing to work closely with the project sponsor as they continue to revise the project scope and costs. Once finalized, MTC will move forward with an amendment to Plan Bay Area 2050+ to reflect changes to the Valley Link project scope and costs.

Moreover, Plan Bay Area 2050+ project lists and implementation priorities may be revised as projects evolve. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding implementation priorities.

Comment I28-17

Thank you for addressing my concerns.

23 CFR[18] 450.104 "Definitions" has:

> *Financially constrained or Fiscal constraint* means that the metropolitan transportation plan, TIP, and STIP includes sufficient financial information for demonstrating that projects in the metropolitan transportation plan, TIP, and STIP can be implemented using committed, available, or reasonably available revenue sources, with reasonable assurance that the federally supported

transportation system is being adequately operated and maintained. For the TIP and the STIP, financial constraint/fiscal constraint applies to each program year. Additionally, projects in air quality nonattainment and maintenance areas can be included in the first 2 years of the TIP and STIP only if funds are "available" or "committed."

As this works in the real world, it is not necessary for a project to have funding fully committed to be included in the Transportation Improvement Program, but the potential source of funding must be in existence and be idenfitied. So, since Valley Link is well along in the application process for an FTA 49 USC 5309 Fixed Guideway Capital Investment Grant, it is identified as "fiscally constrained" for that source of funding.

However, the source of funding must actually exist. For example, if a key component of funding is to come from a new local transportation tax that has been proposed for approval in an election, but the election has not yet occurred, that source of funding could not be counted towards a finding of a financially contrained project.

[18] Title 23 of Codified Federal Regulations refers to roads; Title 49 is for transit and the comparable definition is identical. In transportation planning, it is traditional to refer to the requirements for roads.

The table below is from Valley Link, Valley Link Project Update SJ Valley Legislative Caucus August 26, 2025, slide 13[19]:

Phasing Alternatives		D/P to Mountain House *(10 vehicles)*	D/P to Vasco Direct ACE Connection *(6 vehicles)*	D/P to Southfront Bus ACE Connection *(5 vehicles)*
Total Project Cost ($M, YOE)		$3,794 - $4,465	$2,025 - $2,186	$2,161 - $2,305
FTA Share	**40%**	$1,518 - $1,786	$810 - $875	$928 - $990
	49.4%	$1,874 - $2,206	$1,000 - $1,080	$1,068 - $1,139
Existing Local Funding Match		$635	$635	$635
Additional Funding Need	**FTA @ 40%**	$1,641 - $2,044	$580 - $677	$598 - $680
	FTA @ 49.4%	$1,285 - $1,624	$390 - $471	$459 - $531
Ridership (Weekday, YR 2025/2045)		4,384/9,965	TBD	2,360/5,040

As the "Additional Funding Need" of $1,285 to $2,044 million in the "D/P (Dublin/Pleasanton BART station) to Mountain House" column does not identify any source, please explain the justification for including Valley Link in the "fiscally constrained" plan.

[19] 5.C_-_Presentation_-_Valley_Link_Informational_Update.pdf

Response I28-17

Please refer to Response I28-16. Please also refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding plan funding.

Comment I28-18

Another major issue is that TVSJVRRA and the other Valley Link proponents have also determined to not give more than minimal, token consideration of what may be very competative alternatives, particularly long-haul commuter express bus service20 on expressways, including the existing I-580 ExpressLanes in

the Tri-Valley in Alameda County, the I-205 ExpressLanes not being planned in San Joaquin County, the possible I-580 ExpressLanes over the hills between Livermore and near Mountain House in eastern Alameda County, which has been identified as a potential project by MTC and ACTC.

Response I28-18

The commenter's statements are noted. The comment does not raise concerns regarding the adequacy, accuracy, or completeness of the Draft EIR on the proposed plan. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Please note that Plan Bay Area 2050+ includes planning-level project and funding assumptions and recognizes that many implementation actions depend on future decisions and funding availability. The plan may be updated and revised over time as project funding and implementation conditions evolve. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" and "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan funding and revisions.

Please also note that, although MTC is not the project sponsor for the Valley Link project, MTC continues to work closely with the project sponsor to minimize project costs and optimize potential project benefits for Valley Link. The project has already completed its environmental review stage, and alternatives to the current rail project have been considered by both the public and decision makers. Plan Bay Area 2050+ does not re-adjudicate historical project decisions, and plan strategies/projects may be revised as conditions and information evolve.

Comment I28-19

In my professional opinion, as detailed in my publication for Reason Foundation*, Express Bus and Express Lanes System for the San Francisco Bay Area*[21], such a bus option has a strong possibility of having far less capital costs than Valley Link rail, would take far fewer years to implement, have operating subsidies a fraction of those for rail, and dramatically lower risks because such bus service is very scalable and can be changed, reduced, increased, including on a route-by-route base, or even elimnated entirely if unsuccessful, unlike Valley Link rail, which would require over $2,000,000,000 of public sector funds before there is the first chance to see how successful it might be in attracting and retaining riders.

Of course, before commencing construction of any such project, indeed, before construction or even completing planning, there should first be a determination if there is any need of it. In this particular, pre-COVID, one of the major justifications asserted by the advocates was the need for additional capacity as ACE – which operates in the same corridor – is overloaded and cannot significantly increase ridership because it operates on freight rail lines. However, ACE's ridership has dropped over 50% since its 2019 peak … and there are feasible ways to increase its capacity.

While a very strong case can be made that this is a very poor transportation project, one that, at a minimum should not go forward without proper needs analysis and study of other options, my purpose for including it in this comment on PRB2050+ is not to argue against it going forward, but to show how – from the documents prepared by its proponents – its capital and operating costs have increased significantly, its schedule operating year has been pushed back, the project has been shortened even as costs have increased, and its ridership projections have decreased, with huge uncertainty as to how the huge funding gap (currently at least approximately 20% for the least expensive minimum operational segment) could be covered.

The point is, the projections of the Bay Area transportation infastructure community, led by MTC, for the costs, revenue sources, timing, and productivity of the proposed projects are simply not creditable.

[21] Express Bus and Express Lanes System for the San Francisco Bay Area - Reason Foundation, February 25, 2021.

Response I28-19

Please refer to Response I28-13. Plan Bay Area 2050+ does not re-adjudicate historical project decisions, and plan strategies/projects may be revised as conditions and information evolve. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I28-20

PBA2050+ DEIR Table 1-1: Building Industry Association Settlement Agreement Components and Compliance Information, Agreement Paragraph 6a., page 1-14, has:

Agency Obligation

Regional Housing Control Total and Forecasted Development Pattern. The SCS shall set forth a forecasted development pattern for the region that includes the Regional Housing Control Total, which shall have no increase in in-commuters over the baseline year for the SCS.

Please discuss how the expenditure of $2,375 million for capital costs and $679 million for operating costs for Valley Link, as indicated in the PBA2050+ Draft Transportation Project List Report will not conflict with the above stated Agency Obligation. Given that TVSJVRRA's own Valley Link ridership reports show that over 70% of riders will be boarding in the morning in San Joaquin County stations, it would appear that one of the main achievements of Valley Link will be bringing non-Bay Area residents to Bay Area jobs. Also, the same environmental clearance documents discuss Valley Link role in reducing traffic congestion inward to the Bay Area in the morning home-jobs commute direction and outbound in the evening jobs-home commute direction can be interpreted as making the Central Valley to Bay Area commute shorter and easier.

Response I28-20

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" and "Master Response 1: Regional Growth Forecast" regarding agency obligations and growth forecasts. As discussed in the master responses, the requirement that the forecasted development pattern in the SCS have "no increase in in-commute" requires the region to plan for sufficient housing to limit displacement into the neighboring regions. In other words, while some level of in-commuting occurs and is expected to continue, the proposed plan is required to assume no increase in in-commuting over the plan horizon to facilitate planning that can accommodate projected regional growth. It does not obligate ABAG or MTC to refrain from creating an accurate Transportation Project List Report based on proposed transportation projects. Moreover, the objective of the Valley Link project is to provide a new transit mode in the corridor that would enable a mode shift from autos to transit. Additionally, as stated in Response I28-16, Plan Bay Area 2050+ project lists and implementation priorities may be revised as projects evolve.

Comment I28-21

BART Dublin/Pleasanton and Warm Springs Extensions and Oakland Airport Connector

There have been three county-wide transportation sales taxes approved in Alameda County in recent decades, the first in 1986, the second in 2000, and the third in 2014 (after a failed attempt in 2012). The case study primarily concerns the first two of these.

The following is an excerpt *from Alameda County Transportation Expenditure Plan*, August 1986, prepared by the Alameda Countywide Transportation Committee, the interim entity that was established to prepare the original program of projects and funding for the monies to be raised by a fifteen-year one-half cent

sales tax. This document was intended to be the primary information for voters, elected officials, and other interested parties as they prepared to make their decisions to approve or disapprove the ballot measure[22]:

> "Project: Dublin Canyon Rail Extension/Warm Springs BART Extension
>
> Cost: $565 million Sales tax contribution: $170 million
>
> "This project includes two parts: the Dublin Canyon Rail extension and the Warm Springs BART Extension. Dublin Canyon will consist of a rail line from the Bayfair BART station along the I-580 corridor. Whether this line will be light or heavy rail will depend on the outcome of a locally produced Alternatives Analysis addressing this corridor.
>
> "The Warm Springs BART extension is planned to extend from the Fremont BART station to Warm Springs.
>
> "Dublin Canyon is expected to cost $220 million in a heavy rail configuration, and Warm Springs $345 million. A total of $170 million is to be allocated from sales tax revenues for the Dublin Canyon portion of this project. No sales tax revenue will be allocated to the Warm Springs extension until the Dublin Canyon extension is fully funded and ready for implementation."

The above costs are expressed in 1986 dollars (page 7). All conversions to constant dollars are made by using the U.S. Department of Labor, Bureau of Labor Statistics, Consumer Price Index-Urban Consumers, for the San Francisco-Oakland-San Jose area.

[22] Page 5, Accessed May 2, 2013: http://www.alamedactc.org/files/managed/Document/7697/1986_MeasureB_Expenditure_Plan.pdf

Obviously, the message that anyone reading the above would take away would be that a vote for the sales tax would result in the construction of both the Dublin Canyon and Warm Springs extensions – with the caveat that funding of Warm Springs was contingent on the Dublin Canyon (now Dublin/Pleasanton) extension coming in on budget. While the document, very properly, did not mandate a specific transit mode, leaving that for the later Alternatives Analysis and follow-on process, the clear identification of the cost of heavy rail – BART – served as a clear indicator of the most likely modal choice outcome.

The Pleasanton Extension wound up costing $514 million[23]. Construction was completed in 1998, so, assuming a 1996 mid-point of construction, the 1986 dollars cost was approximately $370 million – or approximately $150 million, or 68%, over the 1986 estimate.

The above does not include the costs of the West Dublin/Pleasanton Station, which was BART's first "in-fill" station (a new station not added at the end of a pre-existing transit line) since the Embarcadero Station was added late in the original BART system planning. There is some argument that this station was to be part of the Dublin Canyon extension, but was eliminated as a cost-reduction measure. It opened in 2011, at a cost of $106 million[24], including a $20 million budget overrun and a significant delay in opening due to design/construction issues, and this was up from a $25 million construction estimate in 2002[25]. If we assume a 2009 date for construction mid-point, the $106 million would be $53 million in 1986 dollars. If this were to be added to the extension cost above, the total would be approximately $423 million, $203 million, or 92%, over the 1986 "Dublin Canyon" cost projection that was provided to voters to guide them in making their decision to approve the transportation sales tax.

[23] OPAC Consulting Engineers, "BART Dublin/Pleasanton Extension," accessed May 2, 2013: http://www.opacengineers.com/projects/BARTDPX

[24] BART, "New West Dublin/Pleasanton Station, BART's 44th, to open February 19," January 21, 2011, accessed May 2, 2013: http://www.bart.gov/news/articles/2011/news20110121.aspx

[25] Hacienda Network, "Dublin/Pleasanton BART: Changing the Tri-Valley Commute in Just Five Years," April 16, 2002, accessed May 2, 2013: http://www.hacienda.org/ho/nw0204_bart5th.html

Because of the shortfall caused by the cost overrun on this extension, among other things, there was no funding left in the 1986 bond issue to fund the Warm Springs extension, which had to be delayed until a new source of funding was found – the 2000 extension of the original 1986 sales tax.

(Another interesting matter is the option not considered. Prior to the opening of the Dublin/Pleasanton extension in Alameda County and the Pittsburg/Bay Point extension in Contra Costa County, BART had fulfilled the campaign promise to provide transit service to the Eastern portions of these counties by contracting for bus service – which was terminated shortly after the service on these extensions opened. Interestingly, this service was the most cost-effective – lowest subsidy per passenger – of any transit service in the Bay Area before it was canceled. However, this interim transit solution was not at all satisfactory to the people in Eastern Alameda County who had been paying the BART taxes for decades without getting any BART rail service.)

But, from a pure transportation cost-effectiveness/productivity/carrying capacity viewpoint, this raises the question of why, instead of the expense of building a heavy rail line in the median of a subway, a busway/high-occupancy vehicle (HOV) lane was not considered instead. The cost of construction would have been far lower and the utilization far higher, measured in terms of trips and passenger-miles. Also, the project could have been readied for service much faster and, if developed as an ExpressLanes (similar to those on I-580 in the Tri-Valley) as are currently being operated and expanded in the Bay Area, it would provide significant transportation benefits to many other travelers – and taxpayers.

If fairness, while the concept of high-occupancy toll (HOT) lanes was certainly well-known to transportation professionals at this time, there were no operating examples in the United States. If this lane had been designed and opened as a Busway/HOV/HOT lane, or HOT was added later, the revenues could have covered a substantial share of the construction costs, perhaps even all. For the cost of the extension to Pleasanton, it is possible that a Busway/HOV lane or Busway/HOV/HOT lane could have been constructed to Livermore – or even over hills as far as the I-580/I-205 merge or even all the way to the I-205/I-5 merge, proving vastly more mobility, at far lower taxpayer subsidy.

However, a thorough search of the ABAG/BART library failed to disclose a single reference to this option even being mentioned when the Dublin/Pleasanton BART extension was proposed and studied.)

The following are excerpts from "Alameda County's 20-Year Transportation Expenditure Plan," July 2000[26]. This document was prepared for the election that year on the extension of the sales tax authorized in 1986 and had a similar origin and purpose. All costs are in 1998 dollars (page 10):

> "BART Extension to South Fremont (to connect to Santa Clara County Extension)
>
> Sales Tax Funding $165,500,000
>
> Other Funding Sources $380,800,000
>
> Project Cost $546,300,000" (page 12)
>
> "BART Oakland Airport Connector
>
> Sales Tax Funding $ 65,800,000
>
> Other Funding Sources $ 64,200,000
>
> Project Cost $130,300,000" (page 13)

The cost of the Warm Springs extension had gone from $220 million in 1986 dollars to $546.3 million 1998 dollars, which is approximately $369 million in 1998 dollars – an increase of approximately $149 million, or approximately 68%.

The Alameda County Transportation Commission "Project Fact Sheet" for the BART Warm Springs Extension, March 2013[27], shows a total cost of $890 million and a mid-point of construction of approximately 2012, which would convert that cost to approximately $412 million in 1986 dollars – an increase of approximately $192 million, or approximately 87%, in constant 1986 dollars.

The project finally opened in March of 2015 – twenty-nine years after the Alameda County voters passed a bond issue that they were told would fund it.

Turning now to the "Project Fact Sheet" for the BART Oakland Airport Connector[28], we have a total project cost of $484.1 million. The mid-point of construction appears to be 2012, so this converts to approximately $331 million in 1998 dollars, when a cost of $130.1 million was given to the voters to assist them in making their decision to support the sales tax extension or not. This is an overrun of approximately $200 million – or approximately 154%.

From BART's ridership data, Oakland International Airport boardings ranked 49th out of BART's 50 stations, 634 (.033%) of the total of 193,264[29] – or slightly over $763,000 of capital expenditures for each daily boarding, to replace a well-working shuttle bus system that covered an unusually high percentage of its total costs out of passenger fares.

This expenditure provides a fixed guideway transit system from the Oakland Airport to the nearby BART Coliseum Station, replace the AirBART shuttle bus system which was almost self-supporting. The Airport Connector is slightly faster than the shuttle bus and, not being subject to traffic delays, offers somewhat more consistent travel times than the previous AirBART shuttle buses (although major delays were rarely an issue), but the fares, which doubled when the Connector opened, does not cover the costs of operations, let alone capital renewal and replacement, so the taxpayers and/or airport patrons, will have to otherwise subsidize it.

What was the transportation purpose for replacing the AirBART shuttle bus with the BART Airport Connector? Difficult to understand, back in the day when the decision was being made, even more difficult today.

Perhaps it would be more enlightening to ask what was the political purpose for this decision – and the answer may be as simple as, "Well SFO is getting an extension into the airport, so we need to do one for Oakland Airport for 'equity'".

(These ridership results may also offer something of an explanation of why, after the first two Alameda County Transportation Sales Tax issues passed relatively easily, the third attempt, B1 in November 2012, narrowly failed to be approved by the required two-thirds majority.)

These projects have been completed for years, so it far too late to question, let alone change, any decisions. Again, the purpose of providing this document is to call into question the record of the Bay Area transportation infrastructure community, led and coordinated by MTC, to properly project and manage its projections of project costs schedule, and production and project implementation.

[26] Accessed May 2, 2013: http://www.alamedactc.org/files/managed/Document/8472/2000_Measure_B_Ballot_and_Plan.pdf

[27] Accessed May 2, 2013: http://www.alamedactc.org/files/managed/Document/4654/ACTIA6020_BARTWarmSpringsExtension_factsheet.pdf

[28] Accessed May 2, 2013: http://www.alamedactc.org/files/managed/Document/4642/ACTIA6030_BARTOaklandAirportConnector_factsheet.pdf

[29] BART, 2024 Ridership by Station, Station Profile Study | Bay Area Rapid Transit -- Average Tues-Thurs Entries by Station, Based on Sept. - Nov. 2024 BART Faregate Entries from 4am - 9:59pm.

Response I28-21

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. Please refer to Responses I28-3 and I28-19

Comment I28-22

San Francisco Bay Area Rapid Transit District Colma and San Francisco International Airport (SFO) Extensions

The BART heavy rail system in the San Francisco Bay area began service in 1972. The Colma Station and extension opened in 1996 and the extension to San Francisco International Airport and Millbrae opened in 2003. The SFO extension, 8.7 miles of track, four stations, and an operating and maintenance facility, is basically the third and final phase of a plan to extend the system to the airport and beyond. The one-mile extension to the Colma Station was the second, with the tail track storage line South from Daly City Station the first (not comprehended by this case study). Ridership data for these two projects, therefore, are very interrelated.

Colma Station

This project consisted of a one-mile track extension and one new station with a bus transfer facility and a five-level, 1,400-space parking garage[30]. San Mateo County voters overwhelmingly approved the project in 1985, and the planning process began shortly thereafter. Between the time of the Final Environmental Impact Statement (hereinafter "EIS") reports and project being adopted and the finish of the project, the scope was decreased in terms of length and surface parking and was increased in terms of underground rail (up .08 miles) and elevated track (about .06 miles)[31].

Estimates contained in the Draft and Final EIS' and the Full-Funding Grant Agreement (hereinafter "FFGA") with the U.S. Department of Transportation in terms of capital expenditures were far below the actual costs incurred as is seen in the following table. This is due principally to the changes in scope. Increased raised rail and subway sections add to cost dramatically over at-grade construction. The FFGA, however, was a reliable estimation of the final capital expenditure levels.

Predicted and Actual Capital Costs - BART Colma Extension[32]

	Total Capital Cost (millions)				Ratio of Actual to Predicted Costs (%)		
	AA/ DEIS	FEIS	FFGA	As Built	As-Built vs. AA/ DEIS	As-Built vs. FEIS	As-Built vs. FFGA
As Estimated	$94.9 (1986 $)	$120.7 (1990 $)	$170.2 (1993 $)	$179.9	189.6%	149.1%	105.7%
Adjusted to Opening Year (1996 $)	$112.5	$130.1	$171.6	$179.9	159.9%	138.2%	104.9%

While ridership estimates were higher than actual ridership, they came within about 10% of the actual as-built levels. It is presumed that the difference is due to service levels being 33% below what was estimated in the DEIS and FEIS. O&M Costs as compared to estimated costs are considered "reasonable" by the FTA.[33]

Because the BART system had been operating in the San Francisco Bay Area since 1972, and because there was considerable experience in planning and building rail systems and extensions, estimates for

BART Colma were quite accurate. The FTA put it this way: "This project was a one station extension of a long operating existing heavy rail system with ample data regarding the existing travel patterns. High quality data and long experience with the transit market near the extension surely helped to facilitate accurate forecasts."[34] BART planners in this case were able to come within 10% of true ridership numbers and FFGA estimates were within 5% of the as-built capital cost.[35]

[30] San Francisco Bay Area Rapid Transit District, April 15, 1993, "BART Chronology," accessed November 8, 2010: http://www.bart.gov/docs/BARThistory.pdf

[31] DOT/FTA, Contractor Performance Assessment Report – 2007, page 69 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

[32] DOT/FTA, Contractor Performance Assessment Report – 2007, page 72 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

[33] DOT/FTA, Contractor Performance Assessment Report – 2007, page 73 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

[34] DOT/FTA, Contractor Performance Assessment Report – 2007, page 72 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

[35] DOT/FTA, Contractor Performance Assessment Report – 2007, page 73 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

Response I28-22

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-23

SFO/Millbrae Extension

This project extended the BART heavy rail system to San Francisco Airport and further South to Millbrae from the COLMA station, an addition of 8.7 miles and four stations.[36] This project is an example of how cost estimates often go up significantly over the course of the planning period between Alternative Analysis/DEIS, FEIS, FFGA, and actual construction. The overall scope of this project also changed between DEIS and actual construction.

In 1990, a preferred alternative was selected that included a three station, 6.4-mile rail extension with a locally funded, on-airport, light rail system (that was the term used, but it appears that automated people mover was actually closer to what was being considered), and was initially expected to cost $960 million (YOE). Three years later the DEIS was amended to take on a larger scope. The project was now expected to construct an 8.2-mile, four-station extension, with a cost of $1.11 billion (YOE). Following a June 1996 FEIS, project cost had escalated further to $1.17 billion. This is the same amount specified in the 1997 FFGA, with a total federal New Starts obligation of $750 million and an expected revenue date of September 30, 2001.[37]

Within two years expected YOE cost was $1.51 billion and delays were expected.[38] One important change to the project at this time was upgrading five existing rail yards instead of buying rail vehicles. Besides this the contractor experienced delays due to weather, there was an unexpected requirement to increase the size of the aerial structures to withstand earthquakes, as well as some environmental impact mitigation requirements that were not foreseen.[39] When the project finally opened for revenue two years late, the cost of completion had run to $1.55 billion. Because the amounts of Federal and State of California ($152 million) did not increase as the project cost increased, the entire amount of the overrun – $382 million – was paid from local sources, for a total of $650 million (not including finance charges), over 240% of the originally projected local share of $268 million.[40]

Much of the increase in cost was due to the decision to bring the line directly into the airport proper – where it connects to a people-mover to move passengers around the terminal – rather than extending the now extensive SFO people-mover to a station on the direct line to Millbrae on the West side of the Bayshore freeway (US101). This decision also led to very clumsy operations – both the SFO and Millbrae stations are "one-way" in/out, so the operator has to shift to the other end of the train before leaving – and direct Millbrae-SFO service is no longer operated during normal operating conditions, forcing passengers with destinations at either of these stations to wait for the proper train, and longer headways for those departing these two stations. With minor exceptions for very low ridership periods, BART no longer operates service between these two end stations.

Not only did project costs come in well over what was initially envisioned for this extension, ridership was very far below what was expected. Both the DEIS and FEIS forecasted average weekday boardings of approximately 68,000 by 2010. The first year of operations (2003) saw only 17,965 average weekday boardings. This number grew to only 26,284 by 2007 and has continued to fall far short of the 2010 forecast.[41] Looking at more ridership, BART reported 35,534, 52% of the projection for 2010, in 2012.[42]

The most recent BART ridership report shows that SFO daily boardings were 4,707, ranking 12th of BART's 50 stations, with 2.44% of BART's total boardings[43] -- but still far short of the 2010 ridership projections.

The SFO extension is in many ways closely linked to the Colma Station extension, and it can be difficult to parse out the ridership numbers for these two projects. The predicted ridership levels for Colma according to DEIS and FEIS estimates was to be 15,200 by the year 2000.[44] This prediction came in about 1,500 average daily boardings over the actual numbers;[45] or within 10% of estimates. However, ridership at Colma dropped off significantly after the 2003 opening of the SFO extension, with only 12,664 in 2003 and dropping further to 6,974 by 2009.[46] Apparently the SFO extension cannibalized a large portion of the Colma ridership, a very common outcome when rail lines are extended past an initial terminus station, as most of the riders who formerly accessed the temporary end station by driving, transit, or otherwise change to the new station or station nearer to their trip origin points.

Taking the projections for both the Colma and SFO/Millbrae projects together, we would expect to have well over 80,000 daily riders by 2010, but the most recent projections for 2010 expect only 36,860, and the actual 2012 report was 43,801.[47] Because much of the Colma ridership apparently shifted to the SFO extension upon completion, the 80,000 estimate obviously double counts many of the riders that would utilize any of these stops. While we would not predict that level of ridership now, this double counting did go into the "sales pitch" used to gain public support for the projects and to obtain federal funding.

The Colma and SFO/Millbrae extensions were part of a very complex, three-county agreement brokered by MTC. Alameda and Contra Costa Counties in the East Bay, two of the three original BART counties (the third being the City and County of San Francisco), both wanted extensions to "their" BART lines, but their ridership projections and costs made planners believe that these lines would not meet the criteria for Federal funding at the time. The SFO extension was then believed to be the most viable candidate for Federal funding, but it was in San Mateo County, which was not only not a BART county, but had dropped out of the BART compact before construction began, thus freeing its residents from paying the taxes to build and operate BART. This made it politically impossible for the East Bay politicians to extend BART to SFO in a non-BART county while not extending it to the many residents of the East Bay counties that had been paying BART taxes for years without any service within miles of their homes.

The compromise that was worked out essentially said that all three counties would enact additional half-cent sales taxes for transportation (including many non-BART projects), the Bay Area would apply for FTA funding for BART to SFO/Millbrae, the San Mateo County transportation tax would, in essence, pay for part of the cost of the construction of the extensions in the East Bay and, in return, San Mateo County would not only get a BART extension largely paid for the Federal government, but would also get improvements

to Caltrain, the long-running – but seriously in-need-of-capital investment – commuter rail service from San Jose to San Francisco[48].

In order to make the financial plan pencil out, the assumption was that the high ridership on the SFO/Millbrae extension, coupled with the premium fare charged, would enable this portion of the BART system to operate without subsidies.

Unfortunately, the high fares and other factors acted to drive away riders – and the Millbrae Station, a joint BART/Caltrain station with across-the-platform-transfers, intended to attract Caltrain riders to shift to BART, which was presumed to offer faster and/or more convenient trips to the Market Street employment corridor in the San Francisco central business district, has not proven successful, with only 9,032 average daily boardings/deboardings in FY09[49].

Interestingly, the comparatively smaller investment in improving Caltrain service – which included adding new rolling stock, extensive use of limited stop service to significantly reduce travel times, extension of service South from San Jose, and extensive bicycle storage cars – produced a major increase in Caltrain service and it appears that this is where many of the expected BART SFO/Millbrae riders wound up. With these service improvements, Caltrain is significantly faster to many downtown destinations from Millbrae than BART – and offers one train service, without a transfer, for those potential Caltrain-to-BART transfer passengers originating South of Millbrae. While Caltrain does not serve Downtown directly, there are a variety of transit connections at its terminus, including a light rail line that travels under Market Street, above the BART line, while the BART service takes a wide curve to the West to Daly City before heading Northeast back towards downtown San Francisco, with far more time-consuming station stops along the way. BART service to SFO/Millbrae opened in June of 2003 and the Caltrain "Baby Bullet" service began in June of 2004, both in the last month of the agencies' fiscal years. From 2003 to 2004, the first full year of BART service to Millbrae, Caltrain ridership dropped 1.3%, to 6,625,358 unlinked passenger trips, but the following years, after the "Baby Bullet" service began, ridership increased to 8,120,853 in 2005, 9,004,662 in 2006, 10,264,225 in 2007, 10,914,621 in 2008, and 11,359,225 in 2009 – an overall increase, 2004 to 2009, of 71%. The increase in daily commuter rail boardings exceeded 14,000 over this period. This number is slightly under half of the total boardings and deboardings on the SFO/Colma extension, but should be regarded as a higher percentage because the Caltrain trips are "full," origin-to-destination, trips far longer than the length of the BART extensions, while many of the BART trips are only partly within the extension[50].

The BART Colma/SFO/Millbrae extensions required $1,730 million and had 35,806 daily boardings – many of which were previous BART riders who transferred to a closer station, and most of which only traveled part of their trip on these two BART extensions – in 2009. The Caltrain Baby Bullet had capital costs of $163 million to add 14,000 totally new riders for their entire trip – and significantly sped up the trips of many pre-existing Caltrain riders[51]. While it is very reasonable to believe that a significant portion of these 14,000 added daily Caltrain riders would have taken BART to downtown instead if the Baby Bullet service had not been implemented, it was certainly nowhere near all. Even if we add all 14,000 to the BART extension ridership, this would amount to approximately five-eighths of the 80,000 projected riders for the two BART extensions combined (which, as noted above, may include some double-counting).

Because the SFO/Millbrae extension service was not breaking even on operating costs, the San Mateo County Transit District (SamTrans) was obligated to pay BART for the subsidies. This led to reductions in BART service levels on this extension[52] and these unbudgeted costs had negative impacts on SamTrans riders; chiefly line cancelations, service reductions, and fare increases, although SamTrans has maintained that there is not a direct connection to the BART SFO/Millbrae extension[53].

Again, the above projects are all long since past; too late to do anything about them – except to learn lessons and apply them to the future. The main lesson to be learned is that projections of capital and

operating costs, schedules, and transit system utilization are frequently very wrong; the projections in MTC planning and projection documents simply cannot be accepted at face value.

[36] DOT/FTA, *The Predicted and Actual Impacts of New Starts Projects – 2007*, page 131.

[37] *Ibid*, page 132, 3.

[38] *Ibid*., page 132.

[39] *Ibid*., page 135.

[40] *Ibid*, page 135.

[41] *Ibid*., page 134.

[42] Bay Area Rapid Transit, *BART Fiscal Year Weekday Average Exits* (for 2012), available at: http://www.google.com/url?sa=t&rct=j&q=&esrc=s&frm=1&source=web&cd=4&ved=0CD0QFjAD&url=http%3A%2F%2Fwww.bart.gov%2Fdocs%2Fquarterly_exits%2FFY%2520Avg%2520Wkdy%2520Exits%2520by%2520Station.xlsx&ei=NQY9UtmCGsSlqAGF-ICgDw&usg=AFQjCNFI5up75Y9M43701UhDdXMOL58wug&bvm=bv.52434380,d.aWM

[43] BART, 2024 Ridership by Station

[44] DOT/FTA, *Contractor Performance Assessment Report – 2007*, page 72 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

[45] DOT/FTA, *Contractor Performance Assessment Report – 2007,* page 72 (available at: http://fta.dot.gov/publications/publications_9204.html, accessed November 3, 2010).

[46] http://www.bart.gov/docs/WeekdayExits.pdf

[47] Bay Area Rapid Transit, BART Fiscal Year Weekday Average Exits (for 2012).

[48] MTC Resolution 1876, "Regional Rail Agreements," March 24, 1988.

[49] http://www.bart.gov/docs/WeekdayExits.pdf

[50] National Transit Database, "Profiles" for Caltrain for years cited, accessed November 8, 2010: http://www.ntdprogram.gov/ntdprogram/data.htm

[51] Metropolitan Transportation Commission, "Baby Bullet Trains Debut," June 2004, accessed November 8, 2010: http://www.mtc.ca.gov/news/info/baby_bullet.htm

[52] Michael Cabanatuan, "BART's Directors Approve Plan to Trim Service to S.F. Airport," San Francisco Chronicle/SFGate.com, August 12, 2005, accessed November 8, 2010 http://articles.sfgate.com/2005-08-12/bay-area/17384394_1_samtrans-bart-directors-blue-line

[53] Edward Carpenter, "SamTrans Struggles with Fiscal Woes," San Francisco Examiner, July 27, 2006, accessed November 8, 2010: http://www.sfexaminer.com/local/samtrans_struggles_with_fiscal_woes2006-07-27T09_00_00.html

Response I28-23

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-24

Sonoma-Marin Area Rail Transit (SMART)

The original proposal, to operate what was originally known as commuter rail, but is now defined by the Federal Transit Administration as "hybrid rail54," on the Southern segments of the Northwestern Pacific Railroad, has been active in Marin and Sonoma Counties for decades.

Originally, this effort was led by the Golden Gate Bridge, Highway and Transportation District, which began buying segments of the then abandoned line from the Southern Pacific Railroad in the early 1990's, but this responsibility was transferred from Golden Gate over two decades ago.

What is now known as SMART, and the funding that was to pay for its construction and operation, was approved by the voters of Marin and Sonoma Counties – after previous failures –at the November 2008 election.55 The plan was for a 70-mile, fourteen-station rail line from Cloverdale in Sonoma County South to the Larkspur Ferry Terminal in Marin County, to be fully operational by 2014, with 66% of a parallel bicycle/pedestrian pathway completed by 2014 and the rest by 2029, funded primarily by a one-quarter-

cent two-county sales tax, to cover the projected $449.8 million rail and $90.6 million bicycle/pedestrian pathway construction costs (in 2008 dollars, total of $646.5 million in year-of-expenditure dollars) and annual operating and maintenance costs of $19.3 million (2008 dollars) 56.

To provide additional levels of assurance as to the practicality of the plan to the voters, SMART commissioned a series of "White Papers," including White Paper No. 18, "SMART's Financial Plan," in which Dr. Robert Eyler, director of the Center for Regional Economic Analysis at Sonoma State University, describes the 20-year funding plan as "Reasonable and conservative57."

However, the plan began to crumble almost before the election returns were certified. A combination of sales tax revenues significantly less than what had been assumed prior to the economic collapse, failure to prepare proper construction cost estimates based on through analysis of site conditions and requirements, and other issues quickly produced a shortfall that, despite major efforts to access new funding sources, use innovative financing, and reduce costs without major changes in the program, were far from successful.

This forced a shift to a reduced plan is to open a 38.5-mile, nine-mile line between Santa Rosa–Railroad Square in the North and San Rafae–Downtown in the South, omitting the Larkspur Ferry and five stations on the planned Northern end of the line, with service beginning late 2015/early 2016. The cost of Phase I was projected to be $360 million[58].

By default, the remaining portion of the originally planned system, and major segments of the bicycle/pedestrian pathway, were to be completed when funding allowed – a process that is still a work in progress today.

Today, SMART's major problem is trying to convince the Sonoma and Marin County electorates to approve the extension of the sales taxes to continue to operate it after the tax expires in 2030; an earlier attempt to do so failed, in large part due to the failure to build the full promised rail line and bike/pedestrian feature and the low ridership.

[54] Federal Transit Administration, National Transit Database, 2012 Reporting Manual, "Mode," pages 42-43 and 46, accessed May 9, 2013: http://www.ntdprogram.gov/ntdprogram/pubs/ARM/2012/html/2012_Reporting_Manual_Table_of_Contents.html

[55] Some of the earlier proposals were astonishingly incompetent.

In 1998, I was engaged by the Environmental Defense Fund to study the then-current proposal for SMART, "Sonoma-Marin Multi-Modal Transportation and Land-Use Study – Working Paper #3, Preliminary Capital & Operating Cost Estimates, *Rail System Technical Addendum*, January 31, 1997, the "86 Train a Day" plan, among other things:

1. Proposed operating the line with ten-minute headways (six trains per hour), peak hour, peak direction, which was impossible with bi-directional service on the single-track line.

2. In a service variation, discussed operating twenty-minute headway service in the peak direction and thirty-minute service in the off-peak direction, which would have also been impossible on the single-track line – and if attempted, could have resulted in a head-on collision between the second South-bound train and the first North-bound train.

3. The ten-minute headway service alternative was to have been operated with three-car consists, which would mean 18 rail cars arriving at the then-Southern terminus at Larkspur during the peak hour. This operating plan also had reverse commute service on a twenty-minute headway with two car trains, which is six cars an hour, peak hour, departing Larkspur. However, there was no maintenance or storage facility at Larkspur, which meant that there would be no place to store the arriving vehicles that were not turned back North, twelve trains in that peak hour.

4. While it would not have been possible to operate the service proposed, the number of vehicles required to operate it was undercounted, so it would not have been possible to operate the service even if difficulties of operating bi-directional service on a single-rack rail line at short headways could have been overcome.

5. In general, the document showed a very disturbing lack of understanding of what is required to operate single track passenger service, particularly in regard to the required number and placement of passing tracks and stations.

6. The level of service proposed to be provided – up to 86 trains a day – was astonishingly high, particularly in comparison to the currently planned fourteen round-trip trains per day, all two-car trains (SMART, "What is SMART?," accessed May 9, 2013: http://www2.sonomamarintrain.org/index.php/what_is_smart/)

Source: Thomas A. Rubin for Environmental Defense Fund, "Sonoma/Marin Land Use And Transportation Study – Rail Operations Plan (86 Trains Per Day), May, 1998."

[56] SMART, Smart Project Funding Plan, July 2008, pp. 5, 8, 9, and 22: http://www2.sonomamarintrain.org/userfiles/file/Funding%20Plan%20-%2007-15-08%20Final%20Version.pdf

[57] SMART, "SMART's Financial Plan:" http://www2.sonomamarintrain.org/userfiles/file/18_whitepaper_financial.pdf

[58] SMART, "Overview:" http://www2.sonomamarintrain.org/userfiles/file/18_whitepaper_financial.pdf

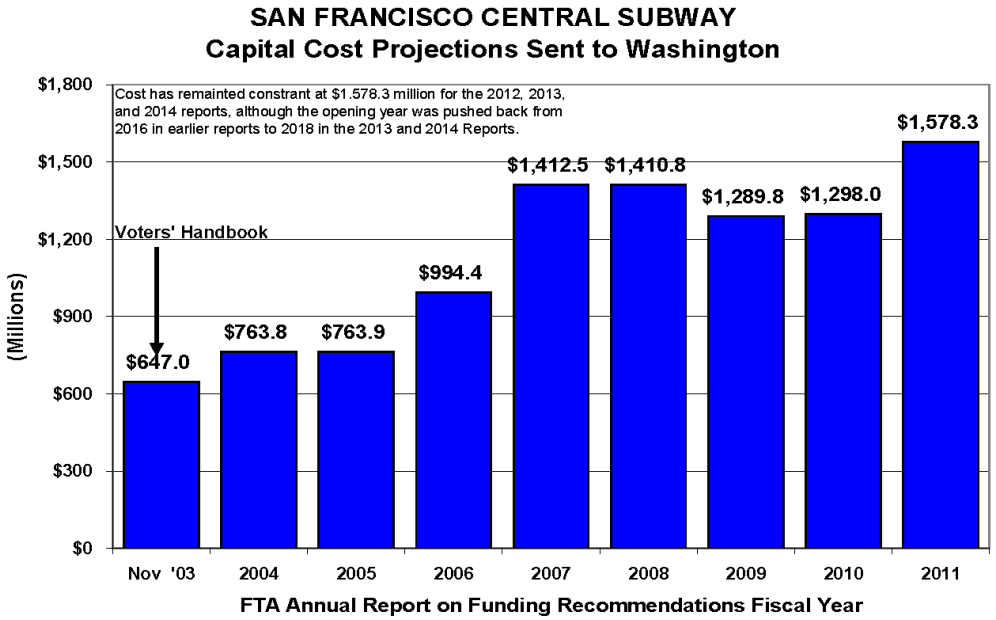
Response I28-24

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-25

San Francisco Central Subway

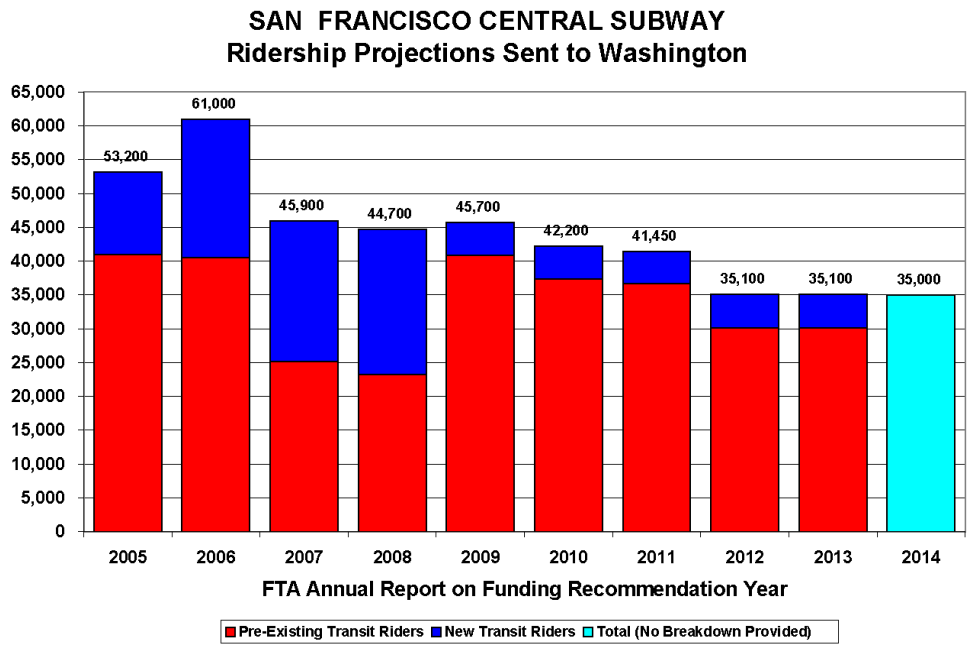
For this project, graphs are the best presentation of showing how that has been told to funding agencies and the public has changed over time – and how the actual results have badly failed to meet the promised outcomes in cost, schedule, ridership, and travel-time savings.



All data in this section, unless otherwise specified, is from the U.S. DOT/FTA series, *Annual Report on New Starts*[59]. As can be seen above, the projected capital cost – for this 1.7-mile, three station project, including procurement of four vehicles, and without any costs for maintenance and operating facilities – increased from the $647.0 million cost presented to the voters for approval by 144% to $1,578.3 million (approximately $928 million per mile) from what was submitted to the voters in 2003 to the immediate pre-construction costs reported to the Federal government – and have gone up significantly after construction got underway.

The costs to complete the project presented in reports to Congress and FTA have not changed since 2009, even though the start-up date was pushed back two years, the scope has been altered to include the Pagoda Theater tunnel boring machine option, and the station construction contract has evidently come in $90 million over expectations.

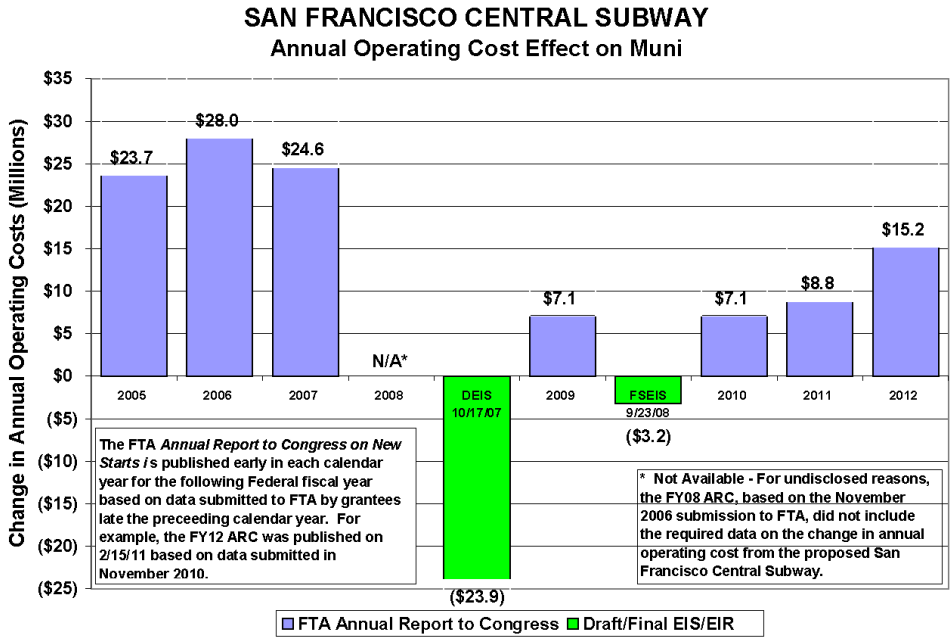
Actual total cost is now expected to be approximately $1.9 billion – there are major water intrusion issues, that required a 17-day shutdown and $6.5 million for repairs[60].



We have also seen an interesting progression of projected ridership over time, with the latest projection, 35,000 daily riders, at 57% of the 61,000 that was promulgated in 2006, when the project was far from approved.

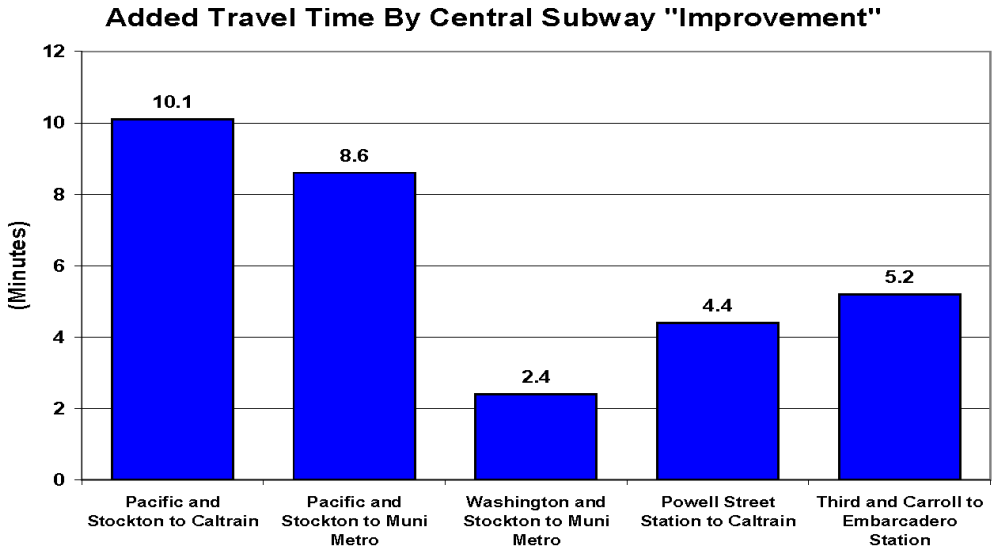
The portion of new riders has also dropped significantly, down to approximately one-seventh of total riders, down from almost half in the 2008 report.

When the Central Subway finally opened in 2023, ridership was only 15,000 – although, to be fair, at that time, the entire transit industry was only about one to two years into recovery from the worst of the COVID downturn. However, by early 2025, it had only reached about 22,000 daily[61].

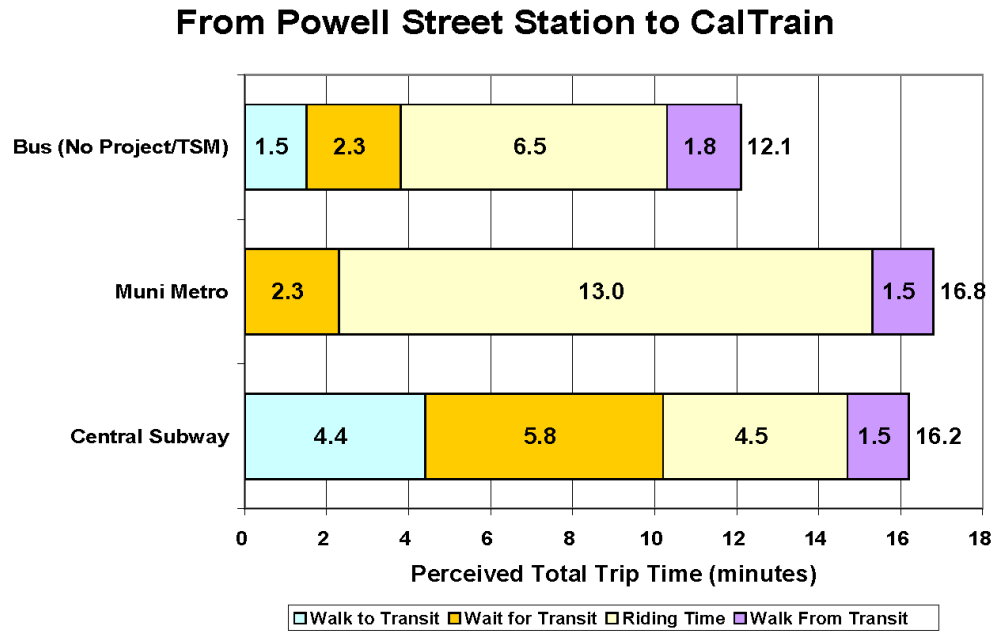


The projected financial impact on MUNI operations has also varied widely from year to year and from presentation to presentation.

Amazingly, the construction of the Central Subway had the – unmentioned – impact of making transit passenger travel times longer for many previous riders.



Finally, the Central Subway appears to have a serious deficiency as a transit improvement – it appears that the travel times – particularly the all-important perceived travel times – will increase for many heavily utilized origin-destination pairs. The above table summarizes, and the one below details, the differences.



Although this $1.5+ billion-dollar project was, of course, presented to the voters as a transportation improvement, the strange workings of the changes to the networking of lines, coupled with the poor connectivity of the Central Subway to Market Street, evidently increases the perceived travel time from present day for many major trips[62].

Central Subway was scheduled to open for revenue service in 2018, but was delayed – due to a variety of issues – to limited service in 2022, and with full service, as part of the T Third Line, in January 2023.

Again, it is far too late to object to the Central Subway project, that is water over the dam – and, in this case, down the wall and into the track bed. This case study is presented to show once again that the Bay Area transportation infrastructure community produces projections of costs, schedules, and ridership that simply cannot be relied upon – and, the greatest variances between projections and actual are generally from the earliest projections – which is current status of so many of the long-term projects now in the RBA2025+ project list.

[59] *The Annual Report on New Starts* is published annually, generally according the following schedule:

1. Grant applicants/recipients submit their reports to FTA in November of each year – for the 2014 report, November of 2012.
2. The various reports from grant applicants/recipients are compiled by FTA staff and, along with other data, is generally published in the Spring; for the 2014 report, the Spring of 2013.
3. The report is the recommendation for expenditures for the upcoming fiscal year – 2014 in this case. http://www.fta.dot.gov/12304_2618.html

[60] Joe Eskenazi, "The Central Subway has been shut down. Will anyone notice?", *Mission Local*, March 3, 2025, The Central Subway has been shut down. Will anyone notice?

[61] *Ibid*.

[62] Travel time analysis performed by Howard Strassner, civil engineer (retired).

Response I28-25

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. Please refer to Response I28-13 and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation."

Comment I28-26

Other Major Projects With Significant Issues

One more time – these case studies of past failures and not intended to focus on these past projects, but to demonstrate a long and consistent pattern of the Bay Area transportation infrastructure community inability to properly access needs, plan responses, identify options and select the best alternative, and plan, design, construct, finance, maintain, and operate them.

MTC is not solely responsible for any of these (with one exception, its own headquarters building), but it is the regional agency responsible for coordination and plan and project approval. In addition, PBA2050+ and the PBA 2050+ DEIR are most certainly not solely an MTC matter, but every transportation and many other infrastructure projects throughout the Bay Area. The failure to properly conduct these past projects is an indictment of the entire Bay Area government infrastructure and operations community which calls the entire planning process and plans into great question and demands an entirely new process to produce the PBA2050+ that the residents, taxpayers, voters, travelers, and visitors require and deserve.

Response I28-26

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-27

Bay Bridge Eastern Span

While there had been concerns about the seismic safety of the Eastern, cantilever span of the Bay Bridge, only minor activities to strengthen it had been implemented prior to the 1989 Loma Prieta earthquake. The

quake caused a section of the upper deck to slip off its support and one side of the loosened section to fall diagonally from the other end on to the lower deck, crushing one very unfortunate driver.

It took a month for the rapid response to this emergency to complete the repair so the Bridge could be reopened. The loss of what is very arguably the most important component of the entire Bay Area transportation network caused huge problems, which, fortunately, were partially addressed from BART ridership hitting all-time highs.

The loss of the Bridge, even for a month, caused huge concerns, particularly when the detailed failure analysis reported the loss could have easily been far more series, entirely taking out both decks, or worse. The Loma Prieta earthquake, while certainly a major quake, was far from "The Big One" in power and impact.

The first fix proposal was to revise, renew, and strengthen the existing Eastern Span to protect it from more serious earthquakes and was estimated to have a cost of approximately $200 million.

However, at this cost, the "new" Eastern Span would have wound up essentially looking the same as the "old" Eastern Span – and that was a problem.

The $200 million retrofit was soon rejected as stopgap, in favor of total replacement that would provide a higher level of earthquake safety and longer useful life. The first replacement project was a quite workable – but hardly visually distinctive – viaduct: structurally similar to the historical East Span, vertical columns supporting precast horizontals. The cost of $1.085 billion was the major consideration, but the relatively fast and simple, all well-known construction methods, low risk, lower impact on travel across the Bay aspects were what sold the engineers.

However, in the Bay Area, the East Bay communities, centered on Oakland, have long suffered with a younger child/"Mommie-always-like-you-best" complex. San Francisco got the five-tower/four-span/engineering-wonder-of-the-world that was in every movie ever made about the Bay Area (including Dustin Hoffman driving his convertible to Berkeley on the upper deck of the West Span suspension bridge in The Graduate) – and Oakland got the ugly duckling cantilever section.

This was Oakland's literally once-in-a-lifetime opportunity to get even – and, it took advantage of it. The "Brown Brothers" – Mayor Jerry of Oakland, with the great assistance of Major Willie of San Francisco, made sure of it.

I'll leave out the details of the intermediate steps that went through multiple designs and ever more political disputes, bids coming in over budget, disputes about use of non-U.S. materials, and construction missteps, and just skip to what was actually built – for $6.5 billion.

The Bay Area couldn't afford this, so, even with a major toll increase to handle part of the added cost, so the State had to shoulder a major share of the added cost.

What is different about this project is that, unlike ever other project on this list (except the MTC Headquarters), MTC had a major direct role in the design decisions and control of the project. For more details, see the *Lessons Learned Report*[63].

The six-time cost escalation from the $1.085 billion for the "basic" bridge, and the problems that led to the delays and the requirement for the State financial bail-out have a lot more of MTC's direct fingerprints than any of the other projects discussed here (except the MTC Headquarters Building).

[63] Karen Wang and Jeff Watson for HNTB Corporation, Ken Jong *et al* for Parsons Brinckerhoff, for Caltrans, *San Francisco-Oakland Bay Bridge: New East Span Project – Lessons Learned Report*, Final Report May 2014, 28795.pdf

Response I28-27

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. Please refer to Response I28-13 and "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities."

Comment I28-28

BART to San Jose

This is currently the biggest transit project, by cost, in the Bay Area – and it has been in one stage or another of planning and design for decades.

(In the following discussion, important variations to keep in mind:

1. Over time, the implementation of the proposed BART to San Jose has shifted from a single project from the BART Warm Springs Station at the Alameda/Santa Clara County line to San Jose to two separate projects, BART to Berryessa and from Berryessa to the terminus

2. The terminus has changed from San Jose to San Jose airport and now to Santa Clara

3. BART to Berryessa has been completed and opened for service in June 2020, at a capital cost of $2.3 billion)

As a CPA, and world-class anal-retentive (but I repeat myself), I catalog and retain many historical Bay Area planning documents and reports, which, in their entirety, provide a detailed, and most interesting, chronological history of this project, including:

- MTC, Amendment to San Francisco Bay Area 2001 Regional Transportation Plan – RTP Strategy to Increase Regional Transit Ridership, 2001 RTP – Committed Funding and Track I Investments, page 5 of 6, RTP Reference Number 21921, BART Extension from Warm Springs to San Jose -- $3,710.0 million)

- U.S. DOT/FTA, Annual Report of New Starts – Proposed Allocations of Funds for Fiscal Year 2004, 2003, page A-429, Silicon Valley Rapid Transit Corridor, Warm Springs to Norman Y. Mineta International Airport, 16.3 miles and seven stations, capital cost of $4.77 billion

- Annual Report 2005, page A-357, change of capital cost to $4,997.8 million

- Annual Report 2006, page A-179, change of capital cost to $6,151.3 million

- Does not appear in 2007-2012

- Annual Reports 2013-17, (no page number), "Silicon Valley Berryessa Extension Project," 10.2 miles, 2 stations, capital cost $2,330.02 million

- Annual Report, 2018, (no page number), "BART Silicon Valley Phase II – Extension to San Jose and Santa Clara, 6.5 miles and five stations, capital cost $4.78 billion

- Annual Reports, 2019-2021, (no page number), change of capital cost to $4.69 billion and start of revenue service in June 2026

- Annual Report, 2022, (no page number), change of capital cost to $6.941 billion and start of revenue service in 2030
- Annual Report, 2023, (no page number), change of capital cost to $9.148 billion and start of revenue service in June 2034
- Annual Reports, 2024-25, (no page number), change of capital cost to $9,317.61 million and start of revenue service in March 2033
- Annual Report, 2026, (no page number), change of capital cost to $12,745.61 million and start of revenue service in February 2039

Adding the cost of Berryessa Extension to the most recent Phase II estimate produces a total over $15 billion – even considering that there are significant differences in the years of these costs (that cannot easily be identified), the increase from the earliest $3.710.0 billion is almost four times.

The schedule slippage for Phase II revenue operation is equally shocking. Not only has the 2021 projection of revenue service in June 2026 (five years) long since become inoperative, the 2026 projection for 2039 start-up is thirteen years out from the fiscal year of the report date; in five years of annual reports, the start date has been pushed back ***thirteen years***. If the subject was not related to the remarkable demonstration of lack of control over public expenditures, that could actually be the set-up line for a very bad joke.

Response I28-28

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. Please see Responses I28-3, I28-6, I28-13, and I28-19.

Comment I28-29

All the projects I have listed in this section show disturbing outcomes in terms of poor project conception, failure to cancel projects after it has become clear that their times have come … and gone, remarkably poor cost and schedule control, construction quality concerns, and ridership below the projections used to justify the projects and sell them to the voters.

That said, in this rouges' gallery, this is without any doubt the worst example of the failure of the Bay Area transit community to property manage a major project. How can MTC, as the coordinator, overseer, and facilitator, and the statutorily-designated

Response I28-29

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. Please refer to Response I28-13.

Comment I28-30

Caltrain Electrification

The Caltrain electrification project, originally budgeted for $1.978 billion, incurred overruns of $462 million[64], over 23%.

Again, this is presented not to critique a project that has been completed, but to provide still another case of the inability of MTC, and the Bay Area transit and general government community as a whole, to properly

plan, design, cost-project, and manage major transportation capital projects, which calls into doubt similar cost and related projections in PBA2050+ and the OBA2050+ DEIR.

[64] Caltrain, "Cost of Caltrain Electrification Increases, Project on Track for 2024," December 6, 2021, Cost of Caltrain Electrification Increases, Project on Track for 2024 | Caltrain

Response I28-30

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Please note that Plan Bay Area 2050+ includes planning-level project and funding assumptions and recognizes that many implementation actions depend on future decisions and funding availability. The plan may be updated and revised over time as project funding and implementation conditions evolve. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" and "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan funding and revisions.

Comment I28-31

Salesforce Transit Center

On this series of case studies, I have been very clear that MTC's role in most of them has been as the regional planning, funding, coordination, and oversight entity, but not as the responsible project manager or owner. In many of these case studies, there has been one main player, generally the project owner and manager, responsible for the project from conception to operation – with, in most cases, numerous other agencies having various degrees of interest and involvement in a variety of ways.

The Salesforce Transit Center, conversely, had – and has – a very large number of entities have been involved in very many ways with only a relatively weak lead agency. So, unlike most of the other cases, which were offered as evidence of MTC's inability as the regional planning/ funding/approval agency to keep a project from getting out of control and producing bad outcomes, this one is offered to show that the various governmental and related parties in the Bay Area only appear to be able to move forward on such projects under the "Christmas Tree" methodology – no one can say yes, but many people can say no, so the only way that anything ever gets approved is if there is a big present under the tree for everyone. Unfortunately, the Christmas Tree methodology frequently does not produce very good outcomes for the Bay Area residents, voters, taxpayers, and travelers, or those from other areas that are traveling to or through the Bay Area.

The 1989 Loma Prieta earthquake (also known as the "World Series Earthquake" as it hit just before the opening pitch of the third game between the Oakland Athletics and the San Francisco Giants at Candlestick Park) revealed serious seismic safety issues for the Transbay Terminal.

The Transbay Terminal opened in 1939 as the San Francisco terminus of the Key System streetcar lines coming directly into San Francisco over the newly opened Bay Bridge. After the demise of the Key System transbay rail service in 1958, the Transbay Terminal was significantly restructured to became the terminus for the AC Transit transbay bus service that replaced it, plus other long-haul public and private bus service into San Francisco and intercity bus service. While AC's transbay ridership fell significantly after BART under the Bay opened for service in 1974, Transbay Terminal was still serving five figures of riders as late as the pre-COVID transit downturn in 2019. In addition to non-San Francisco-centered transportation agencies in the terminal proper, major Muni lines also served the surrounding streets, which eased passenger transfers.

Post-earthquake, and given the huge damages to other key components of the Bay Area transportation network, the decision to "fix" the "what now?" Transbay Terminal question followed quickly – but the methodology to do so took many years.

A relatively quick structural/seismic survey showed that it would be possible to upgrade it for decades of safe use. The cost – in the tens of millions – was not minor in absolute terms, but turned out to be a fraction of the costs of the Salesforce Transit Center.

However, the attitude of the local leadership was predominantly not to just make 1930's and other old infrastructure seismically safe, but replace it with major new facilities for the modern day, such as what was done for the East Span of the Bay Bridge and the I-880 Cypress Street Viaduct. This led to the decision to build an entirely new downtown San Francisco transit terminal, but with significantly upgraded capabilities – including to use it as the center of major new central business development.

It took over two decades after the earthquake for the demolition of the Transbay Terminal to begin at the end of 2010, but construction of its replacement was then just beginning, so a temporary Transbay Terminal started operations in the late summer of 2010.

The Salesforce Transit Center design combined structure included a base covering two city blocks with the new bus terminal occupying a full floor, but also retail, restaurant, and entertainment spaces and a large public park as the roof. In the subbasement was the provision for Caltrain commuter rail service from the Peninsula and California High-Speed Rail service, also coming up the CA101 corridor from San Jose and Gilroy, and potentially other service, including a "standard gage[65]" rail tunnel to the East Bay for Capital Corridor, Amtrak, Amtrak California, and/or ACE service into San Francisco.

The City granted Salesforce height exceptions to allow it to build its trophy-class headquarters as the tallest building in the U.S. west of Chicago – in return for the ability to have a higher tax levy in this district. The Salesforce office building is directly linked to the Transit Center, but with separate main floor entrances. As part of the deal, Salesforce paid $110 million for the 25-year naming rights for the Transit Center.

Bus service to the Transit Center was originally scheduled to begin by the end of 2017, but this was delayed until August of 2018. However, six weeks after, two serious cracks were discovered in the supporting beams supporting the "third floor" bus level over Fremont Street[66] and transbay and other bus service had to be redirected back to the temporary Transbay Terminal. After investigation, redesign, and repairs, bus service restarted to Salesforce Transit Center in July of 2019.

The cost of the Transit Center (which is entirely separated from the private-sector Salesforce Tower office building) was over $2.2 billion – this is approximately 50 times the cost of a seismic update to the original Transbay Terminal, but the replacement is far more grand and has far more features; the original was rarely ever described as a "tourist destination" for anyone except visitors catching a bus out of town.

The operating costs and revenues of the Transit Center was done with the assumption that there would be significant rail traffic on the bottom level; as this is still far (if ever) from happening, the operating loss could reach $20 million/year.

While the rail level is ready to be built out for operation, at the present time, it is an empty shell – no rail, no propulsion power, no signals, etc.

However, the cost of this extension, known as the "Portal" and "DTX" (for "Downtown Rail Extension") varies significantly depending on which of the many alternative alignments that have been proposed; as currently proposed, it is 2.2 miles from the existing Caltrain terminus at Fourth and Townsend to the Transit Center – has been increasing over time. In 2016, the capital cost was projected as $3.9 billion, up

to $6.5 billion in late 2022 to $8.25 billion in 2023 (including $729 million for the transit "box" on the bottom level, which has already been completed).

I'm an accountant, by training and practice, have been for well over a half century, and am very proud of that. However, one frequent criticism I have heard of accountants is that, "Accountants know the cost of everything and the value of nothing."

Well, I could argue with that, but, for the instant purposes, the costs of the Salesforce Transit Center are well established and known, and the costs for the DTX have been promulgated by its proponents, as established above.

Rather than commenting on "value" myself, I'll just ask – what is the value of extending Caltrain (and potentially California High-Speed Rail, assuming it has some chance of ever actually being built to and through the Bay Area, which is quite questionable) 2.2 miles from its existing Four and Townsend terminus, which has a number of excellent transit options to destinations all over the San Francisco central business district?

Is there value in spending another $7.5 billion on top of what has already been spent?

Assuming, of course, that is the final cost projection and the actual final cost to construct – if it ever gets that far.

Again, this case study is not presented to show that the Salesforce Transit Center history and the proposed Portal/DTX are deficient for their own sake; they are being presented to show still one more example of how MTC has demonstrated, by the outcomes, that it cannot properly plan proper transportation capital projects and, therefore, the projections of project costs in PBA2050+ and the PBA2050+ DEIR are not credible and the extent of past failures are sufficiently large to call these documents into question.

[65] The overwhelming majority of steel-wheel-on-steel-rail rail service in the U.S. operates on a 4' 8½" gage; BART operates on an incompatible 5'6" gage. BART trains receive their 1000v propulsion power through a "third rail," while almost all electrified commuter/inter-city rail is 20,000-30,000 volts delivered through an overhead catenary.

Existing intercity/commuter rail in California was all non-electric propulsion power until Caltrain's recent electrification – with overhead catenary delivering power at a nominal 25,000 volts.

California High Speed Rail (hereinafter "CaHSR") is also specifying 25,000 volts, also delivered through overhead catenary (which will allow Caltrain and CaHSR to operate on the same track on the Peninsula.

As it would be very impractical to operate several miles of underground/underwater rail service between the approach to the Salesforce Transit Center and the East Bay with internal combustion propulsion, operating BART service with 1,000v delivered through a third rail connecting on the lower side of trains on a 5'6" gage AND commuter/intercity/HSR on a 4'8½" gage at 25,000v delivered through an overhead catenary, with complex train switching special track work, on the same rail track, may be theoretically possible as an engineering design exercise, but unlikely to be practical in the real world of rail operations heavy daily wear, heavy daily maintenance, and safety as the prime requirement environment.

BART actually studied a single tunnel approach for two different types of trains as part of its Link21 process funded through its 2016 Measure RR $3.5 billion bond ballot measure , but ultimately determined that a two-tunnel approach would be required if both modes were to be operated under the Bay (and there was a need for more BART capacity, which was a major concern when the Link21 program was originated in the second decade of the 21st century). After expenditures well into nine figures, the Link21 program has produced little in the way of actual plans and appears to be largely on hiatus – after commenting that the second BART tube did not appear to be justified at this time. (The "21" in "Link21" refers to the nine Bay Area counties and 12 adjoining counties.)

In fact, with the huge COVID reductions in ridership for BART, Caltrain, and other long distance Bay Area rail transit modes, with rail recovery proceeding very slowly, news about what is going on with Link21 has been very quiet for many months.

[66] This problem was assigned to the construction contractor failing to follow the City code for welding and this failure not being detected by inspectors, which led to micro-cracks, which led to major cracks.

Response I28-31

Please refer to Response I28-3.

Comment I28-32

MTC Headquarters Building

While MTC is the oversight, coordination, and funding entity for most the projects described above, MTC – both as MTC and through its alter ego entity, the Bay Area Headquarters Authority – has the main responsibility for all aspects of the purchase and modifications for its own headquarters facility, the Bay Area Metro Center at 375 Beale Street in San Francisco.

The push to buy this former Post Office Building at the MTC December 2011 evidently came from the then-MTC CEO. This agenda action item appeared to surprise some of the MTC Commissioners at the meeting – where they were asked to act rapidly to make the decision to purchase this building and authorize extensive modifications to it while exiting the long-term MTC/ABAG headquarters in Oakland.

As it turned out, the costs of the modifications went over budget by approximately $91 million[67] to approximately $258 million, an increase of over 50%. There was also a lengthy unanticipated delay in MTC moving in due to problems with trying to make major modifications to meet MTC's specifications, which had a negative impact on the work of a tenant, which was doing complex and sensitive laboratory work which the work was compromising. This caused MTC and ABAG to have to remain at its original headquarters for longer than had been planned, at additional unanticipated cost.

Unlike the former MTC/ABAG headquarters in Oakland, which was across the street from the BART Lake Merritt Station – and could even be accessed without going outside, the Beale Street location is not particularly well served by transit, several long blocks from the BART/MUNI Metro Embarcadero Station. This is a particular difficulty for the many Americans with Disabilities Act transit users who have frequent reason to travel to MTC headquarters.

Again, this matter is presented not to comment directly on this decision, which is now, for better or worse, a long done deal, but to provide an additional case of MTC doing a poor job of doing its job, thereby wasting Bay Area taxpayer (and bridge toll payers) funds that could have been better utilized for other purposes – which, interestingly in this case, included funds that were originally intended for the Bay Bridge Eastern Span construction. This one is 100% on MTC/ABAG; there are no other local governments involved in any way other than ministerially.

[67] Erin Baldassari, "New MTC offices $91 million over budget," San Jose Mercury News, May 20, 2016, New MTC offices $91 million over budget – The Mercury News

Response I28-32

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-33

MTC DERIVATIVES INVESTMENTS

Approximately fifteen years ago, MTC began to invest a significant part of its substantial Bay Area Toll Authority toll and bonding assets into derivative investments. Unfortunately, due to a variety of unanticipated developments, this did not turn out well.

The following is from the MTC Comprehensive Annual Financial Report[68] (hereinafter "CAFR") For the Fiscal Years Ended June 30, 2015 and June 30, 2014, page 12:

> BATA's investment income for fiscal year 2015 decreased by $276,078[69] compared to a decrease of $54,968 in fiscal year 2014. In fiscal year 2015, investment income was comprised of $8,230 of

> investment income and $285,569 of unrealized loss on derivative instruments. The balance of the swaps became ineffective and accounted for $250,217 of the $285,569. In fiscal year 2014, investment income was comprised of $5,807 of investment income and $7,068 of unrealized loss on derivative instruments. The $285,569 and $7,068 loss on derivative instruments in fiscal years 2015 and 2014, respectively, represents a charge for the change in the market valuation of certain interest rate swaps that no longer qualified for hedge accounting as discussed in Note 1.Q to the financial statements. The investment income increased in fiscal year 2015 from fiscal year 2014 mainly due to a higher cash balance on hand from bond proceeds on the new bond issuances.

These investment losses, well into the hundreds of millions of dollars, are presented as evidence to demonstrate that MTC's performance as a government agency is very susceptible to challenge for competence. This is still another reason to call into question MTC's ability to properly prepare long-range transit, housing, and related plans.

[68] These financial reports are now known as Annual Comprehensive Financial Reports. Unfortunately, the pronunciation for the acronym for the former name sounds like a racial slur in Afrikaans, an important local language in South Africa, necessitating the change.

[69] Per page 4, "Except as otherwise stated, all amounts described below are expressed in thousands of dollars." Therefore, this sentence should be read to mean, "BATA's investment income for fiscal year 2015 decreased by $276,078,***000 (change highlighted***), and all other values should also be read as being expressed in thousands of dollars.

Response I28-33

The commenter's statements are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I28-34

SETTLEMENT AGREEMENT

The following is from PBA2050+ DEIR, page 1-13"

1.7.4 2013 Settlement Agreement

> Shortly after adoption of the first Plan Bay Area and certification of the EIR in July 2013, four lawsuits were filed challenging those actions based on CEQA and other California laws. Two of the lawsuits were fully litigated with final trial court judgments in favor of MTC and ABAG, affirmed by the court of appeal. The other two were settled out of court, including the lawsuit filed by the Building Industry Association (BIA) of the Bay Area. The BIA agreement required ongoing obligations on the part of MTC and ABAG in preparing future updates of Plan Bay Area, as set forth in more detail in Table 1-1.

Please provide more detail on the second lawsuit that was settled out of court.

Response I28-34

Please refer to "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" for additional detail on the lawsuit.

Comment I28-35

MTA COMMISSIONERS NEED THEIR OWN DEDICATED ASSISTANTS

My decades of working with metropolitan planning organizations, which have boards that are mainly elected officials from component organizations such as cities or counties, have led to a conclusion that the governing boards of most are actually subservient to the staffs that actually run these agencies.

The various component reports for Plan Bay Area 2050+, printed front-and-back and placed in three-ring binders, occupies 20 inches on a bookshelf – and that doesn't even count other reports that are major contributors to this work. I have spent dozens of hours reading, reviewing, and analyzing these documents – and there are many segments of many of these reports I haven't even skimmed.

Here's my problem – these and other documents are the product of MTC's 400+ employees and uncounted consultants, plus employees of other governmental agencies, many of whom are paid to spend years on individual aspects of these works. But, the MTC Commissioners are all seconded from other positions in organizations, mainly as County Supervisors and Mayors or City Councilpersons, and they simply do not have the time to get into these documents in any degree of detail. I doubt if very many MTC Commissioners have read even ten pages of these documents and I would not be surprised to find that some Commissioners haven't read even a single word.

The information load on Commissioners is overwhelming. If one looks at what is contained in the Agenda package for the Monthly MTC meeting, and adds the same for the meetings of other MTC- and MTC-related entities ABAG, BAHA, BAHFA, BAIFA, BATA, SAFE and committees that each member serves on, the monthly paper would be several inches thick. They simply do not have the time to review even a fraction of this – especially since their home city or county is generating a similar quantity of reports.

For their understanding of what is going on, they are almost wholly dependent upon MTC staff; who do not really work for the Commissioners, but for their own immediate and ultimate superiors. The only external check on what the staff relates to Commissioners is from people like me – who the staff warns the Commissioners about.

The Commissioners need help. They need support staff that work directly and solely for them. Part of their work would be to review the paper, but what is more important is just to understand what is contained therein, what it means, what is there, why – and what is missing. Follow-up with MTC staff and others should follow, as appropriate, as well as being the primary contact point for outsiders that want to petition the Government for a redress of grievances.

My recommendation is that MTC provide for each voting Commission to have a mid-level staffer that works solely for the Commissioner. Each Commissioner shall be the sole selector for their staffer who may, at the option of the Commissioner, be either a MTC employee or a consultant. MTC would pay for the costs of the staffer, including providing, if desired, a private office and would provide the necessary employment/acquisition assistance.

I am extremely hesitant to recommend that MTC increase the size of its staff, particularly because I know full well that, in most cases, the primary work of Commissioners' staffers will be to inquire about and work to advance the "Commissioners'" projects. However, I have spent too many decades watching Commissioners trying to make decisions on complex matters where it is obvious that they have not been properly informed about what is really going on and were not able to get full, adequate, and truthful explanations from MTC staff.

Response I28-35

The commenter's governance recommendations are noted and will be forwarded for consideration. This comment does not identify a specific issue regarding the Draft EIR's environmental impact analysis. Please Refer to Response I28-13.

Comment I28-36
CONCLUSION

For all the reasons discussed above, and far too many more to even mention, the Plan Bay Area 2050+ Draft and the Plan Bay Area 2050+ Draft Environmental Impact Report are fatally flowed and cannot be approved without extensive revision, much of which will have to be close to start-over.

Please do not hesitate to contact me if I can be of any assistance in moving this forward.

Response I28-36
The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I29 Gregg A. Dieguez 1

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I29-1
A. Framing Comment

A Valid Need, Unmet By Plan Bay Area 2050+

This is indeed a most logical time for the Bay Area to create a regional plan to address the multiple crises facing it. A combination of “fiscal cliffs” and “structural deficits” threaten the continued viability of many cities, counties and public works agencies. The Climate Crisis has begun to take a toll in wildfire, flooding, windstorms, and drought. The current federal administration policies of withholding long-established sources of funds, together with the projected California state budget deficits, greatly reduce hope for outside intervention to fund solutions to our manifold problems – at least for several years. Meanwhile, important innovations in energy, telecommunications, and transportation offer hope for more affordable, clean, and agile solutions to some of these problems – if policymakers will allow their adoption.

Response I29-1
The comment expresses concerns about current fiscal conditions, climate-related challenges, and the political landscape. These are general comments and do not address the contents of the Draft EIR. Please refer to “Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources” regarding plan funding.

Comment I29-2
The current draft of Plan Bay Area 2050+ (hereinafter: “the Plan”) deals successfully with almost none of these issues. Instead, the Plan focuses mostly on Traditional Transit and overblown estimates of housing needs, and fails to provide even the funds for the initiatives it proposes, let alone addressing the Fiscal Cliffs faced outside of the Transit and Housing Industrial Complex (THIC). Further, it admits most of the ‘environmental’ impacts of its proposals are Significant and Unavoidable, while also lacking analysis of better alternatives and proposals to address more important priorities outside the limited circle of issues it chooses to address – albeit inadequately.

Response I29-2

Please refer to "Master Response 2: EIR Mitigation Measures" regarding the treatment of significant and unavoidable impacts in the Draft EIR and "Master Response 3: Plan Alternatives" regarding CEQA requirements for evaluating a reasonable range of alternatives to the proposed plan. The comment expresses disagreement with the merits of the proposed plan, reflecting economic and social considerations that are not required to be analyzed under CEQA. Please refer to Response I29-1.

Comment I29-3

Below are some concerns about the DEIR. **The bulk of these issues and questions relate to Mitigation Measure PUF-1, which relies on local governments and agencies for much mitigation and which lists impacts for 35 items as Significant and Unavoidable.**

Response I29-3

The comment raises concerns regarding the Draft EIR's reliance on Mitigation Measure PUF-1 and the number of related impacts identified as significant and unavoidable. Please refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable findings in the Draft EIR.

Comment I29-4

However, because there are so many important <u>omissions</u> in the current Plan and DEIR, it is not possible to link every comment to a current Mitigation Measure. For that reason, we have included a numbered series of questions throughout the text, which are also listed in the Table of Contents.

Response I29-4

The comment is introductory and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-5

1) Question: Will the MTC reissue another Draft EIR with an extended comment period after addressing the deficiencies extant in the current Draft Plan and engagement process?

Response I29-5

CEQA does not require the lead agency to recirculate a Draft EIR unless the agency adds significant new information that deprives the public of a meaningful opportunity to comment on the environmental analysis. As defined in State CEQA Guidelines Section 15088.5, recirculation is required only under the following circumstances:

1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish & Game Com*. (1989) 214 Cal.App.3d 1043).

At this time, the Draft EIR has been circulated consistent with CEQA's public review requirements. See Responses I14-5 and I28-2. All substantive comments received, including concerns about the engagement process, have been addressed in the Final EIR. Significant new information has not been added to the Final EIR and none of the circumstances for recirculation listed above have been met. Therefore, the Draft EIR will not be recirculated.

Comment I29-6

Recommendations for improvements in the plan are imbedded in these comments and are summarized in the last section.

Response I29-6

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-7

B. Methodological Issues Affecting Validity of Conclusions

The Plan modeling is based on a population forecast which is 12+ times higher than likely – 24% vs. 1.9% - and far higher than the expert Demographic Research Unit at the California Dept. of Finance has projected.

By inflating growth projections, the Plan creates an artificial sense of crisis—while ignoring the real issue of affordability. The Plan's population forecast is derived from a jobs forecast… that is untethered to reality. A population forecast based on actual demographic trends would be 1.9%, less than one TWELVETH of the 24% in Plan Bay Area. And there's a real chance the region will decline again, as it has in recent years, due to changes in immigration policy, our unaffordable cost of living, and our aging demographic. A realistic estimate of Bay Area population growth is contained here, with a full description of the demographic method used and a critique of the Plan's approach: MTC/ABAG's Bay Area population projections are way too high. In fact, the Calif. DRU numbers were quite specific in refuting a population growth of 10 million + Californians by 2050. Long term, the population is expected almost flat out through 2060, as shown in their official spreadsheet:
https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P1A_State_Total.xlsx

The Plan forecast estimates regional employment will grow by approximately 1.4 million jobs between 2020 and 2050, reaching about 5.4 million total jobs by 2050. This forecast establishes the total number of jobs expected in the region in the absence of specific land-use or transportation interventions and without causal modeling justification. Regional job totals through 2050 are kept consistent across all scenarios (Proposed Plan, No Project, and other alternatives) with the exception of internal spatial distribution differences. The analytic process is backwards, taking a fixed result, rather than exploring alternatives which create differential job and population growth.

Response I29-7

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth, including its relationship to the Department of Finance population projections. The plan contains a series of land-use and transportation strategies and investments to accommodate the forecasted growth while reaching the region's climate goals. Please refer to "Master Response 3: Plan Alternatives" regarding having consistent assumptions across the alternatives.

Comment I29-8

2) Question: Will a revised Plan align growth assumptions with California Department of Finance (DOF) and Demographic Research Unit (DRU) projections?

Response I29-8

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth in relation to the DOF projections.

Comment I29-9

3) Question: Will a revised Plan consider an alternative with demographically driven population estimates, which may project flat to declining population growth?

Response I29-9

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth and "Master Response 3: Plan Alternatives" regarding alternatives chosen for analysis sin the Draft EIR.

Comment I29-10

And all jobs are not equal; in terms of their income and tax contributions and the transportation burden they create. With remote work options, workers in Bay Area companies are already living in Utah, Texas and other more affordable states. The Plan does not build remote work into its core population or jobs forecast as a structural driver of regionwide workforce relocation; the Plan does not explicitly model or forecast the impact of remote work enabling Bay Area workers (i.e. taxpayers) to relocate permanently to other states or more affordable regions. There is an important dynamic that must be evaluated, and is not, regarding what regional programs grow the fiscal sustainability of the region, and which undermine it.

Response I29-10

Please refer to "Master Response 1: Regional Growth Forecast" for additional discussion regarding the assumptions and methodology of the plan's regional growth forecast. Further, while work from home has increased and will likely stay in our work landscape, there is currently still limited data to base longer-term assumptions on with respect to relocating workers to other regions potentially maintaining an economic relationship with a Bay Area employer. Useful sources include U.S. Census American Community Survey PUMS data, which may hold information about relocating persons, but not on any potential connection to Bay Area employers. MTC staff are tracking the longitudinal U.S. Survey of Working Arrangements and Attitudes (SWAA) data for developing insights into this question as we look to the updated forecast.

Comment I29-11

One of the senior modelers involved in the Plan - Mike Aronson - an author of the Plan impact report, punctuates the unreliability of modeling when given bad, incomplete or biased assumptions:

"*Like all efforts to predict the future, traffic forecasting is not a foolproof science. Senior Principal Engineer and experienced travel demand modeler Mike Aronson emphasizes that a model is only as good as the inputs and assumptions that go into it. "If those assumptions are inflated, the long-range traffic forecasts very often outpace the reality of traffic growth," says Mike. "This is not the fault of the model; it's a byproduct of the land use assumptions*."[1]

[1] https://www.kittelson.com/ideas/myth-busters-are-long-range-traffic-forecasts-the-best-tool-to-guide-decisions-about-our-streets/

Response I29-11

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Please note that CEQA requires that environmental analyses rely on reasonable, evidence-based assumptions and the best available data at the time of preparation. State CEQA Guidelines Section 15144 states that "Drafting an EIR or preparing a Negative Declaration necessarily involves some degree of forecasting. While forecasting the unforeseeable is not possible, an agency must use its best efforts to find out and disclose all that it reasonably can." For this analysis, changes in VMT in the Draft EIR are based on travel forecasts developed using the MTC's activity-based travel demand forecasting model, known as Travel Model 1.6 (see Section 2.3.3, "Analysis Tools" of the Draft EIR). The assumptions in the forecast were developed based on best available data at the time of the analysis.).

Comment I29-12

Studies of Metropolitan Planning Organizations (MPOs) in California and other states have found that long-range forecasts frequently overshoot actual population and employment growth, leading to transportation demand models that justify larger infrastructure projects. This matters for the following reasons:

Funding Incentives: MPOs that project higher growth can justify larger capital programs, which makes them more competitive for discretionary federal grants.

Transparency Gap: Unlike fiscal audits, MPO demographic forecasts are rarely subjected to independent verification, leaving local governments and residents with little recourse when projections prove inaccurate.

Policy Risk: Overestimated growth can lock regions into overbuilt infrastructure, higher debt loads, and misaligned land-use policies.

We need to avoid those risks, and that requires additional analysis before outlining multi-billion-dollar social investments.

Responsible planning must use real numbers, or "risk(s) eroding public confidence," as state Auditor Michael S. Tilden wrote in his March, 2022 assessment of RHNA numbers' methodology. "*As directed by the Joint Legislative Audit Committee, my office evaluated the Regional Housing Needs Assessment ...Overall, our audit determined that HCD does not ensure that its needs assessments are accurate and adequately supported...This insufficient oversight and lack of support for its considerations risks eroding public confidence...*" [2]

[2] https://information.auditor.ca.gov/reports/2021-125/index.html

Response I29-12

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. CEQA does not require the EIR to validate the proposed plan's regional growth forecasts or consider the costs of implementing the proposed plan. The Draft EIR evaluates the potential environmental impacts of implementing the proposed plan based on the plan's regional growth forecast. Please refer to "Master Response 1: Regional Growth Forecast" for additional discussion regarding the assumptions and methodology of the plan's regional growth forecast.

Comment I29-13

Lastly regarding the population estimate, any serious planning exercise must envision a scenario wherein Bay Area population growth is flat or negative – as in recent years. And the plans must be sensitivity tested and adjusted for those alternative scenarios, rather than intransigent insistence on the same population and jobs numbers in all scenarios.

Response I29-13

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

As discussed in Section 4.3, "Alternatives Selected for Detailed Analysis," each of the alternatives is constrained by the same planning assumptions as the proposed plan; maintains the same regional growth forecasts (i.e., population, employment, households, and housing units); and maintains the same forecast of reasonably available transportation revenues. These planning assumptions are considered exogenous factors and ensure the alternatives analysis provides an "apples to apples" comparison with the proposed plan. Please refer to "Master Response 3: Plan Alternatives" for a discussion regarding the level of growth assumed across alternatives.

Comment I29-14

4) Question: Will a revised Plan derive jobs and personal income forecasts from causal factors, rather than plugging a desired jobs number into all scenarios?

Response I29-14

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted demographic and economic changes.

Comment I29-15

5) Question: If the forecasts for population, jobs, and transit ridership are biased and overstated, how can the MTC properly analyze the program/project DEIR relative to CEQA established thresholds of significance?

Response I29-15

The Draft EIR uses the adopted regional modeling framework and disclosed assumptions to evaluate impacts consistently across the proposed plan and alternatives. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plans forecasted growth and responses I29-10 through I29-13. In addition, please see Response I28-10 and Response I28-11 regarding transit ridership forecasts.

Comment I29-16

C. Analytical Gaps, Bias, and Policy Misalignment

1. Omission of Critical Services and Requirements

Even more important than the flawed jobs and population estimates is what the Plan omits. It fails to begin with an audit of the fiscal sustainability of the region: cities & towns, public works, schools, hospitals, as well as transit systems – all of which are under fiscal stress. Lacking that baseline audit, the Plan is clueless as to the size of competing priorities for funds. Many cities are in fiscal stress with so-called 'structural deficits', and require more funds just to continue services. As many of the topics and mitigation issues in the Plan and DEIR are delegated to local jurisdictions for resolution, the Plan is untethered to reality in expecting towns and public works agencies to handle more growth and mitigation projects.

Note also that this planning process began before California's recent infrastructure grade of "C-". Without concentrating on failing infrastructure, our regional is unsustainable.[3]

A major determinant of the success of any plan will be the economic vitality of the region. Yet this was deemed outside of scope by the planners: "Economy revenues have not been inventoried for this plan due to MTC and ABAG's lack of authority, financial resources and technical capacity."[4] How can this plan assess the payoff of at least $1.5 Trillion in spending if it can't attribute investments to economic outcomes?

6) Question: Will the MTC expand its analysis to model the regional economic payoff on the proposed Plan investments?

[3] https://www.asce.org/publications-and-news/civil-engineering-source/society-news/article/2025/12/03/asce-california-section-releases-infrastructure-report-card

[4] Draft Plan Bay Area 2050+, Section: Definitions of Revenues for plan elements, page 43.

Response I29-16

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. CEQA does not require the EIR to consider fiscal sustainability. Social and economic effects are not significant effects on the environment under CEQA (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560 [findings that the decision to approve a project with social impacts represents "a political and policy decision" and not "an environmental issue for courts under CEQA."]; *Melom v. City of Madera* (2010) 183 Cal.App.4th 41, 55; Draft EIR page 2.3-25).

Furthermore, the proposed plan is a high-level planning document, not a financing or programing document, it does not program or allocate funding to specific projects, nor does it overwrite local agencies' land use authority. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding financial and revenue estimates. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" for more on the role of MTC in relation to local governments.

Comment I29-17

Among many issues, the Plan ignores funding needs in health care, education, power, and stormwater. The Plan does not propose any energy supply projects / infrastructure, or address the funding requirements and sources of funds for energy supply or efficiency projects, or assess the affordability implications for residents of impending trends such as AI datacenters.

Response I29-17

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area 2050+ is a long-range regional plan implemented over time through actions by multiple agencies, and implementation depends on future funding availability and decisions outside MTC and ABAG authority. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" and "Master Response7: Regional Coordination, Partnerships, and Local Implementation" regarding plan funding and local implementation, respectively.

Comment I29-18

The Plan acknowledges that more population and housing growth will put upward pressure on schools (infrastructure needs and service demand), but it does not itself calculate or allocate specific funding for new schools, school operating budgets, or school debt service in the regional plan documents. The regional plan and DEIR assign mitigation responsibility to the local governmental entities that operate and fund those services (e.g., school districts, cities/counties). School infrastructure and operating costs

resulting from growth are not paid for by the Plan as a regionwide revenue program. Instead, local school districts, local governments, developers (via fees), and state/federal education funding mechanisms are the entities expected to address growth-related school needs. Yet we have substantial history in California indicating that school funding is already inadequate. The Plan must address this shortcoming, both as a matter of social equity, and to secure the economic vitality of the region.

Response I29-18

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding roles and authority of MTC and ABAG and local jurisdictions and "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding the priorities of the plan.

Comment I29-19

Health care is also not properly considered in the Plan. This omission is consistent with the Plan's prior, traditional role as a regional transportation plan (RTP) and sustainable communities' strategy (SCS) — which is not intended to function as a comprehensive social services or health system planning document but instead to shape growth patterns, infrastructure investment frameworks, and environmental outcomes. And that is a fatal flaw in the Plan.

Response I29-19

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding the priorities of the plan.

Comment I29-20

Any truly 'sustainable' community plan must include consideration of supply and affordability of services such as health care, education, water, first responders, and energy. By proposing a lot of 'transit and housing' initiatives and omitting vital related services, and by omitting consideration of the severe fiscal stress on governments and public agencies throughout the region, the Plan appears as a self-serving "me first" document for the Transit and Real Estate industries which would leave solving all the real problems in the laps of an overburdened, underfunded county, city, and public works governance.

Response I29-20

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. If adopted, the proposed plan would be advisory and not binding at the local level. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding the roles and authority of MTC and ABAG and local jurisdictions and to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding the priorities of the plan. The proposed plan meets all requirements of an RTP/SCS as provided by the State. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-21

The stressed condition of our local governments and agencies clearly indicates that they are at present unable to manage growth sustainably, especially from a fiscal perspective. The concept of a 'structural deficit' sounds like a valid excuse, when it is merely the cumulative impact of many bad financial decisions over time. There is an unfilled and important role required, by the MTC or some other authority, to provide policies which enable local governance to manage affairs in a fiscally sustainable manner.

Response I29-21

Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding the priorities of the plan. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-22

7) Question: Will the MTC expand its planning and analysis to include the fiscal sustainability and viability of essential services such as health care, education, water, wastewater, stormwater management, wildfire mitigation, first responders, evacuation capacity, and energy?

Response I29-22

Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision. Environmental impacts related to schools, water, wastewater, stormwater management, wildfire, first responders, evacuation capacity, and energy are analyzed in Chapter 3 of the Draft EIR.

Comment I29-23

8) Question: Will the MTC expand its Plan recommendations to include improved policies for local governance growth management to ensure both environmental and fiscal sustainability?

Response I29-23

Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision, and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding the roles and authority of MTC/ABAG and local jurisdictions. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-24

2. Omission of Transit Strategy Alternatives

The Plan analysis acknowledged that autonomous vehicles are a major source of uncertainty in future transportation, noting potential implications – but not analyzing alternative transit strategies - such as:

1. AV's increasing commute feasibility, but also reducing the attractiveness of transit or biking,
2. EV AV's further reducing GHG's below traditional transit levels.
3. Cost savings from distributed transit alternatives

Strategy EN9 is the only mention of vanpool alternatives, which are an unstated fraction of the $2 Billion in that strategy. This represents less than 0.4% of the projected Transit costs, and is likely the most cost-effective and convenient alternative with the potential to save large amounts of transit infrastructure, operating costs, and GHG emissions. We find no cost per mile or convenience comparison with the more expensive and less convenient traditional transit alternatives.

No distinct autonomous vehicle or ride-hail strategy is explicitly included among the 35 the Plan strategies for funding or implementation. Ride-hail and taxi trips are captured in modeling and forecasts (e.g., commute mode share), but there are no plan-directed policies specifying how autonomous vehicles will improve service or reduce transit costs. The Plan's core transportation emphasis remains on traditional

transit improvements, integration, and system optimization rather than substituting emerging, agile and affordable mobility technologies. In addition, the Plan lacks any projection of the ongoing capital and operational costs of these affordable, emerging alternatives compared to the Traditional Transit now extant.

The Plan needs to consider Alternative Future Visions, especially for Transit. One alternative that one would expect would be to expand automobility options – widen freeways, improve arterial, collector, and residential street capacity, develop new lands OUTSIDE of the growth limits, etc. Encourage remote work and shopping. For transit, focus on the cheap, easy, and low risk, including long-haul commuter express bus service, particularly on Bay Area Expressways, and expand the Expressway network. Expand vanpool services in neighborhoods for convenient short haul trips, including to and from transit stops.

9) Question: Will the MTC expand its analysis to evaluate the comparative cost/benefit of alternatives to traditional transit instead of only 'more of the same'?

Response I29-24

Please refer to "Master Response 3: Plan Alternatives" regarding CEQA requirements for alternatives analysis. As described in State CEQA Guidelines Section 15126.6, an EIR is required to evaluate a reasonable range of alternatives that could feasibly attain most of the project's objectives while reducing significant environmental impacts. An EIR is not required to analyze all possible transportation strategies or conduct comparative cost-benefit analyses of alternatives. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding new strategies and transportation projects. The comment does not identify deficiencies in the adequacy, accuracy, or completeness of the Draft EIR's environmental analysis under CEQA. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-25

3. Omission of, and Bias in, Transit Decision Criteria

More broadly, the Plan establishes no cost or performance benchmarks for the performance of transportation alternatives, no binding financial performance metrics (e.g. cost per passenger mile, full trip cost from origin to destination, etc.) and no comprehensive service metrics (e.g. travel time from origin to destination) by which proposed programs and competitive alternatives could be assessed for viability and monitored on an ongoing basis.

The benefit criteria used in Appendix 2 of the DRAFT Transit 2050+: A New Vision for the Bay Area's Transit Network document are unauditable, undocumented, and likely illusory, such as: Accessibility, Transit Crowding, Freeway Reliability, Vehicle Ownership, Environmental, Health and Safety. Rather than allow a competitive market for transportation to indicate what residents prefer, this framework tells people what's good for them. The transit ridership statistics in the Bay Area make it very clear that, even with 80% of transit costs being paid by someone other than the riders, people have already decided what is best for them.

For the 54 transit projects there are Benefit-Cost Ratios without full supporting data or explanation. One basic financial analysis element should be to detail annual costs and revenues from project operation through the first lifecycle of the involved assets, with those costs including capital costs, operations and maintenance, and eventual asset replenishment costs. All that are disclosed in Attachment D are lump summary costs with no explanation of revenues, assumptions, or annual timing. The financial payoff is not disclosed.

The benefit criteria used in *Appendix 2 of the DRAFT Transit 2050+: A New Vision for the Bay Area's Transit Network* lack supporting detail and there is no known method of auditing the results. Those benefits are: Accessibility, Transit Crowding, Freeway Reliability, Vehicle Ownership, Environmental, Health and Safety. Rather than allow a competitive market for transportation to indicate what residents prefer, this

framework tells people what's good for them. The transit ridership statistics in the Bay Area make it very clear that, even with 80% of transit costs being paid by someone other than the riders, people have already decided what is best for them. This "cost-benefit" process amounts to justifying hard costs with imaginary benefits, while hiding the financial losses from examination.

10) Question: Will the MTC employ auditable financial measures and project financial payoff for the proposed projects, in addition to the 'soft benefits' currently utilized to justify them?

Response I29-25

The Plan Bay Area 2050+ Performance Report includes further detail on the Project Performance Assessment methodology and inputs used in the assessment, and the technical memo detailing the Plan Bay Area 2050+ Transportation Project Performance Assessment methodology is available at https://planbayarea.org/digital-library/memo-final-ppa-methodology-pba50pdf.

Please refer to Responses I29-16 for a discussion regarding economic effects and CEQA. Please refer to "Master Response 3: Plan Alternatives" regarding CEQA requirements for alternatives analysis. Furthermore, as described in "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," the proposed plan does not itself program or allocate funding to specific transportation projects or local infrastructure obligations, and implementation would occur over time through subsequent actions and funding decisions by multiple agencies. The comment does not identify deficiencies in the adequacy, accuracy, or completeness of the Draft EIR's environmental analysis under CEQA. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-26

4. Analytical and Policy Bias

Plan modeling is based on attaining a jobs goal and driving spending based on that, rather than modeling interactive growth of population and jobs. Inflated jobs forecasts inflate population forecasts and lead to overstated transit demand, which lead to overstated funding requests.

Forecasts are not neutral: They are designed to support a narrative of growth and investment, which makes them political tools for intrenched transit and real estate interests.

Inflated job forecasts automatically inflate population projections, then housing needs, and then infrastructure costs. "Jobs as the Anchor Variable", or initial assumption, is a fatal logic flaw.

Response I29-26

Please refer to Response I29-16 for a discussion regarding economic and social effects. Please refer to "Master Response 1: Regional Growth Forecast" for additional discussion regarding the assumptions and methodology of the plan's regional growth forecast. The comment does not identify deficiencies in the adequacy, accuracy, or completeness of the Draft EIR's environmental analysis. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-27

What is stated as a desirable goal is actually an indication of narrow thinking in the Plan:

"To promote job growth and economic opportunity, Plan Bay Area 2050+ envisions revitalized clusters of job training and employment opportunities, with employers incentivized to locate in-person jobs near these regional economic hubs and boost downtown activity by 2050."

The goal should not just be jobs, but more INCOME for job holders, and/or less personal expenses. The goal should not be to boost decaying downtowns and exacerbate congestion by requiring commutes to work and shop, but to attract jobs where people want and can afford to live, and to allow them to NOT commute very far for work, shopping, or services – for example by utilizing telecommunications. The expense of inner-city living is part of our affordability problem and the housing that is being constructed under current State housing policy is largely $1M per unit market rate rental apartments, and unaffordable by many - and that is because investors need a return on the large construction costs of dense urban apartments. Distributing housing to cheaper land can reduce costs.

Response I29-27

The commenter's recommendations are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area strategies may be refined over time based on changing conditions and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I29-28

Further, it is simplistic to think that spatial location is a prime driver of economic development. While transportation, affordable housing, and workforce quality are certainly contributors to attracting companies and workers, more relevant to job creation and retention are: universities, raw materials, shipping, energy, access to capital, cost of living, and taxation – all compared to competing regions. A broader and deeper analysis of economic development must underpin any regional jobs forecast and plan.

Response I29-28

Please refer to Response I29-26. The comment does not identify deficiencies in the adequacy, accuracy, or completeness of the Draft EIR's environmental analysis. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-29

To be consistent and comprehensive, a true Plan Bay Area should either omit all funding for Transit and Housing, as it omits such funding for all the essential local services listed previously, OR the Plan must also consider concomitant funding programs for all essential services and infrastructures in proportion to their priority for residents. Note finally that water, wastewater treatment, power, and flood control – among others - are aspects of infrastructure which have fewer ready substitutes than transit, and should take priority in funding.

11) Questions: Will the MTC project the funding required for all actions required to support its Plan, including those required by local governments and agencies, rather than just projecting funding for the currently envisioned strategies? If not, how can it consider this DEIR complete and the Plan a valid document?

Response I29-29

Please refer to Response I29-17 and Response I29-20.

Comment I29-30

5. Inadequate Water Supply Considerations

Water supply problems, which are obviously a concern at our current levels of population (witness the State Water Board November hearings on the Bay Delta Plan water fights), are casually dismissed and not considered for funding by the Plan, even as DEIR Section 3-14 repeatedly mentions the need for supplemental supplies under conditions of 'gradual population rebound':

"It is possible that demand in the SCWA could exceed the county's supply, which would require the county to acquire additional sources from other counties in the region or elsewhere."

Response I29-30

The Draft EIR discloses and discusses the region's existing water supply issues in Section 3.14, "Public Utilities and Facilities." The Draft EIR relies on urban water management plans prepared by regional agencies that supply water to the plan area. The proposed plan would not resolve the region's preexisting water supply issues. The proposed plan, however, has the potential to help decrease per capita water demand within the region if the plan is implemented. Specifically, development under the proposed plan would focus future growth within already developed areas. This development pattern has three distinct benefits. First, implementation of the plan's development pattern would help protect the region's water quality by limiting growth in local watersheds that drain into supply sources. Second, by focusing development, per capita water use is likely to be less because of a greater share of multifamily housing and modern water efficiency standards for new construction and development, such as reduced areas of intensive water needs, such as lawns. Additionally, by showing the effects of concentrating future growth in already developed areas, the proposed plan demonstrates the benefits of existing water supply infrastructure and demonstrates how to reduce the need for new water infrastructure to be developed to service new areas.

Impact PUF-2 identifies potentially significant impacts to water supply from the proposed plan. Implementation of Mitigation Measures PUF-2(a), PUF-2(b), and PUF-2(c) would reduce impacts associated with water supply because they would require that land use, sea level rise adaptation, and transportation project sponsors coordinate with water suppliers to ensure adequate water supplies exist or comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use. Projects taking advantage of the CEQA streamlining provisions of SB 375 (Public Resources Code PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions.

Please refer to "Master Response 2: Mitigation Measures" regarding funding mechanisms related to the proposed plan.

Comment I29-31

The plan admits there is risk and uncertainty about water supplies:

The uncertainty of water supply availability is furthered by the plan's 2050 horizon being 5 to 15 years further than water agencies' 2015 and 2020 UWMPs, which have a planning horizon of 2035 or 2045. The increase in population-, household-, and jobs-related demand on water supply coupled with potentially reoccurring drought conditions may result in insufficient water supply to serve the plan area.5

Yet the plan provides neither analysis, recommendations nor funding for where and how the additional water is to come. The Plan presents a 24% population growth, but no analysis of the water supply and water cost burdens. The Plan does not commit to funding or building major water-supply infrastructure (e.g. new reservoirs, desalination, large recycled-water systems (Note that BAWSCA had $23 Billion in water resilience project estimates 2 years ago). Instead, it leaves those actions to local water agencies and jurisdictions, while using demand management as the primary lever.

Response I29-31

Please refer to Response I29-30 regarding water supply analysis in the Draft EIR. As described in the Draft EIR, the proposed plan is a regional planning document, and the EIR provides a program level assessment of potential impacts related to water supply. The Draft EIR acknowledges that the plan could result in population or job growth beyond what is assumed in current UWMPs, which could contribute to

insufficient water supplies in certain areas. For this reason, Impact PUF2 (Water Supply) concludes that the impact would be significant and unavoidable.-level assessment of potential impacts related to water supply. -2 (Water Supply) concludes that the impact would be significant and unavoidable.

Please refer to Responses I29-16 for a discussion regarding economic effects as they relate to CEQA. Please refer to "Master Response 2: Mitigation Measures" regarding funding mechanisms related to the proposed plan.

Comment I29-32

In fact, water demand section of the DEIR appears to contradict the Plan's 24% projected surge in population growth:

"*Although the Bay Area's population grew steadily for several decades, recent estimates indicate a slight downward population trend since 2020, largely driven by out-migration and other factors (DOF 2023). Despite this recent decline, many water agencies project that long-term population in the region will either stabilize or gradually rebound and thus continue to influence water demand in the coming years (MMWD 2021; SFPUC 2021; EBMUD 2021).*" [6] [underline added].

[6] PBA DEIR, Section 3.14-11

Response I29-32

As described in Section 3.14.1 of the Draft EIR, the cited passage summarizes short-term demographic trends observed since 2020 and water agency projections providing background information. The 24 percent population increase as a result of the proposed plan reflects the long-range regional growth forecast prepared for the plan's 2050 horizon and was used for the water supply impact analysis (Impact PUF-2) in the Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment I29-33

The consideration of drought risk dramatically understates the potential impact of Climate Change on water availability. The Plan cites only 20th and 21st Century droughts and characterizes them as "the driest five years on record for the state". This characterization ignores the obvious acceleration of temperature increases, early snow melts, and changes in precipitation patterns that have all increased markedly since the 2016 and prior years data cited. This summary also ignores the fact that the longest droughts in the West were 140 and 200 years in the Middle Ages.[7] Those droughts were due to natural climate variability BEFORE human-caused climate change, which will make things worse for the thousands of years that excess CO2 persists in our atmosphere and oceans. As pointed out by the author of that paper:

"*Dr. Stine, who reported his findings last month in the British journal Nature, says that California, like Tiwanaku, presents* ***"a classic case of people building themselves beyond the carrying capacity of the land****," which is determined not by wet times but by dry ones. "What we've done in California is fail to recognize that there are lean times ahead," said Dr. Stine, "and they are a lot leaner than anything we've come up against" in the modern era."*

[7] **California Droughts in human history.** https://www.nytimes.com/1994/07/19/science/severe-ancient-droughts-a-warning-to-california.html Beginning about 1,100 years ago, what is now California baked in two droughts, the first lasting 220 years and the second 140 years. Each was much more intense than the mere six-year dry spells that afflict modern California from time to time, new studies of past climates show. The findings suggest, in fact, that relatively wet periods like the 20th century have been the exception rather than the rule in California for at least the last 3,500 years, and that mega-droughts are likely to recur.

Side Note: in the Paleo climate records, California droughts exceeded 1,000 years. Again, this happened with only NATURAL climate variability.

Response I29-33

As discussed in the "Drought" subsection in Section 3.14-1, "Environmental Setting," of the Draft EIR California, including the plan area, may face future water supply challenges associated with climate change-related periods of drought. The uncertainty of water supply availability is furthered by the plan's 2050 horizon being 5 to 15 years further than water agencies' 2015 and 2020 UWMPs, which have a planning horizon of 2035 or 2045.

Please refer to Response I29-30 regarding water supply impacts in the Draft EIR. Because the Draft EIR's significance determination is based on the plan's long-term 2050 growth forecast and the recognized uncertainty of future water availability under climate change, incorporating a longer historical drought record (including paleoclimate droughts) would not change the significant and unavoidable conclusion in the Draft EIR. The EIR acknowledges that climate change is expected to increase drought severity, and the significant and unavoidable findings reflect this uncertainty at a program level.

Comment I29-34

The Plan recognizes drought risk[8], but does not propose to act on, or fund mitigation for it, as it does for Sea Level Rise. The Plan expects existing residents as well as new projects to increase conservation allowing population growth at their expense, and does not assess affordability or quality of life impacts on residents. Yet the Plan goes to great length to assess affordability and quality of life issues for transit users, which are a far smaller proportion of the affected region. This analytic inconsistency must be remedied.

[8] DEIR 3.14-13

Response I29-34

Please refer to Response I29-30 regarding water supply impacts and mitigation measures in the Draft EIR. As described under Impact PUF-2, the Draft EIR provides a detailed, region-specific evaluation of insufficient water supplies during normal, dry, and multiple-dry years (drought), drawing on Urban Water Management Plans (UWMPs), Water Supply Assessments, and other long-range planning documents prepared by the region's water agencies.

With respect to equity considerations, CEQA does not require a socioeconomic analysis of affordability or quality-of-life impacts unless such effects are tied to a physical environmental change (State CEQA Guidelines Section 15131). The Draft EIR's analysis of transit affordability relates to potential physical environmental effects associated with transportation investments and mode shifts. Water-supply conservation requirements, by contrast, are regulatory and operational decisions made by water agencies and do not constitute a physical environmental impact under CEQA. As such, the Draft EIR does not evaluate the socioeconomic implications of conservation measures on residents.

Comment I29-35

The Plan's failure to recognize both California climate history and the probable future Climate Change impacts to water supply is another dangerous flaw. A more appropriate planning approach would have been to consider significant funding for water supply resiliency for the existing population (as opposed to say, UBI), and recommend policies to make growth pay for itself and bring its own water, instead of placing the costs and risks on existing residents. Further, significant analysis is required to assess whether the cited Newsom legislative actions[9] are sufficient to secure affordable water for current residents, and at what impact to resident affordability thereof, and what further actions need be taken to secure sustainability of our regional civilization. The Plan ignores these critical matters. As drought risk is far more immediate than sea level rise, this oversight is inexcusable.

12) Question: Will the Plan be upgraded to reflect and fund mitigation of the water supplies required to support the projected population?

[9] DEIR section 3.14-12

Response I29-35

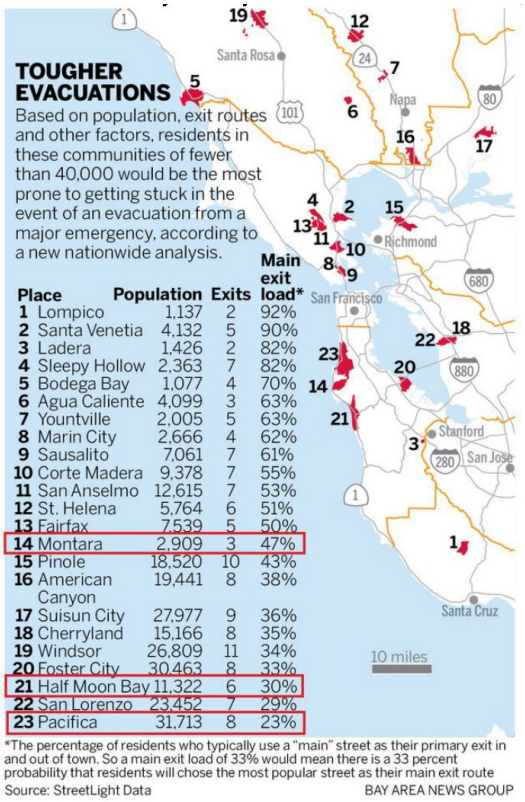
Please refer to Responses I29-30 through I29-34 regarding water supply impacts and mitigation, climate change and drought, and economic effects as they relate to CEQA.

Comment I29-36

6. Misguided Housing Considerations

Plan Bay Area is building housing when we don't need housing. Of course, State housing policy is forcing unjustified RHNA numbers on cities and counties, but that doesn't mean serious planners have to ignore the flaws in State housing policy. The Plan should objectively assess whether housing units are required, and of what type, rather than accept top-down dictates that are already unreasonably stressing local governments.

Planning assumes all areas must urbanize, without considering realities on the ground local governments are struggling with. Forcing density into hazardous areas without adequate evacuation egress – such as my unincorporated area of San Mateo County [*Map, left*] – will couple catastrophic events with horrific human casualties.



Place	Population	Exits	Main exit load*
1 Lompico	1,137	2	92%
2 Santa Venetia	4,132	5	90%
3 Ladera	1,426	2	82%
4 Sleepy Hollow	2,363	7	82%
5 Bodega Bay	1,077	4	70%
6 Agua Caliente	4,099	3	63%
7 Yountville	2,005	5	63%
8 Marin City	2,666	4	62%
9 Sausalito	7,061	7	61%
10 Corte Madera	9,378	7	55%
11 San Anselmo	12,615	7	53%
12 St. Helena	5,764	6	51%
13 Fairfax	7,539	5	50%
14 Montara	2,909	3	47%
15 Pinole	18,520	10	43%
16 American Canyon	19,441	8	38%
17 Suisun City	27,977	9	36%
18 Cherryland	15,166	8	35%
19 Windsor	26,809	11	34%
20 Foster City	30,463	8	33%
21 Half Moon Bay	11,322	6	30%
22 San Lorenzo	23,452	7	29%
23 Pacifica	31,713	8	23%

Density, so far under new laws, provides about 85% market rate housing. Lower income populations are further priced out, with no ownership possibilities. The real issues are Affordability and Wealth inequality, and current housing policy subsidies enrich the already-wealthy investors while denying equity in their residences to residents – sentencing them to rent slavery (and to continuing complaints about rent control). Better policy is to give equity in their housing to the residents, to reduce wealth inequality and stop subsidizing wealthy investors.[10]

[10] Attachment 1 repeats testimony on this issue given at the MTC in 2024.

Response I29-36

The commenter's policy perspectives are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The proposed plan emphasizes affordable housing options for all Bay Area residents, particularly for residents with the lowest incomes and highest needs. The housing strategies focus on producing more housing at all affordability levels, preserving the region's existing affordable housing and protecting renters from the effects of the Bay Area's high housing costs.

Comment I29-37

Per an interview with Jay Forrester of MIT, who wrote the book on Urban Dynamics with major city mayors, low-cost housing poses serious risks for economic viability: "*Because low-cost housing uses up land that could have been used for job-creating opportunities while it pulls in people that need jobs*.", thus any housing strategy must be paired with job access and ownership opportunities.[11] Since the State will not do this, it is imperative that our regional governance create and advocate for housing strategy that makes economic sense.

[11] "we found that the most powerful leverage point in the urban system with respect to stagnation and poverty in the city - the most powerful leverage point was the building of low-cost housing. And, in fact, you should take it out, not put it in. Because low-cost housing uses up land that could have been used for job-creating opportunities while it pulls in people that need jobs. It's a double-edged sword for creating poverty, because it concentrates people who need jobs in locations where there are not jobs. And then as the poverty gets worse, there's more pressure to provide housing. So it's a cycle that can carry the city into a very depressed state" https://www.informs.org/content/download/368207/3846897/file/JayWForresterOralHistory.pdf

Response I29-37

The commenter's policy perspectives are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area includes economic mobility and equity strategies and is implemented over time through actions by multiple agencies. Please refer to" Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding implementing tools to implement strategies.

Comment I29-38

13) Question: Will the Plan be updated to evaluate the reasonableness of State RHNA requirements, and to define improved State housing guidelines?

Response I29-38

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please also refer to "Master Response 1: Regional Growth Forecast" for more on the relationship between the proposed plan and the RHNA process.

Comment I29-39

14) Question: Will the Plan expand its considerations of increased home ownership to include defining policy and funding alternatives for housing which allow residents to own equity in their dwellings, including apartments - thus reversing trends in wealth inequality in the Region?

Response I29-39

The commenter's recommendation is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area strategies and implementation priorities may be refined over time. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I29-40

7. Failure to Capitalize on Telecommunications Opportunities

The Plan recognizes some of the needs and benefits of improved Telecommunications in the Region. However, it fails to allocate funding for telecommunications infrastructure projects or broadband affordability programs, or to analyze the economic cost/benefit of such improvements. Improved internet speed and availability are widely recognized as:

1. A matter of social equity for access to opportunity
2. Critical to work and shop from home job opportunities
3. Important in reducing greenhouse gases by reducing job commuting and shopping trips
4. Important in access to health care services
5. Important in modern education
6. A stimulus to job creation & employment in the region

Improved telecommunication is clearly one method to reduce the time and cost burdens of traditional transit, yet the Plan does not propose a strategy for broadband expansion, equity in digital access, or network modernization, nor does it propose regional investment programs or direct funding for broadband deployment as a core plan strategy. One major alternative path of analysis needed is to compare scenarios where improved telecommunications are deployed, and the increase in employment opportunities and quality of life, and the resulting cost decreases in education, healthcare, transportation & pollution are evaluated against the currently subsidized traditional transit scenarios.

Thank you for addressing my concerns.

Response I29-40

The commenter's recommendations are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Strategy packages and priorities may be refined as conditions evolve. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I29-41

15) Question: Will the Plan develop and evaluate alternative scenarios which use policies and investments to capitalize on the efficiencies of modern telecommunications?

Response I29-41

Please refer to Response I29-40.

Comment I29-42

8. Omission of Improved Transportation Network Design Alternatives

The Plan ignores the major problem causing high transit costs: the network design. Traditional transit is designed on the premise that high capacity is needed for peak periods where the system must move "*Everyone from Everywhere All At Once*" to the same urban cores. That design has caused the enormous costs present today, and that fixed infrastructure lacks the flexibility to de-scale and relocate to meet the new demands of a more distributed work & shop from home reality. The Plan proposes only modest, incremental changes to the traditional transit network. In a Plan costing $1.5 Trillion and taking 25 years

to effectuate, fundamental redesign of the transit network and employment landscape is certainly a relevant alternative to evaluate.

Response I29-42

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The comment seems to imply that the design of the transit network creates high transit costs. Please refer to Response I29-16 for a discussion regarding economic and social effects as they relate to CEQA. Please also refer to "Master Response 3: Plan Alternatives" and "Master Response: 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities," regarding alternatives analyzed in the Draft EIR and plan strategies, respectively. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-43

Redesign of employment centers to a decentralized mode, such as the ring of high-tech employment around Boston on Route 128, will obviate the need for expensive fixed-rail systems and allow people faster, shorter commutes to places of work, wherever physical attendance is required. Such a regional diversification will also avoid paying high costs for office space in crowded cities, attracting more start-ups at cheaper locations (assuming telecommunications are provided – see above). Hopefully those start-ups will mature and attract even more decentralized employment. The flexible transit infrastructure needed should be less expensive, as more people can drive or bike to work without central artery congestion. And a properly designed agile transportation infrastructure to efficiently support that decentralized network can adjust – up or down – in or out – to an evolving job and residence landscape going forward. The Plan needs to provide analysis of such a decentralized structure and show what transit infrastructure can be retired, and created, to serve a more efficient network design, and to scope the capital and operating costs and revenues which are required.

Response I29-43

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-16 for a discussion regarding economic and social effects as they relate to CEQA. Plan Bay Area strategies may be refined over time based on changing conditions and agency decisions. Refer to Master Response 3: Plan Alternatives" regarding alternatives analyzed in the Draft EIR and "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan strategies and implementation priorities.

Comment I29-44

One major premise of the Plan is a fossilized Traditional Transit network:

"Fully funding the Bay Area's existing transportation system remains a top priority under MTC's longstanding 'Fix It First' Policy. First and foremost, the plan identifies funding to operate and maintain our existing network of transit routes, roads and bridges."[12]

That approach blinds planners and the public from a critical examination of the cost and performance of the current transportation system, which is sorely needed before agreeing to perpetuate them at a cost of half a trillion dollars. Instead, unbiased planning would begin by assessing the cost performance and reinvestment burden of existing systems compared to alternatives, including competitive substitutes and system retirement or curtailment.

[12] Draft Plan Bay Area 2050+ (Full Document); Transportation Element section under the "Maintain and Optimize the Existing System" theme; page 72.

Response I29-44

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area implementation is adaptive and can be refined based on performance, fiscal conditions, and agency decisions over time. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding implementation priorities and plan funding.

Comment I29-45

16) Question: Will the MTC evaluate an alternative which distributes jobs and residents AWAY from crowded urban cores to smaller cities, and which mitigates transportation burdens by lowering peak transportation loads on a centralized transportation network?

Response I29-45

The commenter's recommendation is noted. Alternatives, such as the one recommended by the commenter, have been evaluated in previous EIR's for Plan Bay Area. An alternative in the Plan Bay Area 2040 EIR, Main Streets, provided a plan that targets future growth to foster moderately sized integrated town centers. The Main Streets Alternative had a higher VMT, increased delay, and more non-freeway routes as compared to Plan Bay Area 2040. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area may be refined over time as conditions evolve. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I29-46

D. Underestimated Risks and Excessive Costs

1. Underestimated and Inconsistent Transit Project Costs

The Plan, in the paper Draft Transit 2050+ Report [*Attachment D: "Detailed Table of Lifecycle Costs"]* presents project costs and lifecycle costs in billions of 2019 dollars., while other papers [*e.g. DRAFT TRANSPORTATION PROJECT LIST REPORT page 16, et al*] use YOE (Year of Expense) costs.

DEIR Section 2 Project Description cites $500B for transit project costs, but expresses it in 2019 dollars, which are 55% higher in 2025 given the Calif. Construction Cost Index.

Thus, the Plan transit costs should be $275 Billion higher in 2025 dollars, for a total of $775 Billion. Expressed in YOE dollars, those totals should be even higher.

17) Question: Will the Plan conform its cost estimates to YOE numbers and avoid understating Plan costs?

Response I29-46

The comment is correct that the lifecycle costs in Attachment D of Appendix 2 in the Draft Transit 2050+ are presented in billions of 2019 dollars discounted present value and the project costs in the Draft Transportation Project List Report are presented in year-of-expenditure (YOE) dollars. The proposed plan's $500 billion transportation element funds (identified in Chapter 2, "Project Description," of the Draft EIR) are based on the project costs identified in the Draft Transportation Project List Report. Therefore, the $500 billion are in YOE dollars. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-47

2. Lack of Consideration of the Comparative Costs of Transit Alternatives

Major Bay Area Transit systems operations cost over 6x per passenger mile compared to an EV[13]. Bay Area Transit systems tie up 16 time more funds per passenger mile than an EV[14]; they are extremely asset-inefficient outside of dense metropolises such as NYC and Tokyo. Nationally, even using depreciation expense at original asset values (which are far less than current replacement costs) rail systems cost $3.18 per passenger mile; Bus, vans, paratransit cost $0.75ppm, and private auto is under $0.38 ppm[15]. An AV ride-share or vanpool would be even cheaper than an EV because the vehicle usage and the number of riders per trip would increase.

[13] Spreadsheet analysis of 2024 ACFR's for 8 major Bay Area Transit Operations, in Attachment 2. https://shiftbayarea.substack.com/p/the-true-cost-of-transit

[14] Ibid

[15] AI summary to be cited

Response I29-47

Please refer to Responses I29-16 for a discussion regarding economic and social effects as they relate to CEQA. The EIR includes a reasonable range of alternatives based on their ability to meet project objectives and reduce significant and unavoidable impacts. Please refer to "Master Response 3: Plan Alternatives" for a discussion of alternatives. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-48

The Plan claims ambitious improvements if its transit spending is implemented, for example:

By 2050, the combined housing and transportation cost burden for all Bay Area households could decrease by 25%, while for low-income households, this cost-burden reduction could reach 50%. The share of households near frequent transit across the Bay Area could increase by 45% under plan strategies, and the number of jobs accessible via transit, biking or walking is projected to increase by 40%.

There are two questions that this analysis does NOT address: First, at what cost will these services be provided, and compared to what other transportation alternatives? And second, is that level of service good enough for the money? Access to transit still requires you to GET TO and FROM transit, at times carrying your groceries home in the rain. A ride-shared EV AV or van could attain costs per passenger mile of $0.30 to $0.50[16], compared to the major Bay Area transit agencies' $3.40 per mile, while providing door to door convenience and time savings. The savings in travel time and improvement in convenience of vanpool on request services could be a major improvement over the expensive, traditional alternatives the plan proposes to fund, yet is not analyzed.

[16] The California Vanpool Authority costs $0.13 per passenger mile per this report: https://californiapolicycenter.org/reports/the-cost-of-transit-in-california/

Response I29-48

Please refer to Response I29-47. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-49

18) Question: Will the MTC revise the Plan to include service metrics for the full origin to destination time and cost of transportation, so that the increased convenience of vanpool, ride-hail, and AV alternatives are properly compared to traditional transit services?

Response I29-49

The commenter's recommendation is noted. Plan evaluation methods may be refined in future updates. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I29-50

3. Consider Avoidance of Capital Cost Risks

Traditional transit alternatives involve large up-front capital costs in inflexible infrastructure in the hopes that high utilization will reduce per passenger mile costs and pollution. History has shown that these hopes have not been realized and that these costs are much higher than passenger vehicles. Continued investment in large infrastructure should be stopped and investments instead made in smaller buses and vans which can be demand-adjusted in routes and locations based on customer needs. Such has been the approach in Seoul, South Korea, where express bus lanes replace fixed rails systems.[17] Further, more agile road-based transit can be scaled up or down, unlike fixed rail systems.

[17] https://www.seamlessbayarea.org/blog/2025/5/5/notes-from-korea-how-bus-reforms-and-fare-integration-transformed-seouls-transit-bs2yk

Response I29-50

The commenter's recommendation is noted. Plan Bay Area strategies and implementation priorities may be refined over time, please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities."

Comment I29-51

4. Massive Costs Per Bay Area Resident

The plan identifies almost $1.5 trillion in "investments" but only about $600 billion in existing revenues, leaving a massive gap which would require huge new taxes. Just the UNFUNDED portion of this plan would require $100k per person in the Bay Area over the next 25 years ($4k/yr/person) and with more accurate population and cost figures (*see point 1 above about the error in transit costs*), that number is an UNDER-estimate of the per resident cost burden.[18]

[18] Attachment 3 shows the calculation of this cost using MTC's assumptions.

Response I29-51

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area recognizes uncertainty in future funding and does not assume guaranteed revenues for all long-term strategy concepts. Please refer to Response I29-17.

Comment I29-52

5. Out of Context Giveaway

The Plan proposes giving away $200B in Universal Basic Income (UBI) rather than funding the many local government infrastructure investment needs required. The tradeoff between social justice and economic contribution is too large a topic for this comment letter, but until the Plan has fully quantified the level of

infrastructure and operating deficits in the region's local governments and agencies, consideration of this expense is at best premature.

Response I29-52

Please refer to Response I29-51. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-53

19) Question: Will the MTC upgrade the Plan to define project investment contingency gateways based on full lifecycle funding availability, so that – as happened with Calif. High Speed Rail – the Plan does not foster waste by creation of uneconomic, stranded assets?

Response I29-53

Please refer to Response I29-51.

Comment I29-54

6. Prioritizes the Wrong Climate Risk

Sea Level rise is given much emphasis in strategy EN-1. The Plan proposes spending $96 Billion on sea level rise adaptation, but stormwater is unfunded and treated as a regional compliance issue. In fact, storm-related flooding is already a clear and present danger, and the science and policy to cope with it are both inadequate.

Response I29-54

The Draft EIR evaluates hazards and identifies program-level mitigation measures and performance standards applicable to future projects and implementation actions. As discussed in Section 3.10, "Hydrology and Water Quality," of the Draft EIR, impacts related to flooding were determined to be less than significant when complying with existing regulations to provide low impact development drainage design, improve stormwater retentions, and maintain pre-project hydrology. In addition, development near the coast would be subject to the California Coastal Commission's Coastal Development Permit, which would require protection of coastal watersheds. The California Coastal Act also provides the California Coastal Commission with authority to control development that contributes to flooding and surface alterations in and around the development site. Therefore, no mitigation is required. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding the implementation priorities.

Comment I29-55

Green stormwater infrastructure does not address the reality of current climate risks, the science is flawed, and there is no commitment to a full-fledged regional flood-control program for inland flooding, which is an immediate need. We fully agree the DEIR statement in Mitigation Measure PUF-1(b) page 3.14-40 which states "*Model and implement a stormwater management plan or site design that prevents the post development peak discharge rate and quantity from exceeding pre-development rates*." However, we suspect that the MTC and most cities, counties and agencies do not realize that even the newest NOAA atlas of rainfall data is over 10 years out of date (2014) and that the National Academies of Science has admitted that current methods for estimating peak precipitation do not work – and it needs 10 to 15 years to fully research and solve this problem.[19]

[19] most concerning recent scientific finding is contained in the National Academies of Science 2024 document: Modernizing Probable Maximum Precipitation Estimation.

Response I29-55

The commenter raises concerns regarding flooding and stormwater infrastructure and expresses support for Mitigation Measure PUF-1(b). However, the commenter does not provide specific detail regarding the adequacy, accuracy, or completeness of the Draft EIR. Flooding issues related to drainage pattern changes are addressed in Impact HYDRO-4 of the Draft EIR (pages 3.10-38 through 3.10-41). Impact HYDRO-4 concludes that implementation of the proposed plan could result in new development and redevelopment that would have the potential to result in project-specific changes to existing drainage patterns. In compliance with adopted regulations, individual projects are expected to adopt best management practices appropriate to local conditions to reduce flooding related impacts to a less-than-significant level. Stormwater infrastructure impacts associated with implementation of the proposed plan are addressed in Impact PUF-1 of the Draft EIR (pages 3.14-35 through 3.14-42). Impact PUF-1 concludes that operation of the proposed plan would result in potentially significant impacts related to stormwater drainage. Implementation of Mitigation Measures PUF-1(b), PUF-1(c), and PUF-1(d) would reduce impacts associated with exceedances of existing stormwater drainage capacity because application of such mitigation would require that land use, sea level rise adaptation, and transportation projects comply with project-level CEQA review, incorporate on-site stormwater control practices, and develop and implement stormwater management plans or stormwater control design features. However, it cannot be concluded with certainty that all impacts related to this potential construction and land conversion would be mitigated to less than significant. Therefore, there may be instances where the relocation or construction of new or expanded stormwater drainage would cause significant and unavoidable environmental effects.

Comment I29-56

Since the most recent 10 years of Climate Change have seen the greatest temperature and CO2 increases in history, using only existing stormwater design standards exposes all residents to significant flooding risk and - with the creation of more impermeable surfaces - that risk is further increased. Further so-called development needs to be prevented unless it can defend against the highest peak rainfall in history, because it is only going to increase, and policies need to be designed to fund the required stormwater infrastructure which is currently unable to handle flooding in recent atmospheric rivers in many Bay Area locations, such as San Mateo County. These policy enhancements must occur BEFORE additional impermeable surfaces are created. For further details on the science and policy implications of the stormwater problem, see Chapter III and IV of Flooded With Problems - Stormwater Management on the SMC Coast; Midcoast Community Council, Mar. 11, 2025.

Response I29-56

Please refer to Response I29-54.

Comment I29-57

Further, the Plan explicitly envisions investing in resisting sea level rise (protection and adaptation) rather than promoting large-scale managed retreat as a central planning strategy. This will be futile (e.g. King Canute who could not hold back the tides) and wasteful. This proposed policy creates the failure of the Samaritan's Dilemma, perpetuating a moral hazard at the expense of the region's residents, rather than motivating behavior to avoid those risks.

Response I29-57

The commenter's viewpoint is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Resilience strategies and priorities may be refined over time through future actions by responsible agencies. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding implementation priorities.

Comment I29-58

20) Question: Will the Plan expand and reprioritize its climate-related investments to include development of improved stormwater policies and funding?

Response I29-58

Please refer to Response I29-54 and "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities."

Comment I29-59

7. Ignores Wildfire Risks and Costs

Wildfire risk is not directly modeled. The growth forecasts implicitly assume that:

1. Fire risk will not materially constrain development in designated growth areas.

2. Existing communities in high-risk zones will persist, even as risk increases.

Further there are no performance targets for wildfire exposure reduction and no assessment of the cost burdens – both in insurance and fire-fighting – involved in wildfire over the Plan period.

Response I29-59

The proposed plan designates specific Growth Geographies to guide where future household and job growth would be focused under the proposed plan's strategies over the next 25 years. Very High and High Fire Hazard Severity Areas identified by the California Department of Forestry and Fire Protection or locations within a county-adopted wildland-urban interface area are excluded from Growth Geographies. In addition, the Draft EIR identifies Mitigation Measure HAZ-7, which would promote land management in open space to reduce fire hazards and would substantially reduce the potential for the plan to exacerbate wildland fire risks. However, approval of the proposed plan would not affect the independent land use authority of local jurisdictions. Development could occur in and near State Responsible Areas and lands classified as Very High Fire Hazard Severity Areas. Wildfire hazard impacts were determined to be significant and unavoidable in the Draft EIR. The analysis in the Draft EIR complies with MTC and ABAG's obligation to disclose the potential environmental impacts of the proposed plan based on programmatic, regional-level assumptions and forecasts. Please refer to "Master Response 4: Program Level Document" regarding the level of detail analyzed for the Draft EIR. Costs are not subject to analysis under CEQA, because they are economic effects that by themselves do not constitute a physical effect on the environment. Please refer to Response I29-16.

Comment I29-60

No wildfire-related metrics are forecasted and compared on:

1.Acres treated

2.Homes hardened

3.Evacuation capacity

4.Fire-related displacement

5.No regional mitigation commitments are made.

6.No wildfire mitigation projects are funded

7.No fuel-reduction programs

8.No investments in firefighting infrastructure

9.No evacuation route upgrades explicitly tied to wildfire

10.No funding for home hardening or retrofits

Response I29-60

The proposed plan is a long-range regional plan for the nine-county Bay Area, encompassing 35 transportation, housing, economic, and environmental strategies, that provides a blueprint for how the Bay Area can accommodate future growth and achieve regional GHG emissions reduction targets established by the California Air Resources Board pursuant to SB 375. The proposed plan does not include specific wildfire acres treated, wildfire mitigation projects, and fuel-reduction programs. Please refer to Chapter 2, "Project Description," of the Draft EIR for a discussion of the proposed plan and "Master Response 4: Program Level Document" regarding the level of detail analyzed for the Draft EIR.

Regarding home hardening, the proposed plan would accommodate forecasted population growth in a manner that reduces potential contributions to climate change, encourages concentrated growth in urbanized areas and land management in open space, and includes structural hardening efforts where existing structures are vulnerable to fire. Structural hardening combats the risk in communities already built in the highest fire risk zones. Strategy EN2, Provide Means-Based Financial Support for Seismic, Wildfire, and Accessibility Home Retrofits, includes fire-resistant roofing and defensible space retrofits for 105,000 homes.

Impact HAZ-6 of the Draf EIR evaluates whether implementation of the proposed plan would impair implementation of, or physically interfere with, and adopted emergency response plan or emergency evacuation plan, which considers evacuation under emergency of various hazard scenarios, including wildfire. The analysis in the Draft EIR is programmatic, and as a result, specific details regarding the location of projects and potential impacts related evacuation capacity and the need for evacuation route upgrades are not known at this time. Mitigation Measure HAZ-6 would address the need for adequate emergency access through continued participation in the San Francisco Bay Area Regional Transportation Emergency Management Plan. It would also require that emergency plans account for shifting transportation modes and that individual projects would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Consistent with State CEQA Guidelines Section 15126.4, the Draft EIR includes feasible mitigation measures based on resources that may be affected by overall buildout, on the location of where development may occur, or on performance criteria, as appropriate for a programmatic analysis under CEQA.

Displacement of housing and people is discussed under Impact LU-4 of the Draft EIR (pages 3.11-32 through 3.11-36). Implementation of the proposed plan's forecasted development pattern, sea level rise adaptation projects, and transportation projects may result in displacement of existing residential units, necessitating the construction of replacement housing elsewhere. Significant environmental impacts associated with the replacement housing are addressed throughout this EIR. When and where wildfire would occur are uncertain at the level of analysis prepared or the Draft EIR. As such, an evaluation of fire-related displacement would be highly speculative. Please refer to Impact LU-4 of the Draft EIR for a discussion regarding displacement.

With respect to regional mitigation measures, Mitigation Measure HAZ-6 discussed above would address impacts related to evacuation. Mitigation Measure HAZ-7 would require that implementing agencies restrict development of areas mapped by the California Department of Forestry and Fire Protection as high and very high fire hazard zones where feasible and necessary. This is appropriate mitigation because restricting development in these areas would address the increased wildfire hazard. However, MTC and ABAG cannot require local jurisdictions to adopt mitigation measures. Therefore, there are no regional mitigation measures.

Impact PSR-1 of the Draft EIR addresses impacts associated with the need for new or physically altered government facilities, including fire protection facilities. The proposed plan's forecasted growth pattern would result in the need for new facilities to meet increased demand. For the purposes of the programmatic analysis, it was assumed that the construction of new or modified public service facilities resulting from the implementation of the proposed plan could result in adverse environmental effects. However, there is inherent uncertainty surrounding the location and size of future facilities, including firefighting infrastructure. Although economic impacts may be considered in a CEQA document economic changes are not a requirement of CEQA and economic changes, such as funding requirements, resulting from a project shall not be treated as significant effects on the environment (CEQA Guidelines Section 15131). Therefore, no investments for fire fighting infrastructure are identified.

Comment I29-61

The Plan does not address:

1. Rising insurance costs in fire-prone areas
2. Fire-related housing displacement
3. Post-fire rebuilding affordability
4. Equity impacts on lower-income or rural communities in the WUI

Response I29-61

The commenter's concerns are noted. Plan strategies and priorities may be refined over time, and program-level mitigation measures apply to future projects as applicable. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding implementation priorities. Please also refer to Response I29-34 and Response I29-60 for more on CEQA's requirements for analysis of economic impacts.

Comment I29-62

21) Question: Will the Plan expand and reprioritize its climate-related investments to include development of improved wildfire mitigation policies and funding?

Response I29-62

Climate change and mitigation measures are included in Section 3.6, "Climate Change, Greenhouse Gas Emissions, and Energy" and wildfire impacts and mitigation measures are included in Section 3.9, "Hazards and Wildfire" of the Draft EIR. Plan strategies and priorities may be refined over time, and program-level mitigation measures apply to future projects as applicable. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding implementation priorities.

Comment I29-63

E. Critical Issues in Process and Governance

1. Take The Plan Seriously

Because forecasts such as the Plan are often treated as vision documents, they escape the kind of forensic audit applied to financial data. However, our current regional environmental and fiscal stresses mean that we cannot treat the Plan as an irrelevant 'wish list' or justification for attracting easy Federal and State funding. Under the current Federal and State situation, that funding is unreliable. Yet the need for a thorough assessment of regional needs is vital. Thus, we require a level of rigor heretofore lacking in prior Plan Bay Areas.

Response I29-63

Please refer to Responses I29-17 and I29-51 and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources."

Comment I29-64

22) Question: Will the MTC undertake the expanded planning mission required to address the many vital questions in this DEIR response?

Response I29-64

The commenter's request is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area is updated periodically, and strategies may be refined as conditions evolve. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding implementation priorities.

Comment I29-65

2. Plan Lacks transparency

The MTC failed to hold CEQA plan comment sessions in Contra Costa, Napa, Solano, Sonoma, San Mateo and Santa Clara Counties. [Did hold sessions in SF, Alameda, and Marin]

Response I29-65

CEQA Guidelines section 21083.9 states that a lead agency is required to conduct at least one scoping meeting for projects of regional importance, but does not prescribe requirements regarding public meeting locations. To satisfy CEQA's scoping meeting requirements and provide for public participation across a broad geographic area, MTC and ABAG held a virtual scoping meeting on Wednesday, January 29, 2025, from 1:00 p.m. to 2:30 p.m. Additionally, MTC and ABAG accepted written comments by email during the Notice of Preparation comment period, which lasted for a period of 30 days from January 14 through February 13, 2025. Comments received during the public review process will be considered and responded to in the Final EIR, consistent with CEQA. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding ongoing coordination.

Comment I29-66

23) Question: Will the MTC issue an improved Draft Plan and DEIR and allow all counties affected to participate in local hearings?

Response I29-66

Please refer to Response I29-65.

Comment I29-67

Our request for details on the cost calculations was denied, and important details allowing Plan validation will only be released with the full EIR – so we, and all reviewers, are unable to assess the validity of the DEIR. (see my email from PBA staff.)[20]

[20] GAD email 11/15/25 3:49PM:

Dear PBA,

This document:

https://planbayarea.org/sites/default/files/documents/Notice_of_Preparation_Plan_Bay_Area_2050%2B_Draft_Environmental_Impact_Report.pdf

Contains numbers in a table on page A-4 for which I cannot find supporting details.

Footnotes 1 and 2, for example, do not refer to sources.

Please provide the assumptions upon which these numbers are based and/or refer me to an existing document that does so.

---------- Reply from eircomments@bayareametro.gov ----------

Thank you for your inquiry. We will provide a full response as part of the Final EIR. In the meantime, the supporting data is referenced in the Draft Technical Assumptions Report available at the following link: https://planbayarea.org/sites/default/files/documents/Draft_Technical_Assumptions_Report_0.pdf?cb=88105e79.

Response I29-67

Please refer to Response O2-1. The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-68

24) Question: Will the MTC allow an independent, expert audit of the modeling efforts to confirm validity of the approach and results?

Response I29-68

Please refer to Response I29-15.

Comment I29-69

25) Question: Will the MTC hold open the comment period on the Draft Plan and DEIR until the details of modeling and financial projections are released for public review?

Response I29-69

Please refer to Response I14-5 regarding the public review process undertaken for the Draft EIR and "Master Response 1: Regional Growth Forecast" regarding growth forecast modeling for the plan. The Draft Forecasting and Modeling Report is available for public review at https://planbayarea.org/draftplan. Please refer to Response I29-16 for a discussion on economic effects related to CEQA. Public review of the Draft EIR has met all requirements under CEQA and will not be reissued for public comment.

Comment I29-70

3. Plan Disenfranchises and Defunds Local Governments

The Plan directs money from county taxes to regional priorities, sapping resources the counties might better direct to address their priorities (e.g. wildfire and stormwater in SMC). Unelected regional bodies without independent oversight are thus overriding the priorities of our locally elected governments. Without meaningful oversight, MTC's planning uses flawed modeling that "reverse-engineers" outcomes to justify predetermined policies that override local concerns.

Response I29-70

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area does not supersede local land use authority, and implementation occurs through actions by multiple agencies. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding local land use control.

Comment I29-71

26) Question: Will the MTC consider a revised Plan that first measures and ensures the fiscal sustainability of local governance, and only then proposes additional investments and funding?

Response I29-71

Please refer to Responses I29-17 and I29-21.

Comment I29-72

4. Lack of Accountability and Oversight

Several elected officials in San Mateo County have voiced concern about the lack of Oversight of Bay Area Transit Agencies. For example, the IG of BART resigned because she wasn't allowed to do her job. And most transit agencies do not even have IG's. Currently most of 'oversight' is non-professionals reviewing expenditures 6 to 18 months after they occurred, with no authority to question them in advance of expenditure. What is needed, as an essential companion to funding any parts of a Plan, is creation of Oversight that is empowered and proactive, fully funded independently from agency management, and reporting directly to the Boards. These concerns have been previously communicated to the MTC and are attached as guidance for the design of an effective Oversight Office.[21]

[21] 2024-07-24_BAHFA Bond Oversight Committee 07 12 24. Attachment 4

Response I29-72

The commenter's governance recommendation is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area is implemented through actions by multiple agencies and does not establish governance structures for independent agencies through EIR adoption. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding MTC and ABAG's role and authority.

Comment I29-73

The Plan defines no trigger criteria by which to measure the cost/benefit success or failure of the investments desired. There is no audit mechanism to track the monies and programs. There are no contingency paths defined to change approach when projects fail to produce results. There is no provision for restitution of monies wasted if projects fail to produce promised benefits. All the risks are with the taxpayers and residents; none are with the Planners. These are fundamental changes that must occur now, before we entrust $1.5 Trillion to anyone.

Response I29-73

The commenter's recommendations are noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan strategies and implementation priorities may be revised over time based on funding availability, performance outcomes, and agency decisions. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision.

Comment I29-74

27) Question: Will the MTC recommend an independent, pro-active Oversight Office to address the above concerns?

Response I29-74

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-75

5. Unproven Modeling Approach

Or more accurately, proven wrong. Beginning with the prior Plan Bay Areas, population and transit ridership forecasts have been materially in error on the high side. There is no evidence the models used in this process have been validated or are correct. The model used in the Plan, REMI, treats population

migration as a function of economic opportunity, not from housing affordability stress or quality-of-life exit dynamics in a high-cost region.

Response I29-75

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plans forecasted growth and responses I29-10 through I29-13. In addition, please see Response I28-10 and Response I28-11 regarding transit ridership forecasts.

Comment I29-76

Regarding the models used, per the Plan: "*These processes provide technical transparency that allows peer evaluation by regional stakeholders, planners, and consultants*." Yet when we requested access to the model details, we were told to wait for the final EIR. The core Plan Bay Area 2050+ Draft Forecasting and Modeling Report does not itself publish detailed calibration statistics or procedures. Likewise, the Draft Plan Bay Area 2050+ Technical Assumptions Report and Transit 2050+ Report do not include calibration tables themselves but rather present the assumptions that feed into models.

Response I29-76

Please refer to Response I29-15. The Draft Forecasting and Modeling Report provides a link to access the Targeted Calibration and Validation Report, which summarizes the major model update and documents the targeted calibration and system-level validation of the Travel Model.

Comment I29-77

Plan Bay Area 2050 technical methodology documents explicitly note that Travel Model 1.5 was calibrated and validated to year-2015 observed travel data using actual trip counts, travel surveys, and other observed measures; a peer review of that travel demand model was conducted and discussed with "regional partners" prior to its use. There is no apparent evidence that updated calibration, reflecting the major transportation changes from the Pandemic, was used in this analysis. A peer review by unaffiliated experts is now required. And by "unaffiliated" we mean: not MTC or ABAG staff, and by no consultant previously retained to do work for MTC/ABAG or the 8 major Bay Area Transit agencies.

Response I29-77

Please refer to Response I29-15.

Comment I29-78

28) Question: Will the MTC allow time for peer review of its technical methodology and results by unaffiliated experts, before finalizing the Plan and EIR?

Response I29-78

Please refer to Response I29-15.

Comment I29-79

F. Recommendations and Conclusions

In sum, this Plan is inadequate to the needs of the Region. The DEIR itself acknowledges in Mitigation Measure PUF-1(f) that 35 issues have Significant and Unavoidable (SU) environmental effects, including construction of new or expanded water, wastewater, stormwater, power, natural gas, or telecommunications facilities. Yet the Plan does not prioritize or fund the very infrastructure required to address these essential services. Instead, from the perspective of many local jurisdictions, it prioritizes lower-priority projects, particularly in the transit and housing domains, while leaving unfunded the mitigation of climate, social, and infrastructure risks that bear directly on regional survival and affordability.

Also, as detailed above, the Plan fails in other areas of its scope and execution to assess reasonable alternatives and even the current fiscal condition of the region, upon which any viable plans must rest.

Response I29-79

Please refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable findings of the Draft EIR. Please refer to "Master Response 3: Plan Alternatives" for a discussion of alternatives and the reasonable range of alternatives discussed in the Draft EIR. Please refer to Response I29-16 for a discussion on social and economic effects related to CEQA.

Comment I29-80

A critical suggestion about issues that a regional plan should address is found in the Plan's Economic Vibrancy section:

"The overwhelming majority of public comments related to economic vibrancy focused on the negative impacts of inflation and the high cost of living in the Bay Area. Residents also commented on low or stagnant wages, the job market and income inequality"

A truly comprehensive plan for the Bay Area would establish key success factors for those issues as well as overall fiscal sustainability of the region, would define the linkages between investment and policy decisions, would define how to audit the accomplishment (or lack thereof) toward improvements, and would provide accountability for those making bad decisions or failing to properly execute projects – including terminating their charters. A truly comprehensive regional plan would establish measurable social benefit targets for: cost of living, wealth and income inequality, median household income, unemployment metrics, educational outcomes, and public health.

Response I29-80

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The commenter's recommendations are noted. Plan strategies and performance evaluation may be refined over time. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding plan revision and implementation priorities.

Comment I29-81

For regional institutions, the factors a Plan should consider include: fiscal sustainability, unit cost performance, return on assets, operating margin, and the Plan would include monitoring project performance to both project budget and economic payoff over time with transparent reporting and consequences for failure. Note that major transit projects in the Bay Area are notorious for being massively over budget and for failing to achieve ridership and financial payoff, yet restitution to taxpayers and sanctions for the offending agencies have both been absent.

Response I29-81

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The commenter's governance recommendation is noted and will be forwarded for consideration. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding ongoing coordination and regional partnership.

Comment I29-82

The Plan begins by continuing the history of prior such Plans, with unrealistic forecasts, and compounds that flaw by failing to consider a variety of alternative strategies to reimagine the region's future with emerging, modern transportation and telecommunications technologies. Instead, the Plan should begin at the beginning, by assessing the climate and fiscal stresses in the region, by asking local governments

for their priorities, and by incorporating a range of alternatives and sensitivity-testing into its plan scenarios.

Response I29-82

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-15, Response I29-80, and Response I29-81.

Comment I29-83

The Plan focuses overly on Transit and Housing, while assuming all the other aspects of our regional infrastructure will largely take care of themselves. It proposes continuing funding favored legacy infrastructure without evaluating competing strategies utilizing emerging modern alternatives such as tele-commuting and autonomous vehicles. And it proposes new funding for its favored partners (transit and real estate interests), while NOT proposing funding for cities, counties, schools and public works institutions which are all under severe fiscal stress. At the same time, it ignores real, expanding threats from climate change such as stormwater flooding, wildfire, and drought. Finally, the Plan lacks necessary financial analyses upon which any viable plan must rest:

A. Assessment of the fiscal condition and needs of the region's cities, counties, health care institutions, schools and public works institutions, and,

B. Comparison of the cost-of-living impact on existing residents from the current situation, the emerging climatic future, and any allowed, sustainable population expansion.

Response I29-83

The Draft EIR discloses impacts related to these environmental resources in Sections 3.6, "Climate Change, Greenhouse Gasses, and Energy;" 3.9, "Hazards and Wildfire;" and 3.10, "Hydrology and Water Quality." Please also refer to Response I29-17. Please also refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" for more on the role of MTC/ABAG in promulgating the proposed plan.

Comment I29-84

This Plan and the related DEIR must be firmly rejected, and redone, to address the points made herein, as well as to address comments from others in the region.

Response I29-84

The comment does not raise specific environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Responses I29-1 through I29-83 for responses to previous comments provided by the commenter. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-85

G. Requested Actions

The following requested actions are drawn from and consistent with the analysis above:

1. Revise demographic and economic forecasts

Revise the Plan's population and employment forecasts to align with California Department of Finance projections and recent migration, fertility, and affordability trends, and sensitivity-test flat and negative growth scenarios across all alternatives

Response I29-85
Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth.

Comment I29-86
2. Conduct a comprehensive regional fiscal and infrastructure baseline

Before finalizing investment priorities, prepare and publish a comprehensive audit of the fiscal condition and capital needs of the region's cities, counties, schools, health systems, water and wastewater agencies, stormwater utilities, and power providers, including identification of structural deficits, unfunded liabilities, and asset replenishment requirements.

Response I29-86
The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-17.

Comment I29-87
3. Develop and fund regional water and stormwater resilience programs

Establish a funded regional program for water supply and stormwater resilience that:

- Incorporates updated climate science and modernized probable maximum precipitation estimation methods;
- Explicitly analyzes affordability impacts on existing residents; and
- Conditions approval of new growth and impermeable surfaces upon demonstrated capacity to manage future flood and drought risks.

Response I29-87
The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan strategies and priorities may be refined over time, and program-level mitigation measures apply to future projects as applicable. Please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities" regarding implementation priorities.

Comment I29-88
4. Integrate wildfire risk reduction into the core Plan

Incorporate wildfire risk explicitly into land-use and transportation planning by:

- Setting regional targets for acres treated, homes hardened, evacuation capacity, and displacement risk reduction;
- Funding wildfire mitigation projects and evacuation route upgrades; and
- Assessing insurance, rebuilding, and equity impacts on WUI communities.

Response I29-88
The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-40.

Comment I29-89

5. Evaluate and incorporate emerging mobility and telecommunications alternatives

Direct staff to evaluate autonomous vehicles, ride-hail, vanpools, demand-responsive shuttles, express bus networks, and broadband expansion as core strategies, with full lifecycle cost and performance comparisons to existing transit systems, and incorporate cost-effective alternatives as funded elements of the Plan.

Response I29-89

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-40.

Comment I29-90

6. Standardize and fully disclose cost metrics and project financials

Require that all major projects report both constant-dollar and year-of-expenditure costs using consistent assumptions, and publish detailed lifecycle financials—including capital investments, revenues, operations, maintenance, and asset replenishment - for at least the first asset life cycle of each project.

Response I29-90

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-40 and Response I29-17.

Comment I29-91

7. Strengthen oversight and accountability for regional investments

Create an independent, well-funded oversight office with authority to review and approve major expenditures in advance, to audit performance against cost and benefit expectations, and to recommend management or project changes and/or cancellations when results fall short, with public reporting on outcomes.

Response I29-91

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-72.

Comment I29-92

8. Rebalance the Plan's scope to include core civic services

Expand the Plan's scope to evaluate needs and propose funding and policies for schools, health care, water, wastewater, stormwater, power, and telecommunications, proportionate to their essentiality for residents, rather than concentrating new funding primarily on transit and housing.

Response I29-92

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I29-17.

Comment I29-93

9. Improve transparency, outreach, and technical documentation

Hold formal DEIR and Plan comment sessions in all nine Bay Area counties; release key technical assumptions, model documentation, and calibration statistics during the draft period; and subject core model analyses (including REMI and Travel Model 1.5) to independent peer review by unaffiliated experts.

Response I29-93

Please refer to Response I29-15 and Response I28-11.MTC and ABAG are not required to independently peer review modeling assumptions and findings. Please refer to Response I14-5 regarding the public review process for the Draft EIR. CEQA does not require comment session in every county in which a project is located.

Comment I29-94

29) Question: Which, if any, of the above recommendations will the MTC adopt in creating an improved, and essential, Plan Bay Area?

Response I29-94

Please refer to Responses I29-1 through I29-93 regarding the commenter's recommendations. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I29-95

H. Author's Background

Born and raised in the Bay Area, Mr. Dieguez until recently served as elected Chair and member of the Midcoast Community Council in San Mateo County. He has been heavily involved in the infrastructure of the Coastside since 2012, including: water, sewer, stormwater, telecommunications, wildfire and schools, and has authored over 100 articles on local issues in the past decade. He has consulted on financial and infrastructure matters with Elected Officials in the adjacent cities of Half Moon Bay and Pacifica. In 2003, he co-founded the MIT Club of Northern California's award-winning Energy & Environment program, which became the largest alumni program in the nation. In his career he used, developed, and trained others in computer simulation technologies for financial modeling, work flow modeling, and System Dynamics modeling. He has submitted proposals on infrastructure accounting to the GASB in order to quantify fiscal sustainability, and been invited to testify and comment further.

Response I29-95

The comment describes the commenter's qualifications and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I30 Gregg A. Dieguez 2

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I30-1

A. Framing Comment

A Valid Need, Unmet By Plan Bay Area 2050+

This is indeed a most logical time for the Bay Area to create a regional plan to address the multiple crises facing it. A combination of "fiscal cliffs" and "structural deficits" threaten the continued viability of many cities, counties and public works agencies. The Climate Crisis has begun to take a toll in wildfire, flooding, windstorms, and drought. The current federal administration policies of withholding long-established sources of funds, together with the projected California state budget deficits, greatly reduce hope for outside intervention to fund solutions to our manifold problems – at least for several years. Meanwhile, important innovations in energy, telecommunications, and transportation offer hope for more affordable, clean, and agile solutions to some of these problems – if policymakers will allow their adoption.

The current draft of Plan Bay Area 2050+ (hereinafter: "the Plan") deals successfully with almost none of these issues. Instead, the Plan focuses mostly on Traditional Transit and overblown estimates of housing needs, and fails to provide even the funds for the initiatives it proposes, let alone addressing the Fiscal Cliffs faced outside of the Transit and Housing Industrial Complex (THIC). Further, it admits most of the 'environmental' impacts of its proposals are Significant and Unavoidable, while also lacking analysis of better alternatives and proposals to address more important priorities outside the limited circle of issues it chooses to address – albeit inadequately.

Below are some concerns about the DEIR. **The bulk of these issues and questions relate to Mitigation Measure PUF-1, which relies on local governments and agencies for much mitigation and which lists impacts for 35 items as Significant and Unavoidable.**

However, because there are so many important omissions in the current Plan and DEIR, it is not possible to link every comment to a current Mitigation Measure. For that reason, we have included a numbered series of questions throughout the text, which are also listed in the Table of Contents.

1) Question: Will the MTC reissue another Draft EIR with an extended comment period after addressing the deficiencies extant in the current Draft Plan and engagement process?

Recommendations for improvements in the plan are imbedded in these comments and are summarized in the last section.

B. Methodological Issues Affecting Validity of Conclusions

The Plan modeling is based on a population forecast which is 12+ times higher than likely – 24% vs. 1.9% - and far higher than the expert Demographic Research Unit at the California Dept. of Finance has projected.

By inflating growth projections, the Plan creates an artificial sense of crisis—while ignoring the real issue of affordability. The Plan's population forecast is derived from a jobs forecast… that is untethered to reality. A population forecast based on actual demographic trends would be 1.9%, less than one TWELVETH of the 24% in Plan Bay Area. And there's a real chance the region will decline again, as it has in recent years, due to changes in immigration policy, our unaffordable cost of living, and our aging demographic. A realistic estimate of Bay Area population growth is contained here, with a full description of the demographic method used and a critique of the Plan's approach: MTC/ABAG's Bay Area population projections are way too high. In fact, the Calif. DRU numbers were quite specific in refuting a population growth of 10 million + Californians by 2050. Long term, the population is expected almost flat out through 2060, as shown in their official spreadsheet: https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P1A_State_Total.xlsx

The Plan forecast estimates regional employment will grow by approximately 1.4 million jobs between 2020 and 2050, reaching about 5.4 million total jobs by 2050. This forecast establishes the total number of jobs expected in the region in the absence of specific land-use or transportation interventions and without causal modeling justification. Regional job totals through 2050 are kept consistent across all scenarios (Proposed Plan, No Project, and other alternatives) with the exception of internal spatial distribution differences. The analytic process is backwards, taking a fixed result, rather than exploring alternatives which create differential job and population growth.

2) Question: Will a revised Plan align growth assumptions with California Department of Finance (DOF) and Demographic Research Unit (DRU) projections?

3) Question: Will a revised Plan consider an alternative with demographically driven population estimates, which may project flat to declining population growth?

And all jobs are not equal; in terms of their income and tax contributions and the transportation burden they create. With remote work options, workers in Bay Area companies are already living in Utah, Texas and other more affordable states. the Plan does not build remote work into its core population or jobs forecast as a structural driver of regionwide workforce relocation; the Plan does not explicitly model or forecast the impact of remote work enabling Bay Area workers (i.e. taxpayers) to relocate permanently to other states or more affordable regions. There is an important dynamic that must be evaluated, and is not, regarding what regional programs grow the fiscal sustainability of the region, and which undermine it.

One of the senior modelers involved in the Plan - Mike Aronson - an author of the Plan impact report, punctuates the unreliability of modeling when given bad, incomplete or biased assumptions:

"*Like all efforts to predict the future, traffic forecasting is not a foolproof science. Senior Principal Engineer and experienced travel demand modeler Mike Aronson emphasizes that a model is only as good as the inputs and assumptions that go into it. "If those assumptions are inflated, the long-range traffic forecasts very often outpace the reality of traffic growth," says Mike. "This is not the fault of the model; it's a byproduct of the land use assumptions*."[1]

[1] https://www.kittelson.com/ideas/myth-busters-are-long-range-traffic-forecasts-the-best-tool-to-guide-decisions-about-our-streets/

Studies of Metropolitan Planning Organizations (MPOs) in California and other states have found that long-range forecasts frequently overshoot actual population and employment growth, leading to transportation demand models that justify larger infrastructure projects. This matters for the following reasons:

Funding Incentives: MPOs that project higher growth can justify larger capital programs, which makes them more competitive for discretionary federal grants.

Transparency Gap: Unlike fiscal audits, MPO demographic forecasts are rarely subjected to independent verification, leaving local governments and residents with little recourse when projections prove inaccurate.

Policy Risk: Overestimated growth can lock regions into overbuilt infrastructure, higher debt loads, and misaligned land-use policies.

We need to avoid those risks, and that requires additional analysis before outlining multi-billion-dollar social investments.

Responsible planning must use real numbers, or "risk(s) eroding public confidence," as state Auditor Michael S. Tilden wrote in his March, 2022 assessment of RHNA numbers' methodology. "*As directed by*

the Joint Legislative Audit Committee, my office evaluated the Regional Housing Needs Assessment ...Overall, our audit determined that HCD does not ensure that its needs assessments are accurate and adequately supported...This insufficient oversight and lack of support for its considerations risks eroding public confidence...” [2]

[2] https://information.auditor.ca.gov/reports/2021-125/index.html

Lastly regarding the population estimate, any serious planning exercise must envision a scenario wherein Bay Area population growth is flat or negative – as in recent years. And the plans must be sensitivity tested and adjusted for those alternative scenarios, rather than intransigent insistence on the same population and jobs numbers in all scenarios.

4) Question: Will a revised Plan derive jobs and personal income forecasts from causal factors, rather than plugging a desired jobs number into all scenarios?

5) Question: If the forecasts for population, jobs, and transit ridership are biased and overstated, how can the MTC properly analyze the program/project DEIR relative to CEQA established thresholds of significance?

C. Analytical Gaps, Bias, and Policy Misalignment

1. Omission of Critical Services and Requirements

Even more important than the flawed jobs and population estimates is what the Plan omits. It fails to begin with an audit of the fiscal sustainability of the region: cities & towns, public works, schools, hospitals, as well as transit systems – all of which are under fiscal stress. Lacking that baseline audit, the Plan is clueless as to the size of competing priorities for funds. Many cities are in fiscal stress with so-called ‘structural deficits’, and require more funds just to continue services. As many of the topics and mitigation issues in the Plan and DEIR are delegated to local jurisdictions for resolution, the Plan is untethered to reality in expecting towns and public works agencies to handle more growth and mitigation projects.

Note also that this planning process began before California’s recent infrastructure grade of “C-“. Without concentrating on failing infrastructure, our regional is unsustainable.[3]

A major determinant of the success of any plan will be the economic vitality of the region. Yet this was deemed outside of scope by the planners: “Economy revenues have not been inventoried for this plan due to MTC and ABAG’s lack of authority, financial resources and technical capacity."[4] How can this plan assess the payoff of at least $1.5 Trillion in spending if it can't attribute investments to economic outcomes?

6) Question: Will the MTC expand its analysis to model the regional economic payoff on the proposed Plan investments?

[3] https://www.asce.org/publications-and-news/civil-engineering-source/society-news/article/2025/12/03/asce-california-section-releases-infrastructure-report-card

[4] Draft Plan Bay Area 2050+, Section: Definitions of Revenues for plan elements, page 43.

Among many issues, the Plan ignores funding needs in health care, education, power, and stormwater. The Plan does not propose any energy supply projects / infrastructure, or address the funding requirements and sources of funds for energy supply or efficiency projects, or assess the affordability implications for residents of impending trends such as AI datacenters.

The Plan acknowledges that more population and housing growth will put upward pressure on schools (infrastructure needs and service demand), but it does not itself calculate or allocate specific funding for new schools, school operating budgets, or school debt service in the regional plan documents. The regional plan and DEIR assign mitigation responsibility to the local governmental entities that operate and fund those services (e.g., school districts, cities/counties). School infrastructure and operating costs resulting from growth are not paid for by the Plan as a regionwide revenue program. Instead, local school districts, local governments, developers (via fees), and state/federal education funding mechanisms are the entities expected to address growth-related school needs. Yet we have substantial history in California indicating that school funding is already inadequate. The Plan must address this shortcoming, both as a matter of social equity, and to secure the economic vitality of the region.

Health care is also not properly considered in the Plan. This omission is consistent with the Plan's prior, traditional role as a regional transportation plan (RTP) and sustainable communities' strategy (SCS) — which is not intended to function as a comprehensive social services or health system planning document but instead to shape growth patterns, infrastructure investment frameworks, and environmental outcomes. And that is a fatal flaw in the Plan.

Any truly 'sustainable' community plan must include consideration of supply and affordability of services such as health care, education, water, first responders, and energy. By proposing a lot of 'transit and housing' initiatives and omitting vital related services, and by omitting consideration of the severe fiscal stress on governments and public agencies throughout the region, the Plan appears as a self-serving "me first" document for the Transit and Real Estate industries which would leave solving all the real problems in the laps of an overburdened, underfunded county, city, and public works governance.

The stressed condition of our local governments and agencies clearly indicates that they are at present unable to manage growth sustainably, especially from a fiscal perspective. The concept of a 'structural deficit' sounds like a valid excuse, when it is merely the cumulative impact of many bad financial decisions over time. There is an unfilled and important role required, by the MTC or some other authority, to provide policies which enable local governance to manage affairs in a fiscally sustainable manner.

7) Question: Will the MTC expand its planning and analysis to include the fiscal sustainability and viability of essential services such as health care, education, water, wastewater, stormwater management, wildfire mitigation, first responders, evacuation capacity, and energy?

8) Question: Will the MTC expand its Plan recommendations to include improved policies for local governance growth management to ensure both environmental and fiscal sustainability?

2. Omission of Transit Strategy Alternatives

The Plan analysis acknowledged that autonomous vehicles are a major source of uncertainty in future transportation, noting potential implications – but not analyzing alternative transit strategies - such as:

1. AV's increasing commute feasibility, but also reducing the attractiveness of transit or biking,
2. EV AV's further reducing GHG's below traditional transit levels.
3. Cost savings from distributed transit alternatives

Strategy EN9 is the only mention of vanpool alternatives, which are an unstated fraction of the $2 Billion in that strategy. This represents less than 0.4% of the projected Transit costs, and is likely the most cost-effective and convenient alternative with the potential to save large amounts of transit infrastructure, operating costs, and GHG emissions. We find no cost per mile or convenience comparison with the more expensive and less convenient traditional transit alternatives.

No distinct autonomous vehicle or ride-hail strategy is explicitly included among the 35 the Plan strategies for funding or implementation. Ride-hail and taxi trips are captured in modeling and forecasts (e.g., commute mode share), but there are no plan-directed policies specifying how autonomous vehicles will improve service or reduce transit costs. The Plan's core transportation emphasis remains on traditional transit improvements, integration, and system optimization rather than substituting emerging, agile and affordable mobility technologies. In addition, the Plan lacks any projection of the ongoing capital and operational costs of these affordable, emerging alternatives compared to the Traditional Transit now extant.

The Plan needs to consider Alternative Future Visions, especially for Transit. One alternative that one would expect would be to expand automobility options – widen freeways, improve arterial, collector, and residential street capacity, develop new lands OUTSIDE of the growth limits, etc. Encourage remote work and shopping. For transit, focus on the cheap, easy, and low risk, including long-haul commuter express bus service, particularly on Bay Area Expressways, and expand the Expressway network. Expand vanpool services in neighborhoods for convenient short haul trips, including to and from transit stops.

9) Question: Will the MTC expand its analysis to evaluate the comparative cost/benefit of alternatives to traditional transit instead of only 'more of the same'?

3. Omission of, and Bias in, Transit Decision Criteria

More broadly, the Plan establishes no cost or performance benchmarks for the performance of transportation alternatives, no binding financial performance metrics (e.g. cost per passenger mile, full trip cost from origin to destination, etc.) and no comprehensive service metrics (e.g. travel time from origin to destination) by which proposed programs and competitive alternatives could be assessed for viability and monitored on an ongoing basis.

The benefit criteria used in Appendix 2 of the DRAFT Transit 2050+: A New Vision for the Bay Area's Transit Network document are unauditable, undocumented, and likely illusory, such as: Accessibility, Transit Crowding, Freeway Reliability, Vehicle Ownership, Environmental, Health and Safety. Rather than allow a competitive market for transportation to indicate what residents prefer, this framework tells people what's good for them. The transit ridership statistics in the Bay Area make it very clear that, even with 80% of transit costs being paid by someone other than the riders, people have already decided what is best for them.

For the 54 transit projects there are Benefit-Cost Ratios without full supporting data or explanation. One basic financial analysis element should be to detail annual costs and revenues from project operation through the first lifecycle of the involved assets, with those costs including capital costs, operations and maintenance, and eventual asset replenishment costs. All that are disclosed in Attachment D are lump summary costs with no explanation of revenues, assumptions, or annual timing. The financial payoff is not disclosed.

The benefit criteria used in *Appendix 2 of the DRAFT Transit 2050+: A New Vision for the Bay Area's Transit Network* lack supporting detail and there is no known method of auditing the results. Those benefits are: Accessibility, Transit Crowding, Freeway Reliability, Vehicle Ownership, Environmental, Health and Safety. Rather than allow a competitive market for transportation to indicate what residents prefer, this framework tells people what's good for them. The transit ridership statistics in the Bay Area make it very clear that, even with 80% of transit costs being paid by someone other than the riders, people have already decided what is best for them. This "cost-benefit" process amounts to justifying hard costs with imaginary benefits, while hiding the financial losses from examination.

10) Question: Will the MTC employ auditable financial measures and project financial payoff for the proposed projects, in addition to the 'soft benefits' currently utilized to justify them?

4. Analytical and Policy Bias

Plan modeling is based on attaining a jobs goal and driving spending based on that, rather than modeling interactive growth of population and jobs. Inflated jobs forecasts inflate population forecasts and lead to overstated transit demand, which lead to overstated funding requests.

Forecasts are not neutral: They are designed to support a narrative of growth and investment, which makes them political tools for intrenched transit and real estate interests.

Inflated job forecasts automatically inflate population projections, then housing needs, and then infrastructure costs. "Jobs as the Anchor Variable", or initial assumption, is a fatal logic flaw.

What is stated as a desirable goal is actually an indication of narrow thinking in the Plan:

"To promote job growth and economic opportunity, Plan Bay Area 2050+ envisions revitalized clusters of job training and employment opportunities, with employers incentivized to locate in-person jobs near these regional economic hubs and boost downtown activity by 2050."

The goal should not just be jobs, but more INCOME for job holders, and/or less personal expenses. The goal should not be to boost decaying downtowns and exacerbate congestion by requiring commutes to work and shop, but to attract jobs where people want and can afford to live, and to allow them to NOT commute very far for work, shopping, or services – for example by utilizing telecommunications. The expense of inner-city living is part of our affordability problem and the housing that is being constructed under current State housing policy is largely $1M per unit market rate rental apartments, and unaffordable by many - and that is because investors need a return on the large construction costs of dense urban apartments. Distributing housing to cheaper land can reduce costs.

Further, it is simplistic to think that spatial location is a prime driver of economic development. While transportation, affordable housing, and workforce quality are certainly contributors to attracting companies and workers, more relevant to job creation and retention are: universities, raw materials, shipping, energy, access to capital, cost of living, and taxation – all compared to competing regions. A broader and deeper analysis of economic development must underpin any regional jobs forecast and plan.

To be consistent and comprehensive, a true Plan Bay Area should either omit all funding for Transit and Housing, as it omits such funding for all the essential local services listed previously, OR the Plan must also consider concomitant funding programs for all essential services and infrastructures in proportion to their priority for residents. Note finally that water, wastewater treatment, power, and flood control – among others - are aspects of infrastructure which have fewer ready substitutes than transit, and should take priority in funding.

11) Questions: Will the MTC project the funding required for all actions required to support its Plan, including those required by local governments and agencies, rather than just projecting funding for the currently envisioned strategies? If not, how can it consider this DEIR complete and the Plan a valid document?

5. Inadequate Water Supply Considerations

Water supply problems, which are obviously a concern at our current levels of population (witness the State Water Board November hearings on the Bay Delta Plan water fights), are casually dismissed and not considered for funding by the Plan, even as DEIR Section 3-14 repeatedly mentions the need for supplemental supplies under conditions of 'gradual population rebound':

"It is possible that demand in the SCWA could exceed the county's supply, which would require the county to acquire additional sources from other counties in the region or elsewhere."

The plan admits there is risk and uncertainty about water supplies:

The uncertainty of water supply availability is furthered by the plan's 2050 horizon being 5 to 15 years further than water agencies' 2015 and 2020 UWMPs, which have a planning horizon of 2035 or 2045. The increase in population-, household-, and jobs-related demand on water supply coupled with potentially reoccurring drought conditions may result in insufficient water supply to serve the plan area.5

Yet the plan provides neither analysis, recommendations nor funding for where and how the additional water is to come. The Plan presents a 24% population growth, but no analysis of the water supply and water cost burdens. The Plan does not commit to funding or building major water-supply infrastructure (e.g. new reservoirs, desalination, large recycled-water systems (Note that BAWSCA had $23 Billion in water resilience project estimates 2 years ago). Instead, it leaves those actions to local water agencies and jurisdictions, while using demand management as the primary lever.

In fact, water demand section of the DEIR appears to contradict the Plan's 24% projected surge in population growth:

"*Although the Bay Area's population grew steadily for several decades, recent estimates indicate a slight downward population trend since 2020, largely driven by out-migration and other factors (DOF 2023). Despite this recent decline, many water agencies project that long-term population in the region will either stabilize or gradually rebound and thus continue to influence water demand in the coming years (MMWD 2021; SFPUC 2021; EBMUD 2021).*" [6] [underline added].

[6] PBA DEIR, Section 3.14-11

The consideration of drought risk dramatically understates the potential impact of Climate Change on water availability. The Plan cites only 20th and 21st Century droughts and characterizes them as "the driest five years on record for the state". This characterization ignores the obvious acceleration of temperature increases, early snow melts, and changes in precipitation patterns that have all increased markedly since the 2016 and prior years data cited. This summary also ignores the fact that the longest droughts in the West were 140 and 200 years in the Middle Ages.[7] Those droughts were due to natural climate variability BEFORE human-caused climate change, which will make things worse for the thousands of years that excess CO2 persists in our atmosphere and oceans. As pointed out by the author of that paper:

"*Dr. Stine, who reported his findings last month in the British journal Nature, says that California, like Tiwanaku, presents* ***"a classic case of people building themselves beyond the carrying capacity of the land****," which is determined not by wet times but by dry ones. "What we've done in California is fail to recognize that there are lean times ahead," said Dr. Stine, "and they are a lot leaner than anything we've come up against" in the modern era."*

[7] **California Droughts in human history.** https://www.nytimes.com/1994/07/19/science/severe-ancient-droughts-a-warning-to-california.html Beginning about 1,100 years ago, what is now California baked in two droughts, the first lasting 220 years and the second 140 years. Each was much more intense than the mere six-year dry spells that afflict modern California from time to time, new studies of past climates show. The findings suggest, in fact, that relatively wet periods like the 20th century have been the exception rather than the rule in California for at least the last 3,500 years, and that mega-droughts are likely to recur.

Side Note: in the Paleo climate records, California droughts exceeded 1,000 years. Again, this happened with only NATURAL climate variability.

The Plan recognizes drought risk[8], but does not propose to act on, or fund mitigation for it, as it does for Sea Level Rise. The Plan expects existing residents as well as new projects to increase conservation allowing population growth at their expense, and does not assess affordability or quality of life impacts on residents. Yet the Plan goes to great length to assess affordability and quality of life issues for transit users, which are a far smaller proportion of the affected region. This analytic inconsistency must be remedied.

[8] DEIR 3.14-13

The Plan's failure to recognize both California climate history and the probable future Climate Change impacts to water supply is another dangerous flaw. A more appropriate planning approach would have been to consider significant funding for water supply resiliency for the existing population (as opposed to say, UBI), and recommend policies to make growth pay for itself and bring its own water, instead of placing the costs and risks on existing residents. Further, significant analysis is required to assess whether the cited Newsom legislative actions[9] are sufficient to secure affordable water for current residents, and at what impact to resident affordability thereof, and what further actions need be taken to secure sustainability of our regional civilization. The Plan ignores these critical matters. As drought risk is far more immediate than sea level rise, this oversight is inexcusable.

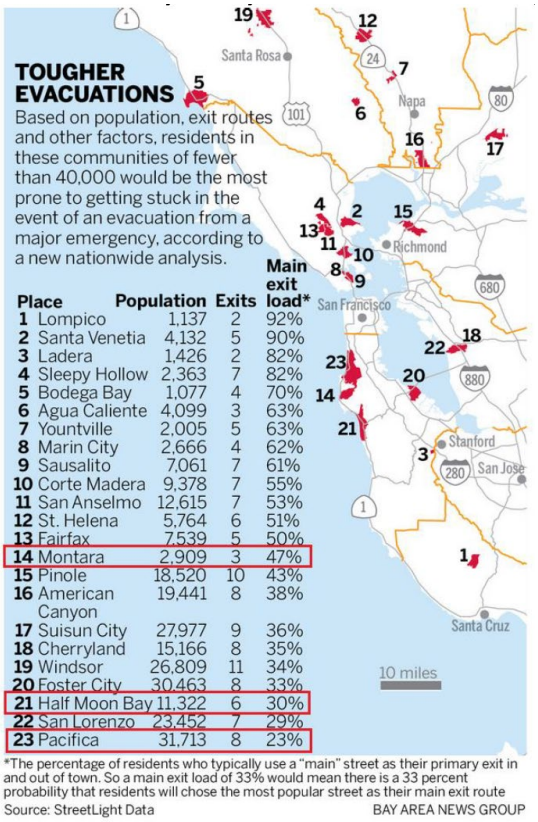
12) Question: Will the Plan be upgraded to reflect and fund mitigation of the water supplies required to support the projected population?

[9] DEIR section 3.14-12

6. Misguided Housing Considerations

Plan Bay Area is building housing when we don't need housing. Of course, State housing policy is forcing unjustified RHNA numbers on cities and counties, but that doesn't mean serious planners have to ignore the flaws in State housing policy. The Plan should objectively assess whether housing units are required, and of what type, rather than accept top-down dictates that are already unreasonably stressing local governments.

Planning assumes all areas must urbanize, without considering realities on the ground local governments are struggling with. Forcing density into hazardous areas without adequate evacuation egress – such as my unincorporated area of San Mateo County [*Map, left*] – will couple catastrophic events with horrific human casualties.



Place	Population	Exits	Main exit load*
1 Lompico	1,137	2	92%
2 Santa Venetia	4,132	5	90%
3 Ladera	1,426	2	82%
4 Sleepy Hollow	2,363	7	82%
5 Bodega Bay	1,077	4	70%
6 Agua Caliente	4,099	3	63%
7 Yountville	2,005	5	63%
8 Marin City	2,666	4	62%
9 Sausalito	7,061	7	61%
10 Corte Madera	9,378	7	55%
11 San Anselmo	12,615	7	53%
12 St. Helena	5,764	6	51%
13 Fairfax	7,539	5	50%
14 Montara	2,909	3	47%
15 Pinole	18,520	10	43%
16 American Canyon	19,441	8	38%
17 Suisun City	27,977	9	36%
18 Cherryland	15,166	8	35%
19 Windsor	26,809	11	34%
20 Foster City	30,463	8	33%
21 Half Moon Bay	11,322	6	30%
22 San Lorenzo	23,452	7	29%
23 Pacifica	31,713	8	23%

Density, so far under new laws, provides about 85% market rate housing. Lower income populations are further priced out, with no ownership possibilities. The real issues are Affordability and Wealth inequality, and current housing policy subsidies enrich the already-wealthy investors while denying equity in their residences to residents – sentencing them to rent slavery (and to continuing complaints about rent control). Better policy is to give equity in their housing to the residents, to reduce wealth inequality and stop subsidizing wealthy investors.[10]

[10] Attachment 1 repeats testimony on this issue given at the MTC in 2024.

Per an interview with Jay Forrester of MIT, who wrote the book on Urban Dynamics with major city mayors, low-cost housing poses serious risks for economic viability: "*Because low-cost housing uses up land that could have been used for job-creating opportunities while it pulls in people that need jobs*.", thus any housing strategy must be paired with job access and ownership opportunities.[11] Since the State will not do this, it is imperative that our regional governance create and advocate for housing strategy that makes economic sense.

[11] "we found that the most powerful leverage point in the urban system with respect to stagnation and poverty in the city - the most powerful leverage point was the building of low-cost housing. And, in fact, you should take it out, not put it in. Because low-cost housing uses up land that could have been used for job-creating opportunities while it pulls in people that need jobs. It's a double-edged sword for creating poverty, because it concentrates people who need jobs in locations where there are not jobs. And then as the poverty gets worse, there's more pressure to provide housing. So it's a cycle that can carry the city into a very depressed state" https://www.informs.org/content/download/368207/3846897/file/JayWForresterOralHistory.pdf

13) Question: Will the Plan be updated to evaluate the reasonableness of State RHNA requirements, and to define improved State housing guidelines?

14) Question: Will the Plan expand its considerations of increased home ownership to include defining policy and funding alternatives for housing which allow residents to own equity in their dwellings, including apartments - thus reversing trends in wealth inequality in the Region?

7. Failure to Capitalize on Telecommunications Opportunities

The Plan recognizes some of the needs and benefits of improved Telecommunications in the Region. However, it fails to allocate funding for telecommunications infrastructure projects or broadband affordability programs, or to analyze the economic cost/benefit of such improvements. Improved internet speed and availability are widely recognized as:

1. A matter of social equity for access to opportunity
2. Critical to work and shop from home job opportunities
3. Important in reducing greenhouse gases by reducing job commuting and shopping trips
4. Important in access to health care services
5. Important in modern education
6. A stimulus to job creation & employment in the region

Improved telecommunication is clearly one method to reduce the time and cost burdens of traditional transit, yet the Plan does not propose a strategy for broadband expansion, equity in digital access, or network modernization, nor does it propose regional investment programs or direct funding for broadband deployment as a core plan strategy. One major alternative path of analysis needed is to compare scenarios where improved telecommunications are deployed, and the increase in employment

opportunities and quality of life, and the resulting cost decreases in education, healthcare, transportation & pollution are evaluated against the currently subsidized traditional transit scenarios.

Thank you for addressing my concerns.

15) Question: Will the Plan develop and evaluate alternative scenarios which use policies and investments to capitalize on the efficiencies of modern telecommunications?

8. Omission of Improved Transportation Network Design Alternatives

The Plan ignores the major problem causing high transit costs: the network design. Traditional transit is designed on the premise that high capacity is needed for peak periods where the system must move "*Everyone from Everywhere All At Once*" to the same urban cores. That design has caused the enormous costs present today, and that fixed infrastructure lacks the flexibility to de-scale and relocate to meet the new demands of a more distributed work & shop from home reality. The Plan proposes only modest, incremental changes to the traditional transit network. In a Plan costing $1.5 Trillion and taking 25 years to effectuate, fundamental redesign of the transit network and employment landscape is certainly a relevant alternative to evaluate.

Redesign of employment centers to a decentralized mode, such as the ring of high-tech employment around Boston on Route 128, will obviate the need for expensive fixed-rail systems and allow people faster, shorter commutes to places of work, wherever physical attendance is required. Such a regional diversification will also avoid paying high costs for office space in crowded cities, attracting more start-ups at cheaper locations (assuming telecommunications are provided – see above). Hopefully those start-ups will mature and attract even more decentralized employment. The flexible transit infrastructure needed should be less expensive, as more people can drive or bike to work without central artery congestion. And a properly designed agile transportation infrastructure to efficiently support that decentralized network can adjust – up or down – in or out – to an evolving job and residence landscape going forward. The Plan needs to provide analysis of such a decentralized structure and show what transit infrastructure can be retired, and created, to serve a more efficient network design, and to scope the capital and operating costs and revenues which are required.

One major premise of the Plan is a fossilized Traditional Transit network:

"Fully funding the Bay Area's existing transportation system remains a top priority under MTC's longstanding 'Fix It First' Policy. First and foremost, the plan identifies funding to operate and maintain our existing network of transit routes, roads and bridges."[12]

That approach blinds planners and the public from a critical examination of the cost and performance of the current transportation system, which is sorely needed before agreeing to perpetuate them at a cost of half a trillion dollars. Instead, unbiased planning would begin by assessing the cost performance and reinvestment burden of existing systems compared to alternatives, including competitive substitutes and system retirement or curtailment.

[12] Draft Plan Bay Area 2050+ (Full Document); Transportation Element section under the "Maintain and Optimize the Existing System" theme; page 72.

16) Question: Will the MTC evaluate an alternative which distributes jobs and residents AWAY from crowded urban cores to smaller cities, and which mitigates transportation burdens by lowering peak transportation loads on a centralized transportation network?

D. Underestimated Risks and Excessive Costs

1. Underestimated and Inconsistent Transit Project Costs

The Plan, in the paper Draft Transit 2050+ Report [*Attachment D: "Detailed Table of Lifecycle Costs"]* presents project costs and lifecycle costs in billions of 2019 dollars., while other papers [*e.g. DRAFT TRANSPORTATION PROJECT LIST REPORT page 16, et al*] use YOE (Year of Expense) costs.

DEIR Section 2 Project Description cites $500B for transit project costs, but expresses it in 2019 dollars, which are 55% higher in 2025 given the Calif. Construction Cost Index.

Thus, the Plan transit costs should be $275 Billion higher in 2025 dollars, for a total of $775 Billion. Expressed in YOE dollars, those totals should be even higher.

17) Question: Will the Plan conform its cost estimates to YOE numbers and avoid understating Plan costs?

2. Lack of Consideration of the Comparative Costs of Transit Alternatives

Major Bay Area Transit systems operations cost over 6x per passenger mile compared to an EV[13]. Bay Area Transit systems tie up 16 time more funds per passenger mile than an EV[14]; they are extremely asset-inefficient outside of dense metropolises such as NYC and Tokyo. Nationally, even using depreciation expense at original asset values (which are far less than current replacement costs) rail systems cost $3.18 per passenger mile; Bus, vans, paratransit cost $0.75ppm, and private auto is under $0.38 ppm[15]. An AV ride-share or vanpool would be even cheaper than an EV because the vehicle usage and the number of riders per trip would increase.

[13] Spreadsheet analysis of 2024 ACFR's for 8 major Bay Area Transit Operations, in Attachment 2. https://shiftbayarea.substack.com/p/the-true-cost-of-transit

[14] Ibid

[15] AI summary to be cited

The Plan claims ambitious improvements if its transit spending is implemented, for example:

By 2050, the combined housing and transportation cost burden for all Bay Area households could decrease by 25%, while for low-income households, this cost-burden reduction could reach 50%. The share of households near frequent transit across the Bay Area could increase by 45% under plan strategies, and the number of jobs accessible via transit, biking or walking is projected to increase by 40%.

There are two questions that this analysis does NOT address: First, at what cost will these services be provided, and compared to what other transportation alternatives? And second, is that level of service good enough for the money? Access to transit still requires you to GET TO and FROM transit, at times carrying your groceries home in the rain. A ride-shared EV AV or van could attain costs per passenger mile of $0.30 to $0.50[16], compared to the major Bay Area transit agencies' $3.40 per mile, while providing door to door convenience and time savings. The savings in travel time and improvement in convenience of vanpool on request services could be a major improvement over the expensive, traditional alternatives the plan proposes to fund, yet is not analyzed.

[16] The California Vanpool Authority costs $0.13 per passenger mile per this report: https://californiapolicycenter.org/reports/the-cost-of-transit-in-california/

18) Question: Will the MTC revise the Plan to include service metrics for the full origin to destination time and cost of transportation, so that the increased convenience of vanpool, ride-hail, and AV alternatives are properly compared to traditional transit services?

3. Consider Avoidance of Capital Cost Risks

Traditional transit alternatives involve large up-front capital costs in inflexible infrastructure in the hopes that high utilization will reduce per passenger mile costs and pollution. History has shown that these hopes have not been realized and that these costs are much higher than passenger vehicles. Continued investment in large infrastructure should be stopped and investments instead made in smaller buses and vans which can be demand-adjusted in routes and locations based on customer needs. Such has been the approach in Seoul, South Korea, where express bus lanes replace fixed rails systems.[17] Further, more agile road-based transit can be scaled up or down, unlike fixed rail systems.

[17] https://www.seamlessbayarea.org/blog/2025/5/5/notes-from-korea-how-bus-reforms-and-fare-integration-transformed-seouls-transit-bs2yk

4. Massive Costs Per Bay Area Resident

The plan identifies almost $1.5 trillion in "investments" but only about $600 billion in existing revenues, leaving a massive gap which would require huge new taxes. Just the UNFUNDED portion of this plan would require $100k per person in the Bay Area over the next 25 years ($4k/yr/person) and with more accurate population and cost figures (*see point 1 above about the error in transit costs*), that number is an UNDER-estimate of the per resident cost burden.[18]

[18] Attachment 3 shows the calculation of this cost using MTC's assumptions.

5. Out of Context Giveaway

The Plan proposes giving away $200B in Universal Basic Income (UBI) rather than funding the many local government infrastructure investment needs required. The tradeoff between social justice and economic contribution is too large a topic for this comment letter, but until the Plan has fully quantified the level of infrastructure and operating deficits in the region's local governments and agencies, consideration of this expense is at best premature.

19) Question: Will the MTC upgrade the Plan to define project investment contingency gateways based on full lifecycle funding availability, so that – as happened with Calif. High Speed Rail – the Plan does not foster waste by creation of uneconomic, stranded assets?

6. Prioritizes the Wrong Climate Risk

Sea Level rise is given much emphasis in strategy EN-1. The Plan proposes spending $96 Billion on sea level rise adaptation, but stormwater is unfunded and treated as a regional compliance issue. In fact, storm-related flooding is already a clear and present danger, and the science and policy to cope with it are both inadequate.

Green stormwater infrastructure does not address the reality of current climate risks, the science is flawed, and there is no commitment to a full-fledged regional flood-control program for inland flooding, which is an immediate need. We fully agree the DEIR statement in Mitigation Measure PUF-1(b) page 3.14-40 which states "*Model and implement a stormwater management plan or site design that prevents the post development peak discharge rate and quantity from exceeding pre-development rates*." However, we suspect that the MTC and most cities, counties and agencies do not realize that even the newest NOAA atlas of rainfall data is over 10 years out of date (2014) and that the National Academies of Science has admitted that current methods for estimating peak precipitation do not work – and it needs 10 to 15 years to fully research and solve this problem.[19]

[19] most concerning recent scientific finding is contained in the National Academies of Science 2024 document: Modernizing Probable Maximum Precipitation Estimation.

Since the most recent 10 years of Climate Change have seen the greatest temperature and CO2 increases in history, using only existing stormwater design standards exposes all residents to significant flooding risk and - with the creation of more impermeable surfaces - that risk is further increased. Further so-called development needs to be prevented unless it can defend against the highest peak rainfall in history, because it is only going to increase, and policies need to be designed to fund the required stormwater infrastructure which is currently unable to handle flooding in recent atmospheric rivers in many Bay Area locations, such as San Mateo County. These policy enhancements must occur BEFORE additional impermeable surfaces are created. For further details on the science and policy implications of the stormwater problem, see Chapter III and IV of Flooded With Problems - Stormwater Management on the SMC Coast; Midcoast Community Council, Mar. 11, 2025.

Further, the Plan explicitly envisions investing in resisting sea level rise (protection and adaptation) rather than promoting large-scale managed retreat as a central planning strategy. This will be futile (e.g. King Canute who could not hold back the tides) and wasteful. This proposed policy creates the failure of the Samaritan's Dilemma, perpetuating a moral hazard at the expense of the region's residents, rather than motivating behavior to avoid those risks.

20) Question: Will the Plan expand and reprioritize its climate-related investments to include development of improved stormwater policies and funding?

7. Ignores Wildfire Risks and Costs

Wildfire risk is not directly modeled. The growth forecasts implicitly assume that:

1. Fire risk will not materially constrain development in designated growth areas.

2. Existing communities in high-risk zones will persist, even as risk increases.

Further there are no performance targets for wildfire exposure reduction and no assessment of the cost burdens – both in insurance and fire-fighting – involved in wildfire over the Plan period.

No wildfire-related metrics are forecasted and compared on:

1.Acres treated

2.Homes hardened

3.Evacuation capacity

4.Fire-related displacement

5.No regional mitigation commitments are made.

6.No wildfire mitigation projects are funded

7.No fuel-reduction programs

8.No investments in firefighting infrastructure

9.No evacuation route upgrades explicitly tied to wildfire

10.No funding for home hardening or retrofits

The Plan does not address:

1.Rising insurance costs in fire-prone areas

2.Fire-related housing displacement

3.Post-fire rebuilding affordability

4.Equity impacts on lower-income or rural communities in the WUI

21) Question: Will the Plan expand and reprioritize its climate-related investments to include development of improved wildfire mitigation policies and funding?

E. Critical Issues in Process and Governance

1. Take The Plan Seriously

Because forecasts such as the Plan are often treated as vision documents, they escape the kind of forensic audit applied to financial data. However, our current regional environmental and fiscal stresses mean that we cannot treat the Plan as an irrelevant 'wish list' or justification for attracting easy Federal and State funding. Under the current Federal and State situation, that funding is unreliable. Yet the need for a thorough assessment of regional needs is vital. Thus, we require a level of rigor heretofore lacking in prior Plan Bay Areas.

22) Question: Will the MTC undertake the expanded planning mission required to address the many vital questions in this DEIR response?

2. Plan Lacks transparency

The MTC failed to hold CEQA plan comment sessions in Contra Costa, Napa, Solano, Sonoma, San Mateo and Santa Clara Counties. [Did hold sessions in SF, Alameda, and Marin]

23) Question: Will the MTC issue an improved Draft Plan and DEIR and allow all counties affected to participate in local hearings?

Our request for details on the cost calculations was denied, and important details allowing Plan validation will only be released with the full EIR – so we, and all reviewers, are unable to assess the validity of the DEIR. (see my email from PBA staff.)[20]

[20] GAD email 11/15/25 3:49PM:

Dear PBA,

This document:

https://planbayarea.org/sites/default/files/documents/Notice_of_Preparation_Plan_Bay_Area_2050%2B_Draft_Environmental_Impact_Report.pdf

Contains numbers in a table on page A-4 for which I cannot find supporting details.

Footnotes 1 and 2, for example, do not refer to sources.

Please provide the assumptions upon which these numbers are based and/or refer me to an existing document that does so.

---------- Reply from eircomments@bayareametro.gov ----------

Thank you for your inquiry. We will provide a full response as part of the Final EIR. In the meantime, the supporting data is referenced in the Draft Technical Assumptions Report available at the following link: https://planbayarea.org/sites/default/files/documents/Draft_Technical_Assumptions_Report_0.pdf?cb=88105e79.

24) Question: Will the MTC allow an independent, expert audit of the modeling efforts to confirm validity of the approach and results?

25) Question: Will the MTC hold open the comment period on the Draft Plan and DEIR until the details of modeling and financial projections are released for public review?

3. Plan Disenfranchises and Defunds Local Governments

The Plan directs money from county taxes to regional priorities, sapping resources the counties might better direct to address their priorities (e.g. wildfire and stormwater in SMC). Unelected regional bodies without independent oversight are thus overriding the priorities of our locally elected governments. Without meaningful oversight, MTC's planning uses flawed modeling that "reverse-engineers" outcomes to justify predetermined policies that override local concerns.

26) Question: Will the MTC consider a revised Plan that first measures and ensures the fiscal sustainability of local governance, and only then proposes additional investments and funding?

4. Lack of Accountability and Oversight

Several elected officials in San Mateo County have voiced concern about the lack of Oversight of Bay Area Transit Agencies. For example, the IG of BART resigned because she wasn't allowed to do her job. And most transit agencies do not even have IG's. Currently most of 'oversight' is non-professionals reviewing expenditures 6 to 18 months after they occurred, with no authority to question them in advance of expenditure. What is needed, as an essential companion to funding any parts of a Plan, is creation of Oversight that is empowered and proactive, fully funded independently from agency management, and reporting directly to the Boards. These concerns have been previously communicated to the MTC and are attached as guidance for the design of an effective Oversight Office.[21]

[21] 2024-07-24_BAHFA Bond Oversight Committee 07 12 24. Attachment 4

The Plan defines no trigger criteria by which to measure the cost/benefit success or failure of the investments desired. There is no audit mechanism to track the monies and programs. There are no contingency paths defined to change approach when projects fail to produce results. There is no provision for restitution of monies wasted if projects fail to produce promised benefits. All the risks are with the taxpayers and residents; none are with the Planners. These are fundamental changes that must occur now, before we entrust $1.5 Trillion to anyone.

27) Question: Will the MTC recommend an independent, pro-active Oversight Office to address the above concerns?

5. Unproven Modeling Approach

Or more accurately, proven wrong. Beginning with the prior Plan Bay Areas, population and transit ridership forecasts have been materially in error on the high side. There is no evidence the models used in this process have been validated or are correct. The model used in the Plan, REMI, treats population migration as a function of economic opportunity, not from housing affordability stress or quality-of-life exit dynamics in a high-cost region.

Regarding the models used, per the Plan: "*These processes provide technical transparency that allows peer evaluation by regional stakeholders, planners, and consultants*." Yet when we requested access to the model details, we were told to wait for the final EIR. The core Plan Bay Area 2050+ Draft Forecasting and Modeling Report does not itself publish detailed calibration statistics or procedures. Likewise, the Draft Plan Bay Area 2050+ Technical Assumptions Report and Transit 2050+ Report do not include calibration tables themselves but rather present the assumptions that feed into models.

Plan Bay Area 2050 technical methodology documents explicitly note that Travel Model 1.5 was calibrated and validated to year-2015 observed travel data using actual trip counts, travel surveys, and other observed measures; a peer review of that travel demand model was conducted and discussed with "regional partners" prior to its use. There is no apparent evidence that updated calibration, reflecting the major transportation changes from the Pandemic, was used in this analysis. A peer review by unaffiliated experts is now required. And by "unaffiliated" we mean: not MTC or ABAG staff, and by no consultant previously retained to do work for MTC/ABAG or the 8 major Bay Area Transit agencies.

28) Question: Will the MTC allow time for peer review of its technical methodology and results by unaffiliated experts, before finalizing the Plan and EIR?

F. Recommendations and Conclusions

In sum, this Plan is inadequate to the needs of the Region. The DEIR itself acknowledges in Mitigation Measure PUF-1(f) that 35 issues have Significant and Unavoidable (SU) environmental effects, including construction of new or expanded water, wastewater, stormwater, power, natural gas, or telecommunications facilities. Yet the Plan does not prioritize or fund the very infrastructure required to address these essential services. Instead, from the perspective of many local jurisdictions, it prioritizes lower-priority projects, particularly in the transit and housing domains, while leaving unfunded the mitigation of climate, social, and infrastructure risks that bear directly on regional survival and affordability. Also, as detailed above, the Plan fails in other areas of its scope and execution to assess reasonable alternatives and even the current fiscal condition of the region, upon which any viable plans must rest.

A critical suggestion about issues that a regional plan should address is found in the Plan's Economic Vibrancy section:

"The overwhelming majority of public comments related to economic vibrancy focused on the negative impacts of inflation and the high cost of living in the Bay Area. Residents also commented on low or stagnant wages, the job market and income inequality"

A truly comprehensive plan for the Bay Area would establish key success factors for those issues as well as overall fiscal sustainability of the region, would define the linkages between investment and policy decisions, would define how to audit the accomplishment (or lack thereof) toward improvements, and would provide accountability for those making bad decisions or failing to properly execute projects – including terminating their charters. A truly comprehensive regional plan would establish measurable social benefit targets for: cost of living, wealth and income inequality, median household income, unemployment metrics, educational outcomes, and public health.

For regional institutions, the factors a Plan should consider include: fiscal sustainability, unit cost performance, return on assets, operating margin, and the Plan would include monitoring project performance to both project budget and economic payoff over time with transparent reporting and consequences for failure. Note that major transit projects in the Bay Area are notorious for being massively over budget and for failing to achieve ridership and financial payoff, yet restitution to taxpayers and sanctions for the offending agencies have both been absent.

The Plan begins by continuing the history of prior such Plans, with unrealistic forecasts, and compounds that flaw by failing to consider a variety of alternative strategies to reimagine the region's future with emerging, modern transportation and telecommunications technologies. Instead, the Plan should begin at the beginning, by assessing the climate and fiscal stresses in the region, by asking local governments for their priorities, and by incorporating a range of alternatives and sensitivity-testing into its plan scenarios.

The Plan focuses overly on Transit and Housing, while assuming all the other aspects of our regional infrastructure will largely take care of themselves. It proposes continuing funding favored legacy infrastructure without evaluating competing strategies utilizing emerging modern alternatives such as tele-commuting and autonomous vehicles. And it proposes new funding for its favored partners (transit and real estate interests), while NOT proposing funding for cities, counties, schools and public works institutions which are all under severe fiscal stress. At the same time, it ignores real, expanding threats from climate change such as stormwater flooding, wildfire, and drought. Finally, the Plan lacks necessary financial analyses upon which any viable plan must rest:

A. Assessment of the fiscal condition and needs of the region's cities, counties, health care institutions, schools and public works institutions, and,

B. Comparison of the cost-of-living impact on existing residents from the current situation, the emerging climatic future, and any allowed, sustainable population expansion.

This Plan and the related DEIR must be firmly rejected, and redone, to address the points made herein, as well as to address comments from others in the region.

G. Requested Actions

The following requested actions are drawn from and consistent with the analysis above:

1. Revise demographic and economic forecasts

Revise the Plan's population and employment forecasts to align with California Department of Finance projections and recent migration, fertility, and affordability trends, and sensitivity-test flat and negative growth scenarios across all alternatives

2. Conduct a comprehensive regional fiscal and infrastructure baseline

Before finalizing investment priorities, prepare and publish a comprehensive audit of the fiscal condition and capital needs of the region's cities, counties, schools, health systems, water and wastewater agencies, stormwater utilities, and power providers, including identification of structural deficits, unfunded liabilities, and asset replenishment requirements.

3. Develop and fund regional water and stormwater resilience programs

Establish a funded regional program for water supply and stormwater resilience that:

- Incorporates updated climate science and modernized probable maximum precipitation estimation methods;
- Explicitly analyzes affordability impacts on existing residents; and
- Conditions approval of new growth and impermeable surfaces upon demonstrated capacity to manage future flood and drought risks.

4. Integrate wildfire risk reduction into the core Plan

Incorporate wildfire risk explicitly into land-use and transportation planning by:

- Setting regional targets for acres treated, homes hardened, evacuation capacity, and displacement risk reduction;
- Funding wildfire mitigation projects and evacuation route upgrades; and

- Assessing insurance, rebuilding, and equity impacts on WUI communities.

5. Evaluate and incorporate emerging mobility and telecommunications alternatives

Direct staff to evaluate autonomous vehicles, ride-hail, vanpools, demand-responsive shuttles, express bus networks, and broadband expansion as core strategies, with full lifecycle cost and performance comparisons to existing transit systems, and incorporate cost-effective alternatives as funded elements of the Plan.

6. Standardize and fully disclose cost metrics and project financials

Require that all major projects report both constant-dollar and year-of-expenditure costs using consistent assumptions, and publish detailed lifecycle financials—including capital investments, revenues, operations, maintenance, and asset replenishment - for at least the first asset life cycle of each project.

7. Strengthen oversight and accountability for regional investments

Create an independent, well-funded oversight office with authority to review and approve major expenditures in advance, to audit performance against cost and benefit expectations, and to recommend management or project changes and/or cancellations when results fall short, with public reporting on outcomes.

8. Rebalance the Plan's scope to include core civic services

Expand the Plan's scope to evaluate needs and propose funding and policies for schools, health care, water, wastewater, stormwater, power, and telecommunications, proportionate to their essentiality for residents, rather than concentrating new funding primarily on transit and housing.

9. Improve transparency, outreach, and technical documentation

Hold formal DEIR and Plan comment sessions in all nine Bay Area counties; release key technical assumptions, model documentation, and calibration statistics during the draft period; and subject core model analyses (including REMI and Travel Model 1.5) to independent peer review by unaffiliated experts.

29) Question: Which, if any, of the above recommendations will the MTC adopt in creating an improved, and essential, Plan Bay Area?

H. Author's Background

Born and raised in the Bay Area, Mr. Dieguez until recently served as elected Chair and member of the Midcoast Community Council in San Mateo County. He has been heavily involved in the infrastructure of the Coastside since 2012, including: water, sewer, stormwater, telecommunications, wildfire and schools, and has authored over 100 articles on local issues in the past decade. He has consulted on financial and infrastructure matters with Elected Officials in the adjacent cities of Half Moon Bay and Pacifica. In 2003, he co-founded the MIT Club of Northern California's award-winning Energy & Environment program, which became the largest alumni program in the nation. In his career he used, developed, and trained others in computer simulation technologies for financial modeling, work flow modeling, and System Dynamics modeling. He has submitted proposals on infrastructure accounting to the GASB in order to quantify fiscal sustainability, and been invited to testify and comment further.

Response I30-1

Please refer to Responses I29-1 through I29-95.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I31 Dan Haggerty

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I31-1

Hello,

I have read and agree with the draft EIR comments from Mayor Liang Chao of the City of Cupertino, CA.

Thank you,

Response I31-1

Please refer to Responses A23-1 through Responses A23-15 for the City of Cupertino letter incorporated by reference.

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter I32 Francisco Pereira

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I32-1

What is project 2050+ plus what are their plans, and how effective will it be? Is it truly the saving grace which they like to mention?

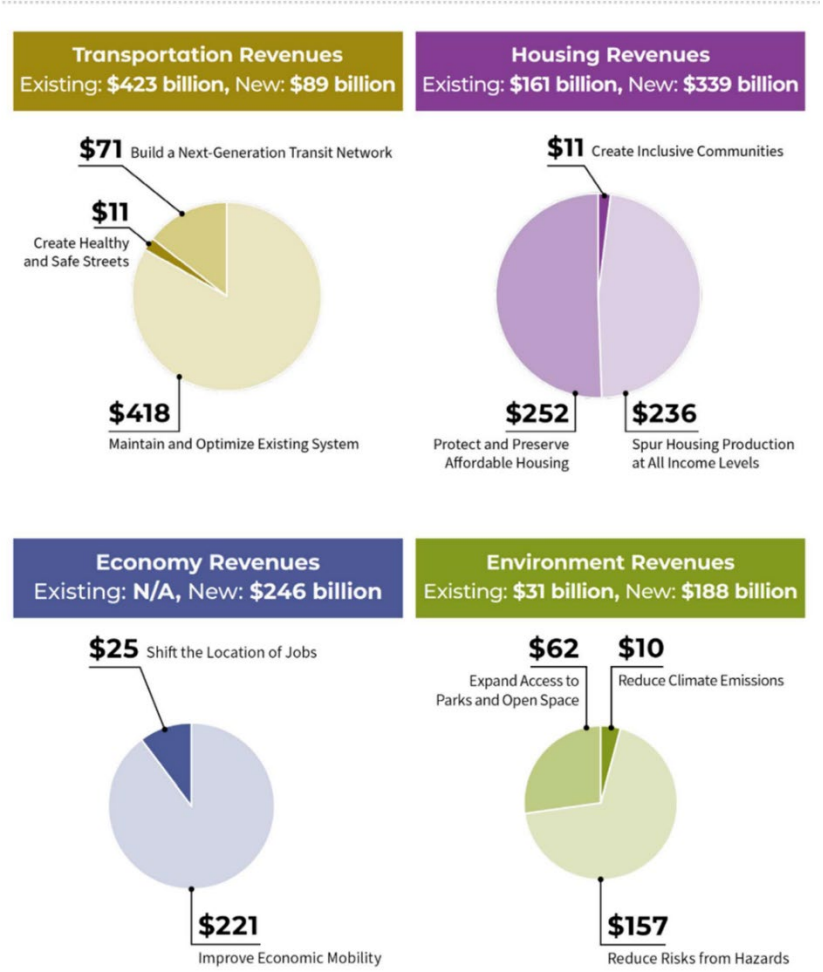
Response I32-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Chapter 2, "Project Description," of the Draft EIR for a discussion of the proposed plan.

Comment I32-2

The New 2050+ Plan

The 2050+ Plan is the idea that by 2050, we will have all these great advancements in the Bay Area in of form of transportation, housing, the environment, and so forth. However, before we talk about these changes, let's first look at how much it will cost.



Response I32-2

Plan Bay Area 2050+ includes high-level estimates of regional-scale investment needs across plan elements for planning and analytical purposes. The proposed plan is a long-range regional policy framework and is not a financial programming document. The plan does not itself allocate funding to specific projects outside the federally required transportation planning context, nor does it impose taxes or require adoption of new funding measures.

The proposed plan identifies both existing and potential future revenue sources. Implementation of plan strategies would occur over time through future actions by multiple agencies and governing bodies. Many potential future funding sources would require separate legislative action and/or voter approval and are not guaranteed.

The Draft EIR evaluates potential environmental impacts associated with the proposed plan at a programmatic level and does not constitute a financial audit or funding commitment document. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" for additional discussion of plan funding assumptions, fiscal uncertainty, and implementation considerations.

Comment I32-3

It's not complicated, the politicians just makes this quite confusing. The first part you may see is revenues. These are the revenues the San Francisco Bay Area will need to cover all the costs. Of course, the

government doesn't really have revenue, since we are its revenue so just know that revenues are what we will be paying as the taxpayer.

Response I32-3

The commenter raises concerns regarding plan cost and the relationship between plan revenue estimates and taxpayer funding. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I32-2 and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" for discussion of planning-level revenue assumptions, implementation uncertainty, and the distinction between projected revenue categories and actual funding actions.

Comment I32-4

Next, we see the labels existing and new. Existing stands for the current amount we spend and new for the future amounts that will need to be added to complete project 2050+. By adding them all together, we get a total cost of $1.477 trillion which will be paid over 25 years. Quite a substantial amount for our little home, but how much is this really?

Response I32-4

The commenter provides calculations intended to translate regional planning-level investment estimates into an estimated annual cost burden per household. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I32-2 and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources."

As noted in those responses, Plan Bay Area 2050+ does not impose taxes, approve ballot measures, or assign the full investment needs of the plan to Bay Area households. Regional investment totals reflect planning-level estimates that would be implemented over time through multiple funding sources and mechanisms, including federal, state, regional, and local revenues, and other future discretionary actions, as applicable. Accordingly, dividing total regional investment needs by household counts does not reflect how funding would actually be distributed, programmed, or financed.

Comment I32-5

Steps:

1. There are about 2,800,000 households in the Bay Area. So if we divide this total cost by the number of households, we get $527,500 per household.

2. Let's make some commonsense adjustments. About 25% of households are in the lowincome category, so we can assume that they will not provide very much in taxes. To account for this, let's reduce the number of paying households by 20%, and recalculate: $659,375.

3. Another adjustment that seems quite reasonable is that the government will not have accounted for certain expenses or will need for more taxes. Let's add a 75% increase to the cost: $1,153,906 per household.

4. Finally, since this plan is over twenty-five years, let's divide by 25: $45,156.

This $46,156 is the amount you can expect to pay in taxes per year. What, did you expect, reasonable? Now this will not just be in local taxes, but broken across state taxes, subsidies, federal taxes, and other hidden expenses. We might be able to fleece a bit of money from other states to pay for it, but I would like to know how much it would cost us alone as a good benchmark. Before you go crazy, let's give the government a fair and honest look over, maybe they know something we don't.

Response I32-5

The commenter raises concerns regarding transportation costs, transit operating shortfalls, and the role of future transportation revenue measures. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I32-2 and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" for discussion of plan funding assumptions and uncertainty.

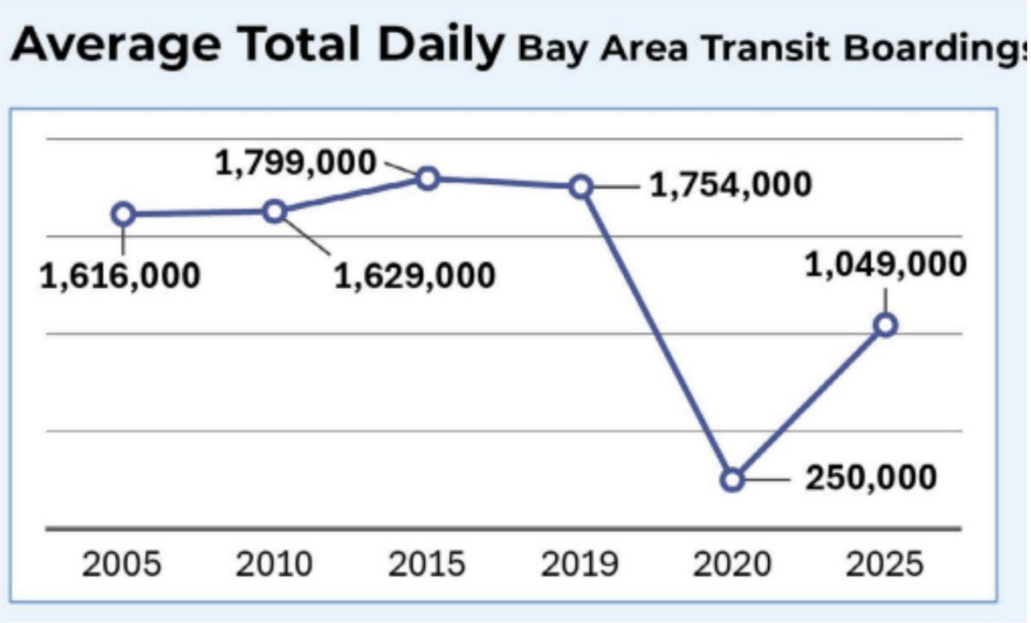
Plan Bay Area 2050+ transportation investments are required by federal law to be fiscally constrained, meaning that the transportation element must demonstrate that transportation system costs are balanced against reasonably anticipated revenues over the plan horizon. Transportation funding needs include not only capital expansion projects, but also ongoing operations, maintenance, rehabilitation, and modernization of existing infrastructure and services. As noted in Plan Bay Area 2050+ supporting materials, transit agencies continue to face operating funding challenges, and additional operating support may be required to maintain and improve service levels.

The Draft EIR evaluates environmental impacts associated with the proposed plan at a programmatic level and does not serve as a financial audit or determination regarding the appropriateness of any particular revenue measure.

Comment I32-6

Transportation to Salvation?

Transportation will be the largest cost, with a total of $512 billion. First, let's look at the transit rates:



As we can see, transportation has gone downwards since 2019, yet costs have not. With the signing of the Senate Bill 63 by Gavin Newsom this October, the Bay Area is calling for a 14-year $980 million annual transportation sales tax. This tax covers the annual deficits of our transportation system which amount to $800 million. How this is not covered by the already gigantic $423 billion we currently spend, your guess is as good as mine.

If you are wondering why our government will never say they are overspending, it is because if they ever admit they are overspending in one place, people may start asking questions about where else they are overspending, and auditing by the taxpayer is a big NO.

Don't worry, we are also throwing on another $71 billion Next-Generation Transit Network. Considering the cost of the high-speed rail from San Francisco to Los Angeles jumped from $33 billion to $128, this one might get very expensive.

Response I32-6

Please refer to Response I14-1 regarding economic impact consideration in CEQA. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I32-7

Sea Level Rising!

So, the expenditure in transportation does not look great, how about the sea levels. Surely, we have to protect against that. Now, these people (our politicians) love to preach to us about their dogma of climate change, and that rapidly rising sea levels will lead to disastrous consequences unless large scale planning is in place.

Response I32-7

Plan Bay Area 2050+ uses the latest sea level rise science from the California Ocean Protection Council (OPC) Sea Level Rise Guidance Document (OPC 2024), which is aligned with the latest science from the Intergovernmental Panel on Climate Change (IPCC). The 2024 OPC Guidance High Scenario predicts sea level rise of 0.5 feet by 2035 and 1.1 feet by 2050. Due to data availability, the closest dataset height available from USGS was 1.6 feet, which is rounded in the plan to 2 feet. For additional information regarding the resilience project list and assumptions, please see the Plan Bay Area 2050+ Resilience Project List Report.

Comment I32-8

Climate change has resulted in rising sea levels in the Bay Area. This ongoing trend could cause disastrous damage to buildings, infrastructure and habitats across the region. Plan Bay Area 2050 planned for two feet of permanent inundation by 2050.

Plan Bay Area 2050+ also assumes 2 feet of permanent sea level rise by 2050 and includes an adaptation strategy that protects against annual king tide events and major storms up to 4.9 feet.

Well, is it really going to be that scary? Not quite, for the sea level is rising close to 1 inch per decade, which is about the thickness of a nickel each year. If you think that is catastrophic, then I don't know what to tell you. Sea levels have **risen linearly for over a century**, with no detectable acceleration from man-made CO_2 in sight. At current trends, it would take **well over 250 years** to reach that dreaded **2 feet**.

Response I32-8

The proposed plan includes strategies to mitigate sea level rise in the Bay Area. Impacts from sea level rise are evaluated throughout the Draft EIR through analysis of sea level rise adaptation projects. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I32-9

I could discuss all the problems with man-made climate change however, that would be a bit too long for this article. If you would like to know more, here are the first two articles of a four-part series I am working on it.

Part 1: Global Warming: Man or Nature? (Click Here)

Part 2: Global Warming: Common Myths (Click Here)

Response I32-9

Plan Bay Area 2050+ includes regional climate resilience strategies intended to reduce long-term exposure to flooding, sea level rise, and storm surge, including protection of critical infrastructure and vulnerable communities. Cost estimates included in the proposed plan are planning-level estimates and do not represent an adopted expenditure program, do not allocate costs to individuals, and do not impose taxes. Please refer to Response I32-2 and "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," which discuss planning-level investment estimates and implementation uncertainty, and why dividing regional costs by population does not reflect actual funding responsibility or allocation.

Comment I32-10

Why does number matter so much? Well, that magical two feet is going to cost us $96 billion or on a per person basis, $12,800 each.

Response I32-10

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I32-2 and Response I32-6. Comment I32-11
Affordable Housing

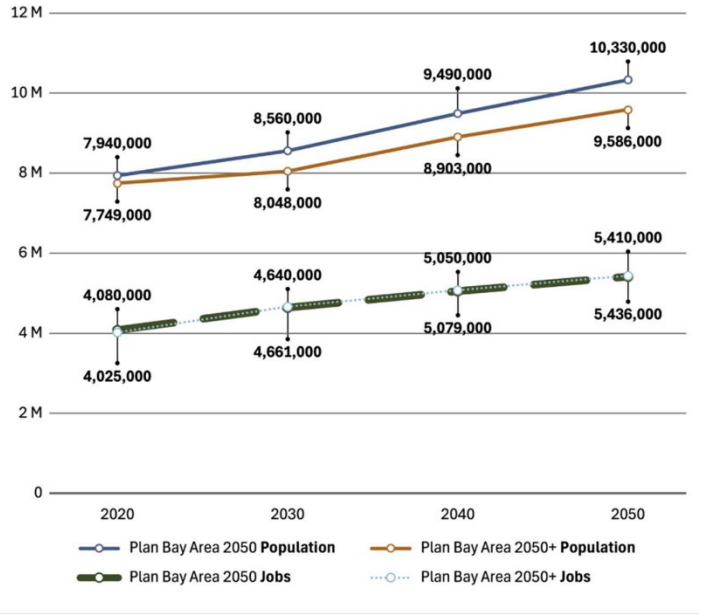
We need affordable housing; we need affordable housing! That is the mantra which is preached to us. We have so much inequality that it must be fixed. The only way is to spend $100's of billions to build low-income houses, and currently we are not building enough. We need 55,147 housing units a year and are only building 25,735. So, the government is going to what it does best, and force us to build more.

If this overcrowding is not what we desire we can still stop it will zoning restrictions, right? Not quite, with the passage of Senate Bill 450 in November 2024, we are no longer able to stop them with zoning restrictions from flooding our home with all these low-income houses.

Response I32-11

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Plan Bay Area 2050+ is based on regionally adopted forecasts of population, household, and job growth that are used for analytical purposes to evaluate how the region could accommodate projected growth and to compare environmental outcomes of different land use and transportation strategies. The proposed plan does not rezone land or mandate specific development projects, building heights, or redevelopment of particular sites. Local jurisdictions retain land use authority, and any redevelopment proposals would be subject to local planning processes and applicable environmental review at the project level, as appropriate. Please refer to "Master Response 1: Regional Growth Forecast" and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation".

Comment I32-12



Now you may ask but isn't that ok because at least these people would have homes. There is another part which they are not promoting, they intend to increase the population by 1.7 million, about a 25% growth (7.7 → 9.5) by 2050. They are planning on changing our malls into giant apartments, erecting 15-17 story buildings, and flooding our towns multifamily homes. You thought the Bay area was overcrowded now, oh just you wait, if we allow things to stay as they are, it will get much worse.

Response I32-12

Plan Bay Area 2050+ uses adopted regional forecasts of population, households, and jobs for planning and analytical purposes, but does not mandate that any specific community accept development beyond what is determined through local planning and state law. The proposed plan does not override local land use authority or approve specific development projects. The Draft EIR evaluates environmental impacts associated with the proposed plan and alternatives at a programmatic level. The comment regarding growth preferences and community character is noted, and the MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan and Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast" and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation".

Comment I32-13

You cannot fix a home scarcity problem by importing more people! The people who will be hurt most by this are those who the government is claiming to defend. When do we get a say in this? What if I don't want mass migration into my little town. What if I don't want a booming urban center, but the simple neighborhood I grew up in. I see the way my hometown is going, and I don't like it. rises and you know I don't think that is unreasonable.

Response I32-13

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I32-12 regarding local use control. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I32-14

So, what's my answer to all this aordable housing nonsense? None. I want a net-neutral or netnegative influx of people, and that doesn't seem very unreasonable. This county is not poor house of California. Let's speak truthfully, these people are not going to be loyal, good, taxpaying citizens, but with them is going to come crime, and more mouths for us to feed. Do you think low-income people are going to want more or less taxes? More, much more, and not paid by them, but by us. And the more we import, the less control we will have over home and our future. If we don't do something now, we won't be able do anything later.

Response I32-14

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I32-15

Let's talk about who this housing is truly affordable for. It's affordable to the politician who will import more votes leading to more taxes, it is affordable for the migrant who gets a cheap house, it's affordable to the construction contractor who can gain up 50% of the housing costs in subsidies, but it certainly won't be affordable for the regular taxpayer who has to fund all this.

Response I32-15

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I32-16

Is this really the best you can do politicians? With the amount of money we give you, is this what you could come up with? Guess how many people they asked when coming up with this doomsday plan? 17,000. That is 0.2% of Marin, and somehow these bureaucrats are going to act like this was a combined effort. This plan is one gigantic fleece job, and I for am done with the government taking me for the fool and will no longer be going to sit around idlily allowing my home to be destroyed. Will you?

Response I32-16

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I32-17

Who are the Players

Let's start with the two main organizations driving this change: the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG). If you ever step into the domain of politics in this region, these two are the heads of the snake.

They manage the area's "long-range transportation, housing and land-use plan, which guides the agencies' policy and investment decisions". But, who are the leaders, who are guiding organizations? I like seeing the names and faces of those destroying our towns.

Executive Director: Andrew B. Fremier

Andrew Fremier is the executive director of both the (MTC) and the (AGAB). Shocking, talk about collusion in our government. He oversees a staff 400 strong who manage the entirety of the San Francisco Bay Area including the council of governments for the region's nine counties and 101 cities and towns.

Nor is that all he lords over. For Fremier leads Bay Area Toll Authority (BATA), Bay Area Housing Finance Authority (BAHFA), the Bay Area Infrastructure Authority (BAIFA), the MTC-SAFE, and the Bay Area Headquarters Authority (BAHA). His tenacles thick through our government.

And now for his number two.

Alix Bockelman, Chief Deputy Executive Director

In 2023, Alix Bockelman was appointed to the new position of Chief Deputy Executive Director for MTC and the Association of Bay Area Governments. In 2003, she was the principal analyst to oversee the region's $18 billion transit expansion program. Certainly, no stranger to vast sums indeed.

This is a mere introduction, and I have no doubt more will need to discover on this two. Nor do they act alone for there are many more in this gang of vagabonds: click here. However, I have no doubt that these are just the mere front man. Greater minds lurk further in the shadows avoiding detection. They will not be able to hide forever, however. Their time is coming to end, for they cannot run from the light of truth!

Response I32-17

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I33 Anne Gray

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I33-1

The purpose of this email is to provide a general comment, by way of a specific example, that to me indicates there are many significant flaws in the Draft EIR. I realize that is why it is a "Draft" but there is a very long way to go for it to pass the common sense test. I will focus on Section 3.14.3, as an example. It reads:

****

3.14.3 Impact Analysis SIGNIFICANCE CRITERIA. The following significance criteria are based on CEQA Guidelines Appendix G, thresholds used in the EIR for the Plan Bay Area 2050, and professional judgment. Under these criteria, implementation of the proposed plan would have a potentially significant adverse impact if it would:

require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects (Criterion PUF-1);

have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years (Criterion PUF-2); result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments (Criterion PUF-3); or

generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and comply with federal, State, and local management and reduction statutes and regulations related to solid waste (Criterion PUF-4).

****

This whole section is fraught with significant problems that cannot be downplayed. Continued climate change makes our future water needs impossible to predict with any certainty. Storm water drainage is already stressed by excessive rain and atmospheric rivers. Rain years can be good or very bad.

Response I33-1

The comment provides a summary of the significance criteria in Section 3.14.3.

The comment does not identify specific deficiencies in the adequacy, accuracy, or completeness of the Draft EIR's public utilities and facilities analysis under CEQA. Further, CEQA does not require certainty in forecasting future climate conditions, but rather a reasonable, good-faith evaluation based on the best available information at the time of preparation. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I33-2

In particular, PUF-2 assumes that the project *will "...have adequate water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years."*

Assuming adequate water supplies is a big assumption. A very big assumption. If it turns out supply doesn't meet demand what will you do? Competition for water - throughout California - is gaining

momentum. Divvying it up won't get easier. How can you guarantee adequate water supply should be the real question that needs an answer.

Response I33-2

The analysis in the Draft EIR does not assume adequate water supplies as stated in the comment, which is taken from State CEQA Guidelines Appendix G question b for utilities. Impact PUF-2 on page 3.14-44 of the Draft EIR concludes:

> *The land use growth footprint that would result from implementation of the proposed plan would generate most of the water demand resulting from accommodation of the regional growth forecast. While the permanent demand on potable water supplies required by sea level rise adaptation projects and transportation projects would be relatively small compared to the total demand associated with construction and operation of land use projects, the collective demand could result in water demand that exceeds an applicable water agency's projected demand and supply. Additionally, the construction phase of a sea level rise adaptation project or transportation project (water for mixing concrete, watering down topsoil, initial irrigation needs) could exceed local water supplies on a temporary basis, especially during dry years or prolonged drought periods. It is also possible that a transportation project that features significant landscaping that is not drought-resistant could significantly impact local water supplies over a longer term. Because the construction and operation of land use, sea level rise adaptation projects, and transportation projects under the proposed plan could generate water demands that surpass water supplies, which could require the acquisition of additional water sources and the imposition of conservation requirements, these impacts would be potentially significant (PS).*

Mitigation Measures PUF2(a), PUF2(b), and PUF2(c) are included to address impacts related to water supply. These mitigation measures would require implementing agencies to coordinate with relevant water service providers to ensure adequate water supply; implementation of water conservation measures; and use of reclaimed water. However, the Draft EIR concluded that, although these measures can be implemented, it cannot be determined with certainty that all water supply impacts would be reduced to a less than significant level and impacts were determined to be significant and unavoidable.-2(a), PUF-2(b), and PUF-2(c) are included to address -supply impacts would be reduced to a less-than-significant level

Comment I33-3

I would specifically like to know the extent to which you have taken the legally **mandated Sustainable Groundwater Management Act of 2014 (SGMA)** into account, and have state and local representatives on board with your water supply needs. This law basically states that Californians put more water into the ground than they take out. Compliance deadline is 2040. Your water needs must be built into this plan, and I would like to know if that is the case and if not what the reasoning is.

Response I33-3

Section 3.10, "Hydrology and Water Quality," identifies groundwater resources in the plan area, describes the regulatory framework governing groundwater management, and evaluates the potential environmental impacts of the proposed plan related to groundwater supply.

Section 3.10.2, "Regulatory Setting," identifies the Sustainable Groundwater Management Act (SGMA) as the primary regulatory framework for local management of groundwater basins to achieve long-term sustainability. Groundwater management under SGMA is led by locally formed Groundwater Sustainability Agencies (GSAs), with technical oversight by the Department of Water Resources. As described in the Draft EIR, SGMA requires all high- and medium-priority groundwater basins to be managed under adopted Groundwater Sustainability Plans (GSPs) or equivalent plans. GSAs are

responsible for achieving sustainable groundwater management for these high- and medium-priority groundwater basins within 20 years of implementing their GSPs (generally by 2042), while critically over-drafted basis must achieve groundwater sustainability by 2040.

Impact HYDRO-2 in Section 3.10.3, "Impact Analysis," of the Draft EIR evaluates whether the proposed plan's forecasted land use development, sea level rise adaptation projects, and transportation projects would substantially decrease groundwater supplies or interfere with groundwater recharge in a manner that would impede sustainable groundwater management. Based on the proposed plan's emphasis on infill development, existing regulatory requirements for stormwater management and low-impact development, and ongoing SGMA implementation by GSAs, the Draft EIR concluded that impacts to sustainable groundwater management would be less than significant.

The proposed plan would not involve activities that would conflict with or supersede SGMA implementation. Groundwater management and compliance with SGMA remain the responsibility of local GSAs. Future projects implemented under the proposed plan would be subject to project-level review for compliance with applicable regulatory requirements related to groundwater management.

Comment I33-4

In my view this Draft EIR needs tremendous work as the project impact of Plan Bay Area 2050+ is so significant.

Thank you for your consideration.

Response I33-4

The analysis in the Draft EIR complies with MTC and ABAG's obligation to disclose potential impacts and identify feasible mitigation measures. The comment does not raise specific environmental issues. The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I34 Liang Chao 1

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I34-1

Thank you for the opportunity to comment on the Draft Plan Bay Area 2050+. I have several concerns about the assumptions underlying the Plan's Regional Growth Forecast. In particular:

- **The population forecast is nearly four times higher than the State of California's official demographic projection for the Bay Area**.
- **The Plan uses a non-standard, backward modeling methodology** that derives population from policy-driven job assumptions rather than from demographic fundamentals—an approach the Draft Plan itself acknowledges "differs" from conventional forecasting methods.
- **Two major structural shifts—remote work / gig-economy out-migration and AI-driven job automation—are not incorporated** into the growth forecast, even though they are already reshaping employment patterns and migration in the region.

- Because the growth forecast directly influences **RHNA allocations, CEQA transportation modeling, infrastructure planning, and long-term fiscal commitments**, using an overstated and reverseengineered forecast risks misdirecting public resources across the region.

To ensure more realistic and resilient planning, I respectfully submit the following detailed comments.

Response I34-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth.

The proposed plan is a limited and focused update to Plan Bay Area 2050 and does not accompany an RHNA cycle. The proposed plan does not establish new state-mandated RHNA numbers for any jurisdiction. The RHNA process is conducted on an 8-year cycle. The Bay Area is currently in the 6th RHNA cycle, which began February 1, 2023 and will continue through January 31, 2031. Therefore, the plan does not coincide with this update to the region's long-range plan. The 7th RHNA cycle, and the consultation with HCD, will take place in the context of the revised draft forecast for Plan Bay Area 2060.

Comment I34-2

1. The Draft Plan's Population Growth Forecast Is Nearly Four Times Higher Than the State's Official Projection

The key forecast figures appear in the Draft Plan:

- **Population & households in 2050:**
  "Plan Bay Area 2050+ plans **for 9.6 million people and 3.8 million households** for the Bay Area in 2050."

- **Jobs in 2050:**
  "Plan Bay Area 2050+ anticipates there being **5.4 million jobs** in the Bay Area in 2050."

- **New jobs & households (2023–2050):**
  "By 2050, the Regional Growth Forecast predicts **about 1.3 million new jobs and more than 900,000 new households** …"

Using these numbers, the Plan assumes +1.84 million additional residents by 2050. By contrast, the California Department of Finance (DOF/DRU) projects approximately +0.49 million new residents for the same nine counties.

Mathematically:

1.84 million (PBA 2050+)0.49 million (DOF/DRU)≈3.75\frac{1.84\ \text{million (PBA 2050+)}}{0.49\ \text{million (DOF/DRU)}} \approx 3.750.49 million (DOF/DRU)1.84 million (PBA 2050+)≈3.75

Plan Bay Area 2050+ therefore assumes nearly four times the growth projected by the State's demographers.

California-wide comparison makes the discrepancy even larger

DOF's statewide forecast shows **only about +1.0 million population growth** for the entire State of California through 2050. Yet the Draft Plan allocates +**1.84 million** of that growth to the Bay Area alone—meaning the Bay Area would grow almost **twice as much as the entire state**.

Given statewide demographic trends—aging population, declining birth rates, persistent out-migration—this outcome is not plausible without explanation.

The Draft Plan notes that its 2050 forecast is lower than the previous plan by 750,000 people, but provides no rationale for continuing to exceed DOF projections by such a large margin.

Response I34-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth.

Comment I34-3

2. PBA 2050+ Uses a Non-Standard, Backward Modeling Methodology

The Draft Plan states that its forecasting approach "**differs**" from conventional projections and that this is why "**numbers may be different**."

Unlike traditional demographic forecasting (which starts from births, deaths, and migration), Plan Bay Area uses a **policy-driven economic model (REMI)** in which:

1. Planners set **desired land-use and transportation outcomes** (housing levels, development patterns, transit investments);

2. The model generates **job totals** consistent with those policy assumptions;

3. Population and household counts are then **derived from job totals**, not from demographic fundamentals.

This approach **reverse-engineers** population growth from policy goals rather than forecasting it using standard demographic methods. As a result:

- Optimistic job assumptions **inflate population projections**,
- RHNA numbers and housing needs become **policy-driven outputs**,
- And this methodological choice explains much of the divergence between PBA 2050+ and DOF/DRU projections.

Given its non-standard nature, this model should not be used as the sole basis for regional statutory obligations, including RHNA, CEQA transportation baselines, or transportation conformity.

Response I34-3

Please refer to Response I34-1.

Comment I34-4

3. Remote Work & the Gig Economy Are Not Modeled, Yet They Weaken the "Jobs → Population" Link

The Draft Plan acknowledges the permanence of remote work:

- "**Nearly 27% of the workforce worked from home in 2023** … compared to 11% in 2011." *(Executive Summary, p. 3)*
- "**25% of all workers could be working from home** on a typical workday by 2050."

However, the Plan **does not model** the most significant demographic implication:

Remote workers employed by Bay Area firms no longer need to live in the Bay Area.

External research shows:

- ≈ **45% of Bay Area jobs** are remote-eligible.
- Bay Area net out-migration has **more than doubled** since 2018–19, driven by remote-eligible highincome households (PPIC).
- Downtown vacancy rates exceeding **25–30%** indicate long-term workplace decentralization.

Illustrative population impact

If 25%–50% of ~1.7–1.8 million remote-eligible jobs are held by people living outside the nine-county region:

- **400,000–900,000 fewer Bay Area residents** would be expected by 2050.

This alone could eliminate much of the gap between DOF projections and PBA 2050+.

Yet the Plan includes no scenario analyzing remote-work out-migration—even though the plan emphasizes remote work as an enduring trend.

Response I34-4

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. For Plan Bay Area 2050+, MTC and ABAG carried forward the adopted methodology while updating inputs to reflect significant post-COVID demographic and economic changes, resulting in lower long-term projections relative to the prior forecast. MTC and ABAG acknowledge that factors such as remote work patterns and evolving labor market changes, including potential AI-related impacts, remain uncertain and will continue to be monitored and considered in future updates. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth, which is developed using an adopted regional forecasting methodology designed for RTP/SCS planning and analysis purposes.

Comment I34-5

4. AI & Automation Risks Are Not Incorporated into the Job Forecast

Although the Plan references technological innovation, it does **not** model the effects of **AI-driven job loss or task automation**, even though the Bay Area is one of the world's most exposed regions.

Global and national studies show:

- **60% of jobs** in advanced economies are exposed to AI (IMF).
- Up to **30% of U.S. work hours** could be automated by 2030 (McKinsey).
- Bay Area tech/professional sectors have the **highest concentration of AI-exposed**
- **occupations** (Brookings).

Despite this, the Plan assumes:

- **5.4 million jobs** in 2050,
- **1.3 million net new jobs**, and
  continued expansion of high-wage occupations.

A realistic forecast must include at least one downside job trajectory reflecting AI automation, reduced hiring, job polarization, or productivity growth without proportional employment growth.

Response I34-5
Please refer to Response I34-4.

Comment I34-6
5. Why This Overestimation Creates Serious Risks

Housing & RHNA Cities may be required to zone for hundreds of thousands of units that will never be needed, undermining credibility and wasting resources.

Infrastructure & Fiscal Burden Overbuilt utilities, transit capacity, and public facilities create long-term maintenance liabilities for cities and counties.

Transportation & Climate Modeling Inflated baselines for population and jobs distort VMT modeling, emissions forecasts, and transportation funding priorities.

Response I34-6
The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The proposed plan does not establish new state-mandated RHNA numbers for any jurisdiction. The region's cities, towns, and counties retain local land use authority, and local jurisdictions will continue to determine where future development occurs and the need for infrastructure development. The proposed plan is supported through implementation efforts, such as neighborhood-level planning grants for Priority Development Areas and local technical assistance. As a general rule, development would be proposed to meet market demand and would be conducted by private developers. The proposed plan does not mandate any changes to local zoning rules, general plans, or processes for reviewing projects, nor does the plan provide an enforceable direct or indirect cap on development locations or targets in the region. As is the case across California, the Bay Area's cities, towns, and counties maintain control of all decisions to adopt plans and to permit or deny development and infrastructure projects.

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth and "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding role and authority.

Comment I34-7
6. Requested Revisions

I respectfully request that MTC/ABAG:

1. **Reconcile** the Draft Plan's growth forecast with DOF/DRU's Bay Area and statewide projections or provide a transparent explanation for the divergence.

2. Develop a **Remote Work / Gig Economy Scenario** modeling 25%–50% of remote-eligible jobs being filled by non-residents.

3. Develop an **AI / Automation Disruption Scenario** showing slower job growth, job displacement, or reduced hiring.

4. Publish these scenarios as part of the Plan's technical forecasting materials for use by local jurisdictions.

5. Clarify which forecast series will govern **RHNA, CEQA conformity, and transportation modeling** (statutory planning obligations).

Response I34-7

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth. The plan strategies and priorities may be refined as conditions evolve, please refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities." The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I34-8

Conclusion

Plan Bay Area 2050+ will guide the region's most consequential decisions on housing, infrastructure, transportation, and climate for decades. For a plan of this significance, the growth forecast must:

- align with state demographic data,
- incorporate **remote work, gig economy trends, and AI automation**, and
- include multiple **alternative scenarios** reflecting uncertainty.

Thank you for considering these comments.

Response I34-8

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth. Please refer to Response I29-13 for additional discussions regarding multiple alternative scenarios. These conclusionary remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I35 Liang Chao 2

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I35-1

I submit these comments on the Draft Environmental Impact Report (Draft EIR) for Plan Bay Area 2050+ ("proposed plan"). My core concern is that the EIR does not adequately ensure that mitigation measures for several serious impacts are reasonable, enforceable, and sufficient, particularly in the areas of wildfire risk, water supply, and transportation/traffic. In several instances, the EIR itself concedes that impacts

would remain **significant and unavoidable**, yet the mitigation program is largely aspirational, reliant on local agency discretion, and based on optimistic assumptions about growth and infrastructure.

Response I35-1

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding the CEQA requirements for mitigation measures and significant and unavoidable impact determination.

Comment I35-2

Below I focus on three areas:

1. Wildfire risk and emergency evacuation

2. Water supply reliability and cumulative hydrology

3. Transportation, vehicle miles traveled (VMT), and traffic-related evacuation constraints

I also highlight several **false or unsupported assumptions** that undermine the adequacy of the EIR's analysis and mitigation framework.

Response I35-2

These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to Response I35-3 through Response I35-11.

Comment I35-3

1. Wildfire Risk and Emergency Evacuation – Significant and Unavoidable Impacts

The EIR acknowledges that implementation of the proposed plan would exacerbate the risk of wildland fires and contribute to cumulative wildfire and evacuation hazards:

- **Impact HAZ-7** finds that projected land use patterns and infrastructure in or near **State Responsibility Areas and Very High Fire Severity Zones** would exacerbate the wildfire risk, pollutant release, and related flooding and landslides. Even with Mitigation Measure HAZ-7, the EIR ultimately characterizes this impact as **significant and unavoidable (SU)** in the regional context.

- **Impact HAZ-6** concludes that population increases and infrastructure expansion associated with the plan **may impair emergency response and evacuation procedures**, especially in constrained corridors. The EIR explicitly acknowledges this impact may remain **Significant and Unavoidable (SU)** if mitigation is not universally implemented.

- **CUM-8 (Cumulative Wildfire/Evacuation Impacts):** The EIR's cumulative analysis (CUM-8) concludes that, because wildfire risk and evacuation constraints are regional in nature, the incremental contribution of the proposed plan to cumulative wildfire and evacuation impacts would be **Significant and Unavoidable (SU)** as well.

Response I35-3

The commenter correctly notes the significant and unavoidable impact determination related to Impacts HAZ-6, HAZ-7, and CUM-8. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding significant and unavoidable impact determination.

Comment I35-4
Growth Geographies and misleading implications of risk reduction

At the same time, the Project Description states that Growth Geographies **exclude CAL FIRE-mapped Very High and High Fire Severity Areas and certain Wildland-Urban Interface (WUI) areas**. This creates an impression that the plan largely "solves" the wildfire siting problem by drawing growth away from the worstmapped areas. However, the EIR immediately concedes that:

- Development could still occur **near** very high hazard zones,
- Infrastructure could be extended through these areas, and
- **Evacuation procedures could be adversely affected** (HAZ-6, CUM-8).

In other words, the plan's growth-management tools do not actually eliminate the risk; they only partially redirect it, and not necessarily toward safer evacuation corridors.

Response I35-4
The commenter is correct that the Very High and High Fire Hazard Severity zones identified by the California Department of Forestry and Fire Protection or locations within a county-adopted wildland-urban interface area are excluded from Growth Geographies. As discussed on page 3.9-46 of the Draft EIR, the proposed plan's strategies focus 73% of the land use growth footprint into designated Growth Geographies. However, the remainder (27%) of the land use growth footprint is outside designated Growth Geographies but consistent with existing local land use plans. As a result, approximately 60 acres and 330 acres of the land use growth footprint would overlap with High and Very High Fire Hazards Severity zones, respectively (Table 3.9-8 of the Draft EIR). The region's cities, towns, and counties retain local land use authority, and local jurisdictions would continue to determine where future development occurs. The proposed plan does not mandate any changes to local zoning rules, general plans, or processes for reviewing projects, nor does the plan provide an enforceable direct or indirect cap on development locations or targets in the region. Therefore, although majority of the Growth Geographies are outside of the Very High and High Fire Hazard Severity zones, development could still occur near and within High and Very High Fire Hazards Severity zones.

Comment I35-5
Concerns with the wildfire mitigation program

Mitigation Measure **HAZ-7** lists a suite of actions—compliance with Title 14 wildfire standards, public education, defensible space enforcement, fuels management, and fuel breaks, as well as "information sharing" by MTC. But:

- These are **highly generalized and discretionary: "where feasible" measur**es that are to be implemented at the discretion of local agencies.
- The EIR explicitly notes that MTC/ABAG **cannot require** local jurisdictions to adopt such measures.
- Therefore, significance remains **Significant and Unavoidable (SU)** if any jurisdiction does not adopt them.

Thus, the regional mitigation approach effectively defers real wildfire risk management to future local decisions, without providing enforceable performance standards. **Under CEQA, deferral of mitigation is**

only permissible where the EIR commits to specific performance criteria and a clear mechanism to ensure they are met. Here, neither is clearly articulated at the regional level.

Response I35-5

Please refer to "Master Response 2, EIR Mitigation Measures" for a discussion regarding CEQA requirements for mitigation measures, deferred mitigation, and performance criteria.

Comment I35-6

Requested revisions / additions

To make the wildfire/evacuation mitigation program more reasonable and enforceable, I request that the Final EIR:

1. **Tie regional funding and consistency determinations to wildfire-related performance standard**s (e.g., maximum population-to-evacuation-route ratios).

2. Condition funding on adoption of local:

   - Fire-hardening ordinances,
   - Defensible-space implementation, and
   - Fuels-management programs for Growth Geographies near WUI.

3. **Add or strengthen alternatives that reduce population and employment growth in high-risk WUI areas** beyond simple "exclusion mapping," including an alternative that meaningfully shifts growth away from congested evacuation corridors.

4. **Clarify how local general plans and hazard mitigation plans** will be required to incorporate the EIR's wildfire mitigation commitments to ensure they are not merely "recommended best practices."

Without these additions, **the EIR does not demonstrate that wildfire and evacuation risks have been mitigated to the maximum extent feasible**.

Response I35-6

The proposed plan does not include wildfire and evacuation mitigation programs. However, Mitigation Measures HAZ-6 and HAZ-7 identified in the Draft EIR would reduce impacts related to evacuation and wildfire, respectively, for individual development projects under the plan. The proposed plan is an RTP/SCS and does not cover local general plans and hazard mitigation plans as part of the defined project. Please refer to "Master Response 2: EIR Mitigation Measures," for a discussion regarding funding mechanisms and implementation responsibility of the proposed mitigation measures.

Please refer to "Master Response 3: Plan Alternatives," for a discussion regarding the level of growth assumed in the alternatives and the reasonable range of alternatives discussed in the Draft EIR.

Comment I35-7

2. Water Supply Reliability – Significant and Unavoidable but Treated as Cumulatively Benign

The EIR acknowledges a Significant and Unavoidable water supply impact:

- Impact PUF-1 — Significant and Unavoidable (SU) if not fully mitigated: Environmental impacts from new or expanded utility infrastructure.

- Impact PUF-2 — Significant and Unavoidable (SU): Insufficient water supplies in normal, dry, and multiple-dry-year scenarios.
- Impact PUF-3 — Significant and Unavoidable (SU): Wastewater treatment capacity shortfalls.
- Impact PUF-4 — Significant and Unavoidable (SU): Solid waste and landfill capacity limitations.

Even with Mitigation Measure PUF-2(a)–(c), **Impact PUF-2** remains **Significant and Unavoidable (SU)**.

Mitigation PUF-2 relies on local agencies and project sponsors to:

- Coordinate with water providers and prepare SB 610/SB 221 assessments,
- Implement water-conservation measures and drought-tolerant landscaping, and
- Use or plan for reclaimed water systems.

Notably, the EIR's **Alternatives** chapter shows that all evaluated alternatives—including the No Project Alternative—have **Significant and Unavoidable** impacts for PUF-1 through PUF-4, including water supply.

Yet in the **Other CEQA-Mandated Sections**, the EIR concludes **that cumulative hydrology and water resources impacts are "less than significant" (LTS)** and that existing regulations will adequately address water resource impacts.

This appears internally inconsistent:

- If project-level and program-level water supply impacts **(PUF-2)** are **SU even after mitigation**,
- it is difficult to justify a finding that the **cumulative** water-resource impact of the plan is not cumulatively considerable.

This creates a **false assurance** that water resource issues will be adequately managed by existing regulations, when the EIR's own impact findings say otherwise.

Response I35-7

The comment considers two distinct CEQA issue areas that are addressed independently in the Draft EIR: (1) hydrology and water quality and (2) public utilities and facilities. Please refer to Response A3-9 regarding the mentioned inconsistencies between project and program level water supply analysis and cumulative impacts.

Please refer to "Mater Response 2: Mitigation Measures" for a discussion of significant and unavoidable findings after mitigation.

Significance conclusions in the respective sections are neither inconsistent nor contradictory. CEQA allows a project to have significant and unavoidable impacts in one resource area (public utilities and facilities) while also having a less than significant cumulative impact in another (hydrology and water quality), provided the analyses address different environmental topics and apply the appropriate significance thresholds.

Comment I35-8
Requested revisions / additions

1. **Reassess the cumulative hydrology and water resources conclusion.**
   The cumulative analysis should be revised to reflect that water supply constraints are significant and unavoidable regionally, particularly under prolonged drought and climate-change scenarios.

2. **Strengthen performance-based water supply mitigation.**
   The EIR should include regional-level performance standards, for example:

   - Requiring demonstration of firm, drought-resilient supplies (under multi-dry-year climate scenarios) as a **precondition** to allocating substantial new housing and job growth to a given area, and

   - Conditioning regional transportation and housing funds on water-supply sufficiency findings that are independent and not solely based on optimistic local projections.

3. **Integrate growth-forecast uncertainty**.
   The EIR relies on a fixed regional growth forecast. If, as discussed in separate comments on the Plan document, that forecast is **substantially higher than State DOF projections**, the EIR should acknowledge that water-supply analyses may be based on inflated demand assumptions—both overstating the need for risky infrastructure expansion and understating the feasibility of lower-impact growth patterns. At minimum, the EIR should analyze a **reduced-growth alternative** that better aligns with State demographic projections and reassess water impacts under that scenario.

Response I35-8
Cumulative water supply impacts are discussed on page 5-19 of the Draft EIR under "Public Utilities and Facilities." As concluded on page 5-19 of the Draft EIR cumulative water supply impacts would be cumulatively considerable and significant.

Please refer to "Master Response 2: Mitigation Measures" regarding the enforceability of mitigation measures and funding mechanisms related to mitigation measures. As discussed in Response I33-2 mitigation measures in Draft EIR require performance standards to ensure water supply for future development projects under the plan.

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth and "Master Response 3: Plan Alternatives" for a discussion regarding alternatives chosen for analysis in the Draft EIR.

Comment I35-9
3. Transportation, VMT, and Traffic Impacts – Persistent Conflicts with CEQA VMT Standards

The EIR identifies a key transportation impact:

- **Impact TRA-2: Conflict or be inconsistent with CEQA Guidelines §15064.3(b) (VMT-based significance)** is found to be potentially significant (PS) and Significant and Unavoidable (SU) even with mitigation.

- **Mitigation TRA-2** is programmatic and non-binding, relying on voluntary TDM and uncertain pricing strategies.

- The Executive Summary confirms TRA-2 remains **Significant and Unavoidable (SU)** under all alternatives.

Mitigation Measure **TRA-2** is largely programmatic:

- MTC "shall work with State and local agencies" to implement plan components that reduce VMT, including improved transit, bike, and pedestrian facilities, and exploration of VMT fees, banks, and exchanges.

- Local agencies "shall" implement transportation demand management (TDM) strategies **"where feasible"**, referencing FHWA guidance and listing possible measures (parking pricing, transit passes, bike/ped improvements, etc.).

However, the Executive Summary explicitly notes that significance remains **Significant and Unavoidable (SU)** for TRA-2 even with these measures.

The **Project Description** further reveals that:

- The proposed plan includes **new priced freeway lanes**, peak-period tolling on all Bay Area highways, and a targeted set of freeway widenings—albeit with VMT mitigation reserves.

- Overall roadway lane-miles increase, and priced lane share rises dramatically (from 14% to 100% of freeway lane-miles).

This combination of continued **freeway expansion**, ambitious but politically uncertain pricing strategies, and reliance on voluntary local TDM measures forms the core of the VMT mitigation program. Yet the EIR still finds TRA-2 to be significant and unavoidable.

Response I35-9

As disclosed in the Draft EIR, the proposed plan would result in an increase in total regional VMT. Mitigation Measure TRA-2 was framed as programmatic and policy-based because the project is a long-range, regional transportation plan that does not itself approve or construct individual projects. Please refer to "Master Response 4: Plan Level Document" regarding the program analysis of the Draft EIR. Consistent with CEQA requirements for program-level EIRs, the transportation mitigation focuses on feasible strategies within the authority of MTC, ABAG, and implementing agencies. Mitigation includes expansion of transit, bicycle, and pedestrian facilities; implementation of pricing strategies; and application of transportation demand management measures by local jurisdictions where feasible. These measures reflect best practices identified in State and federal guidance for reducing VMT at a regional level.

The Draft EIR acknowledges the inherent uncertainty associated with future implementation of pricing programs, TDM measures, and local land use decisions, many of which require subsequent discretionary actions, funding commitments, and policy approvals by other agencies, some of which may be controversial. Please refer to "Master Response 2: Mitigation Measures" regarding implementation and feasibility of mitigation in the Draft EIR. CEQA does not require mitigation measures to guarantee full elimination of an impact, nor does it require mitigation to be fully enforceable at the program level when the lead agency lacks direct control over future project-level decisions. Instead, CEQA requires that feasible mitigation be identified and adopted to lessen impacts where possible.

The finding that Impact TRA-2 remains significant and unavoidable reflects a conservative disclosure that, even with the identified mitigation strategies, it cannot be guaranteed that projected VMT increases would be reduced below the significance threshold at the regional scale. Please refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable impact determinations in the Draft EIR. This

conclusion demonstrates compliance with CEQA's mandate to disclose significant environmental effects that cannot be fully mitigated. Future projects implemented under the plan would be subject to separate environmental review, at which time project-specific VMT impacts and more detailed, enforceable mitigation measures would be identified and evaluated as appropriate.

Comment I35-10
Emergency evacuation and traffic (HAZ-6)

The EIR also finds:

- **Impact HAZ-6**: Emergency response/evacuation impacts remain **Significant and Unavoidable** due to increased population and congestion.
- Under the No Project Alternative, evacuation congestion would be less severe, demonstrating the proposed plan **worsens evacuation constraints**, even if per-capita VMT improves.

This admits a critical fact: **concentrating growth in certain corridors under the proposed plan can worsen traffic-related evacuation constraints**, even if per-capita VMT is reduced region-wide.

Requested revisions / additions

1. **Add a more aggressive VMT-reduction alternative.**
2. The Alternatives analysis shows TRA-2 remains SU under all alternatives, but all alternatives share the same growth forecast and a similar overall strategy mix. The EIR should analyze at least one true **VMT-minimizing alternative**, such as:
    - Eliminating or scaling back freeway expansion (Strategy T7),
    - Earlier and more aggressive implementation of pricing (T5), and
    - Greater emphasis on transit access to major job centers.
3. **Clarify feasibility and timing of key mitigation strategies.**
   Because CEQA mitigation must be **feasible**, the EIR should more frankly assess:
    - The political and legal feasibility of implementing region-wide peak tolling and VMT fees within the plan horizon, and
    - How delays or partial implementation would affect VMT and evacuation impacts.
4. **Tie emergency evacuation capacity to growth allocations.**
   To address HAZ-6, the EIR should commit to specific regional criteria (e.g., maximum vehicles per lane on evacuation routes, minimum transit evacuation capacity) that must be met before significant additional growth is directed to high-congestion corridors.

Response I35-10
The format of the comparative impact analysis of alternatives is structured to examine how impacts from each alternative would compare to impacts of the proposed plan. The comment is correct in stating that the impact related to interference with an adopted emergency response plan or evacuation plan would be significant and unavoidable under the proposed plan, and the impact under the No Project Alternative would be less than those that would occur under the proposed plan. The daily per capita VMT under the proposed plan would be less than under the No Project Alternative. With regard to a VTM-reduction alternative, Alternative 1, No New Highway Capacity and Transit Reinvestment Alternative, would remove

regionally significant roadway expansion and extension projects under Strategies T6, T7, T8, and T11. As a result, Alternative 1 would result in the lowest daily VMT compared to the proposed plan, No Program Alternative, and Alternative 2 (pages 4-70 of the Draft EIR). Please refer to "Master Response 3: Plan Alternatives" for discussion regarding the reasonable range of alternatives included in the Draft EIR and the level of growth assumed across all alternatives. Please refer to "Master Response 2: EIR Mitigation Measures" regarding the feasibility of the proposed mitigation measures. Mitigation Measure HAZ-6 meets all mitigation requirements under CEQA and requests to add specific regional criteria have not been added to the mitigation because such criteria would be outside of the authority of MTC and ABAG, as well as implementing agencies for future projects under the plan.

Comment I35-11

4. Questionable Core Assumptions Underlying the EIR

Finally, several foundational assumptions in the Draft EIR merit scrutiny:

1. **Growth treated as exogenous and fixed across alternatives.**

   The EIR's growth-inducing analysis describes the proposed plan as a long-range regional plan intended to "accommodate forecasted regional growth," implying that population and employment growth are fixed inputs rather than outcomes influenced by land use and transportation policy. All alternatives use the same growth forecast. This approach:

   - Understates the plan's **growth-inducing potential** (e.g., by expanding infrastructure and upzoning in particular locations), and
   - Prevents meaningful comparison between a high-growth and a reduced-growth scenario—something especially relevant given the plan's divergence from State demographic projections and emerging trends in remote work and AI-driven job displacement.

Response I35-11

Please refer to "Master Response 3: Plan Alternatives" for a discussion regarding the level of growth assumed across alternatives.

Comment I35-12

2. **Over-reliance on existing regulations and voluntary local action.**
   For wildfire, hydrology, water, and transportation, the EIR repeatedly states that existing regulations and local agency implementation will adequately address impacts, even where the EIR's own impact findings remain **significant and unavoidable**. This is not a substitute for **enforceable, performancebased regional mitigation**.

Response I35-12

Please refer to "Master Response 2, EIR Mitigation Measures" for a discussion regarding significant and unavoidable impact determinations in the Draft EIR and their enforceable and performance based metrics.

Comment I35-13

3. **Internal inconsistencies between impact sections and cumulative findings.**
   As noted above, water supply is SU (PUF-2) for all alternatives, yet cumulative hydrology is deemed less than significant. This discrepancy undermines the credibility of the cumulative analysis.

Response I35-13

Please refer to Response A3-9 for a discussion regarding water supply impact determination and hydrology and water quality cumulative impact determination.

Comment I35-14

4. **Infrastructure expansion in hazard areas framed as mitigation.**
   The EIR notes that some plan features—such as maintaining urban growth boundaries and supporting vegetation management—reduce wildfire risk, but the plan also indirectly encourages infrastructure extensions through high-hazard areas, contributing to SU wildfire and evacuation impacts. The EIR should be clearer about this tradeoff and explore alternatives that better minimize such extensions.

Response I35-14

The acreage of the proposed plan's land use growth footprint, sea level rise projects footprint, and transportation projects footprint overlap with fire hazard severity zones are presented in the Draft EIR Tables 3.9-8 (page 3.9-46), 3.9-9 (page 3.9-49), and 3.9-10 (3.9-50), respectively. The conclusion in the Draft EIR are based on the information presented in Tables 3.9-8 through 3.9-10 as follows:

> *Curtailing development in areas mapped by CAL FIRE as high and very high FHSZs, in conjunction with the mitigation measures and elements of the plan that would promote land management in open space to reduce fire hazards, would substantially reduce the potential for the plan to exacerbate wildland fire risks. However, because development could occur in and near SRAs and lands classified as very high FHSZs, and because the potential for people or structure to be exposed to significant risk of loss, Injury, or death involving wildfire cannot be avoided, this impact would be* ***significant and unavoidable (SU)****.*

Therefore, it is stated in the Draft EIR that potential development could occur in or near the lands classified as very high fire hazard severity zones and impacts would be significant and unavoidable. No additional clarification in the EIR is required.

Please refer to "Master Response 3: Plan Alternatives," for a discussion regarding the reasonable range of alternatives included in the Draft EIR.

Comment I35-15

Conclusion

The Draft EIR correctly identifies many serious environmental consequences of implementing Plan Bay Area 2050+, especially in wildfire risk (HAZ-7, HAZ-6, CUM-8), water supply (PUF-2), and VMT (TRA-2). However, in several key respects, it falls short of CEQA's requirement to provide:

- A realistic, internally consistent assessment of cumulative impacts;
- Feasible, enforceable mitigation measures that reduce impacts to the extent possible; and
- A reasonable range of alternatives, including reduced-growth and more VMT-minimizing options.

I respectfully request that MTC and ABAG:

> 1. Revise the Draft EIR to correct the inconsistencies discussed above (especially in the cumulative hydrology and wildfire sections);
>
> 2. Strengthen and tie key mitigations to regional performance standards and funding decisions;

3. Add at least one reduced-growth and one more aggressive VMT-reduction alternative; and

4. Explicitly acknowledge in the Final EIR that, where impacts remain Significant and Unavoidable, any adoption of the plan will require a carefully reasoned Statement of Overriding Considerations that is transparent to the public.

Thank you for the opportunity to comment. I would be happy to provide further detail or participate in any follow-up discussions.

Response I35-15

The comment requests revision to correct the perceived inconsistencies in the cumulative hydrology and wildfire sections but does not provide specific information regarding the inconsistencies. Please refer to Response A3-9 regarding stated inconsistencies between the two sections in the Draft EIR.

Please refer to "Master Response 2: EIR Mitigation Measures" regarding performance standards included in mitigation measures in the Draft EIR and funding mechanisms. Please refer to "Master Response 3: Plan Alternatives" regarding a reasonable range of alternatives and alternatives chosen for analysis in the Draft EIR.

If an agency approves a project that will have significant environmental impacts, it must adopt a statement of overriding considerations that finds that "specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment." (Pub. Resources code, Section 21081(b); CEQA Guidelines, Section 15021(d), 15093(b)-(c).) A statement of overriding considerations will be adopted and published for public review if MTC and ABAG approve the proposed plan and certified the EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I36 Liang Chao 3

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I36-1

This letter provides additional CEQA comments on the Draft Environmental Impact Report ("Draft EIR") for Plan Bay Area 2050+. It supplements my prior submittals on growth forecasting, wildfire, water supply, and transportation impacts. This letter focuses on **hospitals, public services, utilities, emergency response, schools, stormwater, wastewater, and landfill capacity**—areas where the Draft EIR relies on unenforceable mitigation, or minimizes impacts that the Draft EIR itself identifies as Significant and Unavoidable (SU).

Across these categories, the Draft EIR's own findings show that several infrastructure and service impacts cannot be reduced to less than significant due to the inability of MTC/ABAG to compel local jurisdictions to implement mitigation. The issues are addressed in the following order:

1. Hospital and Healthcare Capacity — Ignored in the Cumulative Impact Analysis

2. Fire, EMS, and Police Services — Insufficient Analysis and Deferred Mitigation

3. Public Utilities — Wastewater, Stormwater, and Electric Grid Impacts Are Understated

4. Solid Waste and Landfill Capacity — Missing Regional Capacity Analysis

5. Emergency Response, Evacuation, and Functional Recovery — Major CEQA Gap

6. Schools and Educational Facilities — Reliance on SB 50 Is Not CEQA Mitigation

Response I36-1
These introductory remarks are acknowledged for the record and will be provided to the MTC Commission and ABAG Executive Board for consideration. Please refer to "Master Response 2: Mitigation Measures" and Responses I36-2 through I36-7.

Comment I36-2
1. Hospital and Healthcare Capacity — Ignored in the Cumulative Impact Analysis

The Draft EIR treats hospitals and healthcare infrastructure under Impact PSR-1, which evaluates the need for **new or expanded fire, police, EMS, school, library, and other public facilities**. Hospitals fall within "other public facilities," yet the Draft EIR does not provide any meaningful quantitative analysis of hospital or ER capacity.

Impact PSR-1 is identified as Potentially Significant and remains Significant and Unavoidable (SU) if mitigation is not fully implemented by all local jurisdictions.

The Bay Area already faces:

- ER overcrowding
- Hospital bed shortages
- Regional inequities in access
- Acute staffing shortages

Yet the EIR defers mitigation to voluntary, future local actions and assumes expansions "as needed," without:

- A regional capacity analysis,
- Performance standards, or
- Any indication of funding feasibility.

Requested Revisions

- Conduct a **regional healthcare capacity assessment** in the Final EIR—trauma centers, ER load, bed supply, ICU capacity, psychiatric care, and vulnerable populations.
- Tie growth allocations to **demonstrated hospital and EMS capacity**, consistent with CEQA requirements that public facilities impacts be mitigated where feasible.
- Add enforceable mitigation linking new growth allocations to demonstrated healthcare system capacity.
- Include healthcare facilities in cumulative impact analysis.

Response I36-2

As stated on page 5-6 of the Draft EIR, the proposed plan is an RTP/SCS that includes transportation strategies to invest expected transportation revenues, housing and economic strategies to accommodate forecasted regional growth, and strategies to protect the environment, as well as protect the region from future sea level rise inundation. The plan itself is not growth inducing and would accommodate the region's forecasted growth in population, households, housing units, and jobs. Further, health care, like other essential services not typically addressed in the EIR (groceries stores and many other essential commercial products) is largely provided by the private sector, meaning that demand is typically addressed through market responses. It is an important distinction that public agencies cannot satisfy demand associated with these needs addressed by the private sector through mitigation because it cannot demand construction of a health care facility or a new grocery store (for example).

Additionally, analysis in the Draft EIR is programmatic, and as a result, specific details regarding the location of projects and growth are not known. At this program level analysis, identifying specific quantitative analysis of hospital or ER capacity is not possible. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis and "Master Response 2: EIR Mitigation Measures" for a discussion regarding deferred mitigation measures and significant and unavoidable impact determinations in the Draft EIR.

Comment I36-3

2. Fire, EMS, and Police Services — SU Without Enforceable Mitigation

The EIR determines that increased demand on fire protection, police, and EMS services is addressed under **Impact PSR-1**, but explicitly acknowledges the impact may remain **Significant and Unavoidable** if local jurisdictions do not adopt mitigation.

This conclusion is consistent with:

- **Impact HAZ-6**, which finds that increased population and development may impair **emergency response and evacuation**, remaining **SU** if not fully mitigated.
- **CUM-8**, which finds cumulative emergency evacuation impacts **SU regionwide**.

Concerns include:

- No regional performance standards (e.g., 4-minute fire response, 8-minute EMS response).
- No requirements for additional fire stations in high-growth PDAs.
- No analysis of police staffing shortages or EMS coverage gaps.

The EIR concludes impacts to fire, EMS, and police services are "less than significant," despite:

- Already significant wildfire and evacuation issues (classified as SU elsewhere),
- Severe staffing shortages across the region,
- No analysis of response times under projected growth.

Mitigation is deferred to local plans without regional performance standards—contrary to CEQA requirements for enforceability.

Requested Revisions

- Establish regional performance standards (e.g., fire response within 4 minutes, EMS within 8 minutes).
- Conduct a regional fire/EMS capacity analysis using both PBA and DOF growth scenarios.
- Condition regional funding on demonstrated service and staffing capacity.

Response I36-3

Please refer to Response I36-2. As discussed therein, the proposed plan is not growth inducing. Plan Bay Area 2050+ is a long-range regional plan implemented over time through actions by multiple agencies. Growth would occur consistent with local agencies planning documents, at which time public services related to police and fire stations, such as staffing shortages, would be evaluated. Individual projects under the plan would be subject to local requirements for public services performance standards. Additionally, at the program level analysis prepared for the plan and covering over 100 local jurisdictions and 9 counties and their individual needs, identifying specific quantitative analysis of police and fire capacity applicable to each jurisdiction is not possible. The analysis for Impact PSR-1 focuses on whether there would be substantial adverse impacts related to the need for new or physical altered government facilities, the construction of which could cause significant environmental impacts. Impacts related to new or expanded school, police, fire, emergency medical, and other government service facilities were determined to be potentially significant. Please refer to "Master Response 4: Program Level Document" regarding the level of analysis included in the Draft EIR.

Please refer to "Master Response 2: EIR Mitigation Measures," for a discussion regarding deferred mitigation measures, significant and unavoidable impact determination, and funding mechanisms.

Comment I36-4

3. Public Utilities — Wastewater, Stormwater, and Electric Grid Impacts Are Understated

Impact PUF-1 – Infrastructure expansion

Construction or expansion of water, wastewater, stormwater, or energy infrastructure could cause significant environmental impacts. This impact remains SU if not universally mitigated.

Impact PUF-2 – Water supply (SU)

The Draft EIR finds the region may be unable to provide sufficient potable water in normal, dry, and multi-dry years. This remains Significant and Unavoidable under all alternatives.

Impact PUF-3 – Wastewater treatment (SU)

Existing treatment plants may lack the capacity to serve projected growth, especially those exposed to sealevel rise in shoreline areas.

Impact PUF-4 – Solid waste and landfill capacity (SU)

Landfill capacity may be exceeded, and no region-wide mitigation program is identified.

Taken together, these findings indicate that the Plan's growth pattern drives four separate SU utilities impacts, raising major concerns about the feasibility of the Plan's service assumptions.

The Draft EIR finds most utility impacts "less than significant" because local agencies can expand infrastructure. This assumption is not realistic.

Wastewater Treatment

- Many Bay Area plants are at or near capacity.
- Sea-level rise threatens shoreline plants with inundation and groundwater intrusion.

Stormwater Systems

- Infill increases impervious surfaces and runoff volumes.
- The EIR does not track cumulative stormwater loads from multiple PDAs.

Electric Grid Capacity

- The Plan assumes major building electrification and EV adoption but does not analyze grid capacity, substation needs, or PSPS vulnerabilities.

Requested Revisions

- Add a regional wastewater/stormwater/grid capacity analysis.
- Require capacity demonstration and resilience standards before approving new growth in PDAs.
- Clarify funding sources and timelines for required upgrades.

Response I36-4

As discussed in Section 3.14, "Public Utilities and Facilities," of the Draft EIR, impacts for PUF-1 through PUF-4 would be significant and unavoidable. None of the impacts were concluded to be less than significant impacts. The Draft EIR further concludes that Impacts PUF-1 through PUF-4 would remain significant and unavoidable even with implementation of mitigation. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding mitigation measures requirements, significant and unavoidable impact determinations, and funding mechanisms.

Impacts related to stormwater systems are included in Section 3.10, "Hydrology and Water Quality," of the Draft EIR. Impacts related to stormwater runoff are included in Impact HYDRO-3. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. As a result of the program level analysis, specific details regarding the location of projects and growth are not known. At this program level analysis, identifying specific quantitative for stormwater grid capacity, stormwater loads for individual PDAs, c or the precise siting of future utility upgrades is not possible. The locations, designs, funding sources, and timelines for such improvements are not known at this stage and would be addressed, as required, in subsequent project-level environmental review.

Comment I36-5

4. Solid Waste and Landfill Capacity — Missing Regional Capacity Analysis

The EIR finds that **Impact PUF-4** (solid waste/landfill capacity) may remain **SU** in all alternatives, including No Project. Yet the Draft EIR provides no feasible regional strategy to address:

- Approaching landfill closures,
- Limited diversion/recycling throughput,
- Construction/demolition waste from infill development.

The Draft EIR instead relies on existing state recycling laws, which CEQA case law has repeatedly found **insufficient** as standalone mitigation.

Requested Revisions

- Prepare a regional solid waste and C&D capacity analysis.
- Require identification of new or expanded waste facilities to meet forecast demand.
- Include hazardous-material waste streams in industrial PDAs.

Response I36-5

The comment correctly notes that the Draft EIR finds Impact PUF-4 (Solid Waste and Landfill Capacity) to be significant and unavoidable under all alternatives, including the No Project Alternative. According to the CEQA Guidelines Appendix G for Utilities and Service Systems, an EIR is required to evaluate whether a project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and comply with federal, state, and local statutes and regulations related to solid waste. The State CEQA Guidelines require an EIR to evaluate whether a proposed project would generate solid waste in excess of state or local standards, in excess of the capacity of local infrastructure, or compliance with federal, state, and local management and regulations related to solid waste. Mitigation under CEQA to address solid waste would focus on reducing, recycling, and managing waste to meet application standards. The development of new or expanded solid water facilities to meet forecast demand would not reduce solid waste generation as required by CEQA. In addition, the responsibility to develop landfills, transfer stations, or recycling facilities lie with local solid-waste agencies rather than the regional planning entity. As discussed in Section 3.14, "Public Utilities and Facilities," the Draft EIR evaluates the plan's potential to generate solid waste relative to the permitted capacity of existing disposal and diversion facilities. Solid waste facilities and their capacities in the Bay Area are discussed on pages 3.14-16 through 3.14-19 of the Draft EIR and active Bay Area landfills and their remaining capacities are presented in Table 3.14-5 of the Draft EIR. Mitigation Measure PUF-4 would reduce impact associated with solid waste generation through application of landfill diversion approaches including re-using building materials, maintaining structures where applicable, developing construction waste management plans, and using guidance from Construction Materials Recycling Association. Mitigation Measure PUF-4 does not rely on existing State recycling laws to reduce impacts.

Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. As a result of the program level analysis, specific details regarding the exact amount of solid waste that would be generated by the proposed plan is not known. Therefore, it is not possible to prepare a regional solid waste capacity analysis or identify hazardous material waste streams in industrial PDAs.

Comment I36-6

5. Emergency Response, Evacuation, and Functional Recovery — Major CEQA Gap

Multiple interrelated impact findings show that emergency access remains a critical deficiency:

- **Impact HAZ-6**: Emergency response/evacuation impaired (SU).
- **Impact TRA-4**: Traffic increases may impede emergency access.
- **CUM-8**: Cumulative wildfire/evacuation impacts are **Significant and Unavoidable** regionwide.

Despite these findings, the Draft EIR does not:

- Provide evacuation capacity thresholds,

- Require functional recovery standards (72-hour restoration of critical services), or
- Tie growth allocations to emergency response capacity.

Given increased wildfire frequency and climate-related hazards, the lack of enforceable regional mitigation contradicts CEQA's requirements.

The EIR's own findings identify wildfire evacuation (HAZ-6) and wildfire risk (HAZ-7) as **Significant and Unavoidable**, yet emergency response capacity is not integrated into public services or transportation analysis.

The EIR does not evaluate:

- Evacuation-route congestion for PDAs in high-risk corridors,
- Post-disaster functional recovery (power/water/communications),
- Overlapping disaster scenarios (earthquake + fire + power shutoff),
- Disproportionate impacts on vulnerable populations.

Requested Revisions

- Add evacuation performance thresholds tied to growth allocations.
- Include functional recovery standards (e.g., critical services restored within 72 hours).
- Analyze combined hazards and cascading failures.

Response I36-6

The analysis in the Draft EIR is programmatic, and as a result, specific details regarding the location of projects and growth are not known. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. At this program level analysis, identifying specific evacuation route congestion in high-risk corridors is not possible. The Draft EIR identifies Mitigation Measure HAZ-6, which would address the need for adequate emergency access and would reduce the impact to emergency response plans or evacuation plans to a less-than-significant level. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be significant and unavoidable for purposes of this program-level review. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding mitigation measures requirements and significant and unavoidable impact determination.

Regarding the evaluation of post-disaster functional recovery and overlapping disaster scenarios, an analysis of the potential effects of existing environmental conditions on a project is not required by CEQA. However, when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users."]). Changes to the State CEQA Guidelines to reflect this decision were adopted on December 28, 2018. Therefore, the EIR analysis generally does not address the impacts of existing environmental conditions on a project's future users or residents.

With respect to disproportionate impacts on vulnerable populations, evaluation of environmental justice is not required by CEQA because it is not an impact to the natural or physical environment.

Comment I36-7

6. Schools and Educational Facilities — Reliance on SB 50 Is Not CEQA Mitigation

Under **Impact PSR-1**, schools are included with fire, police, and libraries. The EIR asserts that SB 50 fees mitigate impacts, but CEQA case law is clear: **SB 50 fees do NOT constitute CEQA mitigation**.

Missing from the Draft EIR:

- Impacts on special education capacity,
- Fiscal constraints, especially in Basic Aid districts,
- A district-by-district capacity analysis,
- Districts lacking land for new schools,
- Existing overcrowded campuses,

Thus, **PSR-1** must be considered **Significant and Unavoidable** for schools unless additional, enforceable mitigation is added.

Requested Revisions

- Conduct a school district–specific capacity analysis for high-growth PDAs.
- Analyze impacts to special education and specialized instructional services, including transportation accommodations.
- Identify potential new school sites and funding requirements.
- Add mitigation beyond SB 50, such as joint-use facilities or capacity thresholds.

Response I36-7

Please refer to Response I36-2. As discussed therein, the proposed plan is not growth inducing. Plan Bay Area 2050+ is a long-range regional plan implemented over time through actions by multiple agencies. Growth would occur consistent with local agencies planning documents, at which time public services related to the school capacity and the need for new schools would be evaluated in further detail. The Draft EIR presents a programmatic assessment of the potential impacts of the proposed plan, focusing on the entire set of projects, programs, and strategies contained in the proposed plan. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis.

The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time. As subsequent projects are proposed consistent with the approved plan, they would evaluated to determine school district capacity, special education needs, potential for new schools, and if mitigation beyond SB 50 is warranted. As stated in the Draft EIR and the legislation for SB 50, "payment of fees authorized by this legislation is deemed 'full and complete mitigation'; therefore, local agencies cannot require additional mitigation for any school impacts. School impacts fees would be used in combination with state and other funds to construct new schools." As included on page 3.13-15 of the Draft EIR Impact PSR-1 was determined to be significant and unavoidable, as requested by the commenter, and no revisions to the Draft EIR are required. Please also refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding feasible mitigation and performance standards in the Draft EIR.

Comment I36-8
Conclusion

The Draft EIR significantly understates or defers impacts on public services, utilities, hospitals, emergency response, and school capacity. These deficiencies must be corrected to comply with CEQA's requirements for:

- Full disclosure,
- Feasible mitigation,
- Performance standards, and
- Accurate cumulative impact assessment.

I respectfully request that these issues be thoroughly addressed in the Final EIR and that enforceable mitigation measures be adopted.

Thank you for considering these comments.

Response I36-8
Please refer to Responses I36-1 through I36-7. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding feasible mitigation and performance standards in the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I37 Liang Chao 4

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I37-1
Dear Members of MTC and ABAG:

Thank you for the opportunity to provide additional comments on the Draft Environmental Impact Report for Plan Bay Area 2050+ ("Draft EIR"). **This letter air quality, freeway-adjacent health risks, seismic and liquefaction hazards, sea-level rise and flooding, biological resources, environmental justice, and hazardous materials**—areas where the Draft EIR understates impacts, relies on unenforceable mitigation, or contains internal inconsistencies.

These issues include:

1. Air Quality & Health Risks from Freeway-Adjacent Development

2. Seismic Risk, Liquefaction, and Infrastructure Fragility

3. Sea-Level Rise, Flooding, and Unfunded Adaptation Measures

4. Biological Resource Fragmentation and Habitat Impacts

5. Solid Waste, Landfill Capacity, and Hazardous Materials

Each of these areas warrants substantial revision before certification of the EIR.

Response I37-1

These introductory remarks list a summary of the comments provided below. Please refer to Responses I37-2 through I37-6.

Comment I37-2

1. Air Quality & Freeway-Adjacent Health Risks — Understated and Under- Mitigated

The EIR acknowledges significant air-quality concerns under:

- **Impact AQ-2**: exposure of sensitive receptors to substantial pollutant concentrations.
- **Impact AQ-3**: conflict with air-quality plans.

Many Priority Development Areas (PDAs) lie immediately adjacent to freeways—corridors with some of the highest **PM2.5 and ultrafine particle concentrations** in the state. Numerous public health studies show substantially elevated rates of asthma and respiratory illness, cardiovascular disease, preterm birth, childhood developmental impacts.

The Draft EIR underestimates these risks by:

- Characterizing freeway-adjacent air pollution as a ““Existing regulations,”
- Not requiring any minimum filtration standards (MERV-13 or HEPA) for new housing near highways,
- Not restricting sensitive land uses (schools, childcare, senior housing) within 500 ft of freeways,
- Relying on local agency discretion for air quality protections.
- Relying on Generalized best practices.

Compounding these issues:

- **NOI-1** (construction noise) and **NOI-2** (traffic noise) remain significant in many urbanized areas.
- Noise pollution worsens freeway-adjacent health outcomes and reduces emergency communication audibility during evacuations (related to **HAZ-6**).

Requested Revisions

- Require **minimum indoor air-filtration standards (e.g., MERV-13 or higher)** for all housing near freeways.
- Add a mitigation measure requiring **enhanced indoor air filtratio**n for all residential and sensitive land uses within 500–1,000 ft of freeways.
- Prohibit or limit siting **schools, childcare centers, senior housing, and hospitals** in freeway influence zones unless enhanced mitigation is implemented.
- Require project-level **air monitoring** for freeway-proximate growth areas.
- Add a freeway-adjacent health-risk overlay to Growth Geographies.

Response I37-2

Impact AQ-4, on pages 3.4-53 through 3.4-64, of the Draft EIR evaluates the potential environmental and health-related impacts associated with sensitive receptors located near high-volume freeways at a programmatic, regional level. Please refer to "Master Response 4: Program Level Document." Mitigation Measures AQ-4(a), AQ-4(b), and AQ-4(c) through AQ-4(d) are identified to minimize the exposure of receptors near freeways to substantial pollutant concentrations that could have adverse health outcomes. These mitigation measures identify the potential measures that implementing agencies and project sponsors can implement for future projects where feasible. Specifically, Mitigation Measure AQ-4(a) requires that implementing agencies and/or project sponsors implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified within Measure AQ-4(a). The first bullet point under Mitigation Measure AQ-4(a) beginning on page 3.4-61 requires that implementing agencies and/or project sponsors implement the following or equally effective measure:

> Install operate and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13 (MERV-16 for projects located in the West Oakland Specific Plan area) or higher (BAAQMD 2016). The HVAC system shall include the following features: installation of a high-efficiency filter and/or carbon filter to filter particulates and other chemical matter from entering the building; either high-efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85% supply filters shall be used.

The use of "if feasible" language is appropriate for programmatic mitigation because MTC and ABAG cannot require local jurisdictions to adopt mitigation measures for future projects and is consistent with the streamlining provisions of SB 375. Local agencies retain discretion over project-level implementation, including funding, design, and approval of mitigation measures. Refer to "Master Response 2: EIR Mitigation Measures" regarding MTC and ABAG's obligation to disclose potential impacts and identify feasible mitigation measures.

Comment I37-3

2. Seismic Risk, Liquefaction, and Infrastructure Failure Infrastructure Fragility — Risks Underestimated

Much of the Bay Area's designated Priority Development Areas (PDAs) lie on::

- **Liquefaction zones,**
- Soft soils with **high ground shaking amplification**, and
- **Bay fill** with known seismic vulnerabilities.

Even though seismic hazards are addressed in **GEO-1** through **GEO-5**, the Draft EIR defers meaningful mitigation to local building codes. This is insufficient under CEQA for several reasons:

- Building codes **do not address post-earthquake habitability**, infrastructure lifeline failure, or multiday outages.
- The EIR does not analyze how increased residential or job density in these areas affects evacuation, **utility disruption**, or **economic displacement** following a major earthquake.
- The EIR does not consider alternatives that direct growth toward **geologically stable areas**.

Requested Revisions

- Add performance-based seismic resilience standards beyond simple code compliance (e.g., **functional recovery**).
- Require analysis of **evacuation feasibility after an earthquake**, not just wildfire-related evacuation (**HAZ-6**).
- Add a **Seismic Resilience Alternative** that shifts growth away from high-liquefaction and Bay-fill zones.
- Add mitigation requiring **infrastructure redundancy** (backup power, water, communications) in PDAs in liquefaction zones.

Response I37-3

Impacts GEO-1 through GEO-5 of the Draft EIR were determined to be less than significant and do not included mitigation measures. Evacuation impacts are included Section 3.9, "Hazards and Wildfire," and impacts related to utilities are included in Section 3.14, "Public Utilities and Facilities" of the Draft EIR. Please refer to "Master Response 3: Plan Alternatives" for a discussion regarding alternatives chosen for analysis in the Draft EIR.

Comment I37-4

3. Sea-Level Rise, Flooding & Storm Surge — Mitigation Deferred and Funding Uncertain

The Draft EIR treats all hydrology impacts (HYDRO-1 through HYDRO-6) as Less Than Significant, even though:

- **PUF-3** finds wastewater treatment capacity potentially **Significant and Unavoidable (SU)**
- Shoreline wastewater plants are vulnerable to **inundation and groundwater intrusion**
- **HAZ-7** acknowledges post-wildfire flooding and landslide hazards
- Sea-level rise adaptation projects lack identified funding

This is an **internal CEQA inconsistency**.

Many Plan Bay Area growth areas are projected to face tidal flooding, storm surge impacts,, overtopping of levees, or sea-level rise impacts by 2050 and 2100. The EIR repeatedly cites future coordination with other agencies but fails to identify funding, timelines, feasibility, or enforcement mechanisms

This is explicit **mitigation deferral**, prohibited under CEQA unless performance standards and mechanisms for enforcement are established.

Examples of analytical shortcomings:

- No identification of **funding sources** for shoreline protection.
- No requirement that local jurisdictions demonstrate **financial capacity** to construct levees or sea walls.
- No requirement that growth areas demonstrate protection to **2050 flood levels before housing allocation.**

Requested Revisions

- Require **funded sea-level rise adaptation plans** before allocating major growth to shoreline PDAs.
- Add a **No-Net-Additional-Risk** standard for flood-prone areas unless specific protection measures are in place.
- Require **independent verification** that shoreline adaptation projects are feasible and funded.
- Analyze a **low-lying growth reduction alternative**, shifting growth out of areas requiring extensive shoreline engineering.
- Reevaluate hydrology impacts to reflect consistency with **PUF-3 and HAZ-7**.

Response I37-4

The comment considers two distinct CEQA issue areas that are addressed independently in the Draft EIR: (1) hydrology and water quality and (2) public utilities and facilities. Please refer to Response A3-9 regarding stated inconsistencies between the two sections in the Draft EIR.

Sea level rise adaptation projects are detailed in Section 2.2.2 in the Project Description and analyzed throughout Chapter 3 of the Draft EIR.

Please refer to "Mater Response 2: Mitigation Measures" for a discussion regarding deferred mitigation measures and funding mechanisms. Please refer to Response I15-1 regarding CEQA and economic impacts/funding and "Master Response 3: Plan Alternatives" for a discussion of a reasonable range of alternatives analyzed in the Draft EIR.

Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation because details related to the location, size, design, or setting of specific projects are unknown and therefore a meaningful evaluation could not occur at this time.

Comment I37-5

4. Biological Resources — Fragmentation and Riparian Impacts Underestimated

The Draft EIR acknowledges potential impacts under:

- **BIO-1**: sensitive habitat impacts
- **BIO-2**: special-status species
- **BIO-3**: riparian/wetland impacts
- **BIO-4**: wildlife movement and habitat connectivity

Yet mitigation relies almost exclusively on existing regulatory frameworks and local implementation of best practices.

Problems include:

- No region-wide habitat connectivity plan
- No required mitigation ratios for habitat loss

No coordinated riparian buffer standards

- No regional constraint on infrastructure extension that fragments habitat

Mitigation relies on:

- Existing regulatory frameworks,
- Generalized best practices, and
- Local discretion.

This is insufficient because Plan Bay Area 2050+ does not address cumulative habitat loss from decades of infill and redevelopment.

Requested Revisions

- Add a **regional habitat-connectivity overlay** restricting new growth in wildlife corridors.
- Require **no-net-loss standards** for riparian and wetland habitats.
- Include regionally consistent **buffer requirements** for riparian zones.
- Require riparian buffer zones and wildlife-safe design standards.

Response I37-5

See response to comment O12-27 regarding the no net loss policy addressed in the Draft EIR and required mitigation ratios.

The environmental setting in the Draft EIR (specifically, pages 3.5-22 and 3.5-23) and Figure 3.5-5, describe and display regional habitat connectivity data from Conservation Lands Network, which is a recent regional habitat connectivity mapping effort. Mitigation Measure BIO-3(a) on pages 3.5-54 to 3.5-55 describes the requirements for projects to reduce impacts on wildlife movement. These requirements include assessing the project location in relation to mapped critical linkages, and implementation of several measures to reduce impacts on wildlife movement, including wildlife-friendly design standards (e.g., for culverts, overpasses, and fences). Mitigation Measure BIO-2 on pages 3.5-48 through 3.5-51 of the Draft EIR requires projects to avoid impacts on riparian habitat or compensate for impacts that cannot be avoided. Determination of protective avoidance buffer sizes is more appropriate at the project level, where details including the vegetation communities present in the riparian habitat, the quality of the riparian habitat, and local regulations can be considered. Please refer to “Master Response 4: Program Level Document” regarding the level of detail included in the Draft EIR.

Comment I37-6

5. Hazardous Materials & Brownfield Redevelopment — Vapor Intrusion Risks Under-Analyzed

Adding 1.8 million residents (per PBA forecast), or even lower amounts (DOF-based), will significantly increase demand for:

- **Landfill capacity,**
- **Hazardous waste disposal,**
- **Construction and demolition debris processing.**

The EIR assumes local compliance with state recycling laws is sufficient. However:

- Several Bay Area landfills are nearing closure within the Plan horizon.
- The EIR provides **no regional capacity analysis** for construction and demolition (C&D) waste from infill redevelopment.
- There is no analysis of hazardous materials from expansion of industrial PDAs.

Under **Impact HAZ-4 and HAZ-5**, the EIR notes potential exposure to hazardous materials during redevelopment but treats mitigation as if existing regulations alone are sufficient.

Missing elements include:

- Vapor intrusion analyses for infill sites
- Remediation timing and sequencing
- Worker health & safety controls
- Cumulative exposure impacts for EJ communities already burdened by toxics

Requested Revisions

- Require Phase I/Phase II assessments for all infill development in older industrial PDAs.
- Include detailed vapor-intrusion mitigation requirements.
- Add cumulative toxic exposure analysis for EJ communities receiving disproportionate infill redevelopment.
- Require a regional **solid-waste and C&D capacity strategy**.
- Add mitigation requiring local compliance with enhanced recycling and waste-diversion performance metrics.
- Analyze hazardous-material storage impacts in industrial PDAs.

Response I37-6

The proposed plan is a long-range regional planning document, and the EIR includes a program-level assessment of potential impacts related to hazardous materials and utilities (e.g., landfill capacity). Please also refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. Impact HAZ-4 evaluates the proposed plan's potential to create a significant hazard to the public or the environment due to locating on a hazardous material site (pages 3.9-36 through 3.9-39). Specific sites of documented contamination are not evaluated in this analysis because it is a program-level document. For this reason, the analysis of Impact HAZ-4 concludes the impact would be potentially significant. Mitigation Measure HAZ-4 addresses this impact. Mitigation Measure HAZ-4 would require Phase I Environmental Site Assessment (ESA) and Phase II ESA. The Phase I/II ESA process would adequately mitigate the potential for future development to create a significant hazard to the public or the environment because it is located on a site that is included on a list of hazardous materials sites. If chemical vapors from contaminated soil or groundwater are identified during the Phase I/II ESA process, measures to mitigate vapor impacts and protect workers and the public would be identified. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact

would be significant and unavoidable for purposes of this program-level review. The programmatic analysis provided in the Draft EIR is adequate and appropriate under CEQA.

Impact HAZ-5 evaluates the proposed plan's potential to result in a safety hazard for people residing or working in the planning area for projects located within an airport land use plan or within 2 miles of a public airport or public use airport (pages 3.9-39 through 3.9-41). Because there are existing federal, State, and local regulations and oversight in place that would effectively reduce the inherent hazard associated with development near airports to an acceptable level, the impact would be less than significant.

With respect to landfill capacity, solid waste facilities and their capacities in the Bay Area are discussed on pages 3.14-16 through 3.14-19 of the Draft EIR. Specifically, the active Bay Area landfills and their remaining capacities are presented in Table 3.14-5 of the Draft EIR. Impact PUF-4 (Draft EIR pages 3.14-47 through 3.14-50) addresses impact related to solid waste and capacity of local infrastructure, which considers the capacity of the active Bay Area landfill facilities to accommodate construction (including demolition) and operation solid waste resulting from implementation of the proposed plan. Mitigation Measure PUF-4 would reduce impact associated with solid waste generation. However, it is unknown that the impact would be reduced to a less-than-significant level. Therefore, the impact is considered significant and unavoidable.

Priority Development Areas (PDAs) are defined on page 2-33 of the Draft EIR as follows:

> **Priority Development Areas (PDAs)**— Places nominated by local governments served by transit and planned for new homes and jobs at densities necessary to support effective transit service. All PDAs are supported by a resolution by the local government and approved by the ABAG Executive Board. (See ABAG Resolution 02- 2019 for detailed criteria).

PDAs are nominated by local governments served by transit and planned for new homes and jobs at densities necessary to support effective transit service. . The proposed plan does not include expansion of industrial PDAs as claimed in the comment.

Comment I37-7
Conclusion

The Draft EIR exhibits significant analytical gaps, unsupported assumptions, and deferred or unenforceable mitigation measures across multiple environmental topics. These issues—particularly regarding **air quality, flooding, seismic safety, environmental justice, and solid waste capacity**—must be addressed to ensure CEQA compliance and to protect Bay Area residents.

To comply with CEQA, the Final EIR must:

- Provide enforceable, performance-based mitigation
- Correct internal inconsistencies (particularly HYDRO vs. PUF conflicts)
- Add hazard-avoiding and EJ-enhancing alternatives
- Explicitly acknowledge where impacts remain **Significant and Unavoidable (SU)**

Thank you for considering these comments.

Response I37-7

Please refer to Responses I37-1 through I37-6. There are no formal requirements or procedures to evaluate potential environmental justice impacts under CEQA because environmental justice is not an impact to the natural or physical environment.

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding deferred mitigation measures and significant and unavoidable impact determinations in the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I38 Liang Chao 5

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I38-1

We submit the following focused comments on **wildfire risk, emergency evacuation, cumulative hazards, and mitigation deficiencies** in the Draft Plan Bay Area 2050+ and Draft Environmental Impact Report (Draft EIR). These issues warrant special attention because the Draft EIR repeatedly finds these impacts to be **Significant and Unavoidable,** and because the mitigation program relies on **voluntary, non-enforceable, and deferred** actions that do not satisfy CEQA requirements.

Response I38-1

Please refer to "Master Response 2: EIR Mitigation Measures," for a discussion regarding deferred mitigation measures and significant and unavoidable impact determination. Please refer to Responses I38-2 through I38-29.

Comment I38-2

Executive Summary of Key Concerns

- **Wildfire Risk Remains Significant and Unavoidable (Impact HAZ-7):**
  The Draft EIR finds that projected development patterns and new infrastructure corridors will increase exposure to wildfire hazards, and that mitigation cannot reduce this impact to a less-than-significant level.

- **Evacuation Performance Will Degrade (Impact HAZ-6):**
  Concentrating additional population and employment in constrained evacuation corridors will increase evacuation times and degrade emergency response capacity, remaining Significant and Unavoidable even after mitigation.

- **Cumulative Wildfire Hazards Are Also Significant and Unavoidable (CUM-8):**
  The EIR acknowledges that wildfire hazards operate at a regional scale, and that Plan-induced growth contributes substantially to cumulative regional risk.

- **Growth Geographies Do Not Eliminate Hazard Exposure:**
  Although the Draft Plan avoids mapped "very high hazard" zones, development and infrastructure will still occur adjacent to WUI areas, increasing evacuation and ignition risks.

- **Mitigation Measures Are Voluntary and Non-Enforceable**:
  Mitigation Measures HAZ-6, HAZ-7, HAZ-8, and CUM-8 rely on local discretion, "where feasible"

language, and deferred planning actions, resulting in no enforceable regional performance standards.

- **No Wildfire-Safe Growth Alternative Is Provided:**
  CEQA requires meaningful alternatives. The Draft EIR fails to evaluate any alternative that significantly reduces growth near WUI areas or minimizes evacuation-corridor strain.

- **Climate Change Will Intensify Risks, Yet the Plan Does Not Incorporate Climate-Driven Hazard Modeling:**
  The Draft EIR acknowledges more frequent extreme weather, more severe wildfire behavior, and increased smoke events, but none of these are integrated into Growth Geography modeling or mitigation commitments.

Given the Draft EIR's own findings and the severity of regional wildfire and evacuation constraints, Plan Bay Area 2050+ must incorporate **enforceable performance standards**, stronger mitigation, and alternatives that meaningfully reduce hazard exposure.

Response I38-2

The comment provides a summary of detailed comments provided below. Please refer to Response I3-3 through Response I38-11.

Comment I38-3

1. The Draft EIR Finds Significant and Unavoidable Wildfire and Evacuation Impacts

The Draft EIR concludes that wildfire-related impacts will remain **Significant and Unavoidable** even after implementation of mitigation measures.

A. Impact HAZ-7 — Wildfire Risk (Significant and Unavoidable)

The EIR states that buildout of the Draft Plan will:

- increase exposure of people and structures to wildfire hazards,
- place new development in proximity to very high and high Fire Hazard Severity Zones (FHSZ),
- introduce new infrastructure corridors through wildland-urban interface (WUI) areas, and
- increase the likelihood of ignition, pollutant release, and post-fire landslide/flooding hazards.

Even with Mitigation Measure HAZ-7, the Draft EIR concludes this impact remains **Significant and Unavoidable.**

B. Impact HAZ-6 — Emergency Response and Evacuation (Significant and Unavoidable)

The EIR explicitly states that increased population and employment under the Draft Plan:

- will increase congestion on evacuation routes,
- will lengthen emergency response times,
- may impede evacuation during wildfire or other emergencies, and
- will worsen these impacts compared to the No Project Alternative.

Impact HAZ-6 remains **Significant and Unavoidable** despite Mitigation Measure HAZ-6.

C. Cumulative Impact CUM-8 — Regional Wildfire Hazard (Significant and Unavoidable)

The EIR acknowledges wildfire hazards are regional, not local, and that growth under the Plan contributes to cumulative exposure.

CUM-8 concludes that cumulative wildfire and evacuation impacts are **Significant and Unavoidable**, even with mitigation.

These SU findings are among the most serious in the entire Draft EIR.

Response I38-3
The comment provides a summary of the conclusions of Impacts HAZ-7, HAZ-6, and CUM-8. However, the comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding the significant and unavoidable impact determination. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I38-4
2. The Draft Plan's Growth Geographies Suggest Safety, but the EIR Confirms Risks Remain

The Draft Plan states that Priority Development Areas (PDAs) and Transit-Rich Areas (TRAs) were chosen to **avoid high-risk zones**, and that "Growth Geographies exclude very high and high Fire Hazard Severity Areas."

However, the Draft EIR contradicts the perception that wildfire risks have been "designed out" of the Plan.

The EIR states clearly that under the Draft Plan:

- development **may still occur adjacent to** very high hazard zones;
- infrastructure (roads, utilities, transit corridors) **will be extended through** WUI areas;
- growth will increase the number of people requiring evacuation;
- evacuation times **will increase**, even if development is technically "outside" mapped FHSZs.

CEQA requires a realistic assessment of hazard exposure—not optimistic mapping boundaries that do not account for ember cast, smoke, infrastructure co-location, or emergency access limitations.

Response I38-4
Please refer to Response I35-4 for a discussion regarding the land use growth footprint within fire hazards zones.

CEQA does not require evaluation of evacuation time. The Draft EIR does not state that "evacuation times will increase, even if development is technically 'outside' mapped FHSZs." Rather, the Draft EIR evaluates whether implementation of the proposed plan would impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. Please refer to Impact HAZ-6 of the Draft EIR (pages 3.9-41 through 3.9-45) for a discussion regarding interference with emergency response plan or emergency evacuation plan.

The comment related to the optimistic mapping boundaries is an opinion of the proposed plan's land use growth, sea level rise adaptation projects, and transportation project footprints delineation. It does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I38-5

3. The Mitigation Program Is Largely Aspirational and Relies on Voluntary Local Action

The mitigation measures offered for wildfire and evacuation (HAZ-6, HAZ-7, HAZ-8, CUM-8) demonstrate significant deficiencies that render them noncompliant with CEQA's enforceability requirements.

A. Mitigation measures rely on voluntary local implementation

The Draft EIR repeatedly states that:

- MTC/ABAG cannot require local jurisdictions to impose wildfire mitigation requirements,
- local adoption of wildfire-hardening, defensible space, or fuel management standards is optional, and
- significance remains SU if local jurisdictions decline to implement the measures.

This violates the CEQA requirement that mitigation measures must be **feasible, enforceable, and not indefinitely deferred.**

Response I38-5

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding CEQA requirements for mitigation measures and deferred mitigation.

Comment I38-6

B. Mitigation consists of "where feasible" guidance, not enforceable standards

For example, Mitigation Measure HAZ-7 includes:

- public education,
- information sharing,
- promotion of defensible space,
- fuel management "where feasible,"
- local adoption of Title 14 standards "when applicable."

These are not performance-based mitigation commitments.

Response I38-6

Please refer to "Master Response 2: EIR Mitigation Measures" regarding the use of "feasible" in mitigation measures.

The first bullet of Mitigation Measure HAZ-7 states that "Ensure that development of areas mapped by CAL FIRE as high and very high fire hazard severity zones complies with Title 14 of the California Code of

Regulations minimum wildfire protection standards." It requires complying with Title 14 of the California Code of Regulations when development occurs in areas mapped as high and very high fire hazards severity zones if Mitigation Measures HAZ-7 is adopted. Title 14 minimum wildfire protection standards are performance standards.

The sixth bullet of Mitigation Measure HAZ-7 states that "Implementing agencies shall develop a regulatory mechanism for permitting an aggressive hazardous fuels management program." This measure requires developing regulatory mechanism for permitting fuels management program. The text "where feasible" is not part of the measure. The implementing agency would be required to implement this measure or equally effective measure if Mitigation Measures HAZ-7 is adopted.

The seventh bullet of Mitigation Measure HAZ-7 states that "Implementing agencies shall establish standards for fuel breaks that can slow or stop a wildfire advancing into a community or into the wildlands. Fuel breaks shall be strategically located to protect a community, structures, or routes of access and egress. Strategic locations may include ridgelines, greenbelts, or other locations to manage embers or support community-level fire suppression tactics." This measure requires establishing standards for fuel breaks and identifies specific fuel break location to slow or stop wildfire. This is a requirement with performance standards (e.g., standards for fuel breaks to slow or stop wildfire and strategic locations) not a promotion if the implementing agency adopts Mitigation Measure HAZ-7.

Comment I38-7

C. No regional wildfire performance standards are provided

The EIR contains **no measurable performance criteria**, such as

- maximum population-to-evacuation-route vehicle ratios;
- required secondary evacuation routes for PDAs near WUI;
- minimum fire-flow requirements tied to density increases;
- maximum emergency response times;
- required roadway widths or shoulder requirements.

Without performance standards, CEQA mitigation becomes impossible to enforce or evaluate.

Response I38-7

The proposed plan covers nine counties and 101 cities in the Bay Area. Many of the future projects would occur on land under the control of local lead agencies (not MTC or ABAG). Therefore, regional performance standards would not be feasible for wildfire mitigation. In addition, the programmatic analysis in the Draft EIR does not allow for a precise description of the details of mitigation, because details related to the location, size, design, or setting of specific projects are unknown. Instead, the EIR discloses a menu of potential mitigation measures that could be applied at the project-level; however, MTC acknowledges that application of such measures would be the responsibility of the lead agency conducting environmental review under CEQA. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion of the CEQA-compliant mitigation measures identified in the Draft EIR.

Comment I38-8

D. Mitigation is deferred to future local plans

The EIR repeatedly states that mitigation will occur:

- "as part of local planning processes,"
- "as jurisdictions update their LHMPs,"
- "when local plans are next amended,"
- or "through existing local programs."

This is classic CEQA-deficient mitigation deferral.

Response I38-8
Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion of the CEQA-compliant mitigation measures identified in the Draft EIR.

Comment I38-9
4. The Draft Plan Increases Population in Areas With Constrained Evacuation Capacity

Many Growth Geographies—including TRAs, PDAs, and High-Resource Areas—are located within or adjacent to constrained evacuation corridors.

The Draft EIR acknowledges:

- roadway bottlenecks will worsen,
- increased congestion will elevate evacuation times,
- emergency response capacity will degrade,
- under the No Project Alternative, evacuation would be **less severe**.

This is a critical finding: concentrating growth may reduce per-capita VMT but can **worsen evacuation safety**, a factor the Plan and EIR do not reconcile.

Response I38-9
The Draft EIR concludes that the impact related to interference with an adopted emergency response plan or evacuation plan would be significant and unavoidable under the proposed plan, and the impact under the No Project Alternative would be less than those that would occur under the proposed plan. The daily per capita VMT under the proposed plan would be less than under the No Project Alternative. The analysis in the Draft EIR complies with MTC and ABAG's obligation to disclose potential impacts associated with the proposed plan. EIRs are required to consider alternatives to the project that are capable of reducing or avoiding significant environmental impacts. Please refer to "Master Response 3: Plan Alternatives" for a discussion of the reasonable range of alternatives included in the EIR.

Comment I38-10
5. The No Project Alternative Performs Better for Evacuation Safety

The Draft EIR states that:

- Under the No Project Alternative, development is more dispersed,
- congestion is spread out across the network,
- evacuation constraints are **lessened** compared to the proposed Plan.

This admission undermines the Draft Plan's claim that concentrating growth automatically improves public safety.

Response I38-10
Thank you for your comment. The comment includes statements from the Draft EIR and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I38-11
6. Climate Change Intensifies All Wildfire and Evacuation Hazards

The Draft EIR (Chapter 3.6, Climate Change) recognizes that:

- climate change will increase wildfire frequency and severity,
- extreme weather will strain emergency response systems,
- smoke events will impact vulnerable populations regardless of FHSZ boundaries.

Yet none of these factors are incorporated into the wildfire-risk modeling for Growth Geographies, nor into mitigation requirements.

Response I38-11
The comment provides an opinion regarding the Growth Geographies and mitigation requirements. As a program level document wildfire-risk modeling was not prepared for the plan area. Please refer to "Master Response 4: Program Level Document" regarding the level of analysis prepared for the Draft EIR. The programmatic analysis in the Draft EIR does not allow for a precise description of the details of project-specific impacts or mitigation because details related to the location, size, design, or setting of specific projects are unknown and therefore meaningful wildfire risk modeling could not occur at this time. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion of CEQA requirements for mitigation measures. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I38-12
7. Recommendations for Plan and EIR Revisions

To ensure wildfire and evacuation hazards are addressed to the extent feasible, the Final Plan Bay Area 2050+ and Final EIR should:

A. Adopt Regional Wildfire and Evacuation Performance Standards

Examples include:

- Minimum evacuation-route capacities
- Maximum population or housing units per evacuation corridor
- Required secondary evacuation routes
- Required local adoption of WUI codes as a condition of funding or consistency findings
- Maximum emergency response times for Growth Geographies

Response I38-12
The Draft EIR evaluates wildfire and evacuation-related hazards at a programmatic level, consistent with CEQA requirements for a regional plan. Because the proposed plan does not include project-level design details or jurisdiction-specific development approvals, the program-level analysis does not establish corridor-specific evacuation capacity standards, enforce local code adoption, or set jurisdiction-level emergency response performance requirements. The commenter's recommendations for performance standards and conditional funding requirements are noted and will be considered by the MTC Commission and ABAG Executive Board as part of their overall consideration of the proposed plan. Please refer also to Responses I38-16 and I38-25 and "Master Response 2: EIR Mitigation Measures."

Comment I38-13
B. Tie MTC funding to wildfire and evacuation safety benchmarks

- MTC has authority to condition:
- One Bay Area Grant (OBAG) funding
- Transit/housing integration funds
- Priority Development Area support funds
- Transportation funding allocations

on measurable wildfire and evacuation performance criteria.

Response I38-13
The Draft EIR evaluates the potential environmental impacts associated with implementation of the proposed plan at a regional, programmatic level. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources" regarding plan funding. Accordingly, CEQA does not require MTC to tie funding to wildfire and evacuation safety benchmarks. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding funding mechanisms for mitigation.

Comment I38-14
C. Strengthen Mitigation Measures HAZ-6, HAZ-7, HAZ-8

- Remove "where feasible" language
- Replace voluntary measures with specific required actions
- Require defensible space, building hardening, and fuel reduction standards for any Growth Geography within one mile of a mapped FHSZ
- Require emergency-services capacity analysis before directing growth to a location

Response I38-14
Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding CEQA requirements of mitigation measures. Mitigation Measures HAZ-6 through HAZ-8 meet the requirements for mitigation under CEQA as described in Master Response 2 and no changes to the mitigation have been made.

Comment I38-15

D. Provide a Growth Alternative that Reduces Exposure to Wildfire Hazards

The Draft EIR fails to evaluate:

- an alternative that reduces growth in WUI-adjacent corridors, or
- an alternative that prioritizes infill in areas with strong evacuation capacity.

This violates CEQA's requirement for meaningful alternatives.

Response I38-15

Please refer to "Master Response 3: Plan Alternatives" for a discussion of the reasonable range of alternatives included in the Draft EIR. The Draft EIR meets the CEQA requirements for alternatives as included in Master Response 3.

Comment I38-16

E. Update the modeling methodology

The Plan should use:

- scenario-based wildfire propagation modeling,
- ember-cast modeling,
- corridor-level evacuation time analyses,
- high-resolution climate hazard projections.

Response I38-16

Please refer to Response I38-12. The Draft EIR's wildfire and evacuation analysis is conducted at a programmatic level appropriate for a regional RTP/SCS and uses available regional-scale datasets, mapping tools, and hazard characterization methods. The commenter's recommendations regarding advanced modeling tools and higher-resolution hazard projections are noted and will be considered as part of ongoing technical work and future Plan Bay Area updates as tools, data availability, and regional modeling capacity evolve over time. Refer to "Master Response 8: Revisions to Plan Strategies, Project Lists, and Implementation Priorities."

Comment I38-17

F. Clarify that wildfire safety must be integrated into RHNA, PDA expansions, and local planning expectations

Local governments cannot be expected to absorb growth that exceeds their evacuation or fire-response capacity.

Response I38-17

Please refer to Response I38-12. Growth patterns reflected in the plan are used for planning and analytical purposes and do not constitute enforceable mandates for local development approvals. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I38-18

9. Recommendations and Requests

To ensure the Final Plan Bay Area 2050+ and Final EIR meet CEQA requirements and adequately address wildfire and evacuation risks, we respectfully request the following revisions:

A. Adopt Regional, Enforceable Wildfire and Evacuation Performance Standards

The Final EIR must include measurable, enforceable performance criteria that jurisdictions must meet before accommodating significant growth in hazard-prone areas. Examples include:

- Maximum population or unit counts per evacuation corridor
- Minimum evacuation-route capacity (vehicles per lane per hour)
- Secondary evacuation route requirements for all PDAs within one mile of a mapped Fire Hazard Severity Zone
- Maximum emergency response times for Growth Geographies
- Required water, pressure, and fire-flow capacity tied to increased density

These criteria must be conditions for:

- designating or expanding PDAs and TRAs,
- receiving OBAG or regional transportation/housing funds,
- establishing Growth Geography compliance, and
- certifying consistency with the Plan.

Response I38-18

Please refer to Response I38-7 for a discussion regarding regional performance standards and refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding the CEQA-compliant mitigation measures.

Comment I38-19

B. Strengthen Mitigation Measures HAZ-6, HAZ-7, HAZ-8, and CUM-8

Mitigation measures must be revised to:

- remove "where feasible" and other discretionary wording,
- explicitly require wildfire-hardening codes for new development,
- require defensible space enforcement and vegetation management for any growth adjacent to WUI,
- require local adoption of updated Title 14/PRC 4290 (fire safe regulations) for areas receiving growth
- allocations,
- specify timelines, implementation responsibilities, and measurable outcomes.

Mitigation cannot remain voluntary, advisory, or dependent on future local general plan updates.

Response I38-19
Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding the CEQA-compliant mitigation measures. Mitigation Measures HAZ-6 through HAZ-8 and CUM-8 meet the requirements for mitigation under CEQA as described in Master Response 2 and not changes to the mitigation have been made.

Comment I38-20
C. Condition MTC/ABAG Funding on Wildfire and Evacuation Readiness

MTC possesses a powerful tool for ensuring regional safety: **funding allocation authority**. The Final EIR should commit to conditioning allocations of:

- OBAG funds
- Transit-oriented development funds
- Priority Development Area support grants
- Regional transportation investments

on demonstrated wildfire and evacuation readiness.

Examples of required conditions:

- adoption of local WUI codes
- proven evacuation-route capacity
- completed community evacuation plans
- emergency access improvements
- fire-flow infrastructure upgrades

Funding conditions ensure that mitigation is **implemented**, not merely recommended.

Response I38-20
Please refer to Response I38-13. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding funding mechanism of mitigation measures.

Comment I38-21
D. Provide a CEQA-Compliant Wildfire-Safe Reduced Exposure Alternative

The Draft EIR does **not** analyze any alternative that:

- shifts growth away from high-risk corridors,
- reduces population allocated to evacuation-constrained TRAs/PDAs,
- minimizes expansion of infrastructure through WUI areas, or
- avoids concentrating residents where emergency access is limited.

A lawful Reduced Exposure Alternative should include:

- lower growth near mapped WUI risk bands (within 1–2 miles),
- prioritization of infill in flat, low-hazard areas,
- redistribution of growth to areas with strong evacuation capacity,
- elimination or reduction of planned infrastructure expansions through high-hazard zones.

This alternative is required under CEQA for meaningful comparison.

Response I38-21

Section 4.5.9 of the Draft EIR compares the hazards and wildfire impacts of the proposed plan to the three alternatives. Table 4-29 on page 4-50 of the Draft EIR includes a summary of the acreage of proposed plan and alternatives in fire hazard severity zones. As discussed in Section 4.5.9, Alternatives 1 and 2 would result in less wildfire impact than those that would occur under the proposed plan because a smaller transportation projects footprint and land use growth footprint would occur within higher risk fire areas, respectively. However, because of the area of development in a high-risk fire zone, this impact under Alternative 1 and 2 would be significant and unavoidable for the reasons described under Impact HAZ-7. Please refer to "Master Response 3: Plan Alternatives" for a discussion regarding the reasonable range of alternatives included in the Draft EIR. The Draft EIR meets the CEQA requirements for alternatives as included in Master Response 3.

Comment I38-22

E. Incorporate Climate-Change Projections into Growth and Hazard Modeling

The EIR acknowledges that:

- wildfire seasons are lengthening,
- ember-cast distances are increasing,
- vegetation fuel loads are shifting,
- heat extremes will strain emergency response systems.

However, none of these factors are used to:

- model hazard exposure for Growth Geographies,
- evaluate evacuation scenarios, or
- shape mitigation triggers.

The Final EIR must incorporate climate-adjusted hazard projections from:

- CAL FIRE Fire Hazard Severity Zone updates,
- UC wildfire modeling studies,
- the State's Fourth Climate Assessment,
- region-specific pyrogeographic modeling studies.

Response I38-22
The comment provides an opinion regarding the Growth Geographies and evacuation hazard modeling but does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion of CEQA requirements for mitigation measures.

Comment I38-23
F. Prohibit or Limit Infrastructure Extensions Through WUI Areas Unless Safety Standards Are Met

Infrastructure expansion into, or through, WUI areas:

- increases ignition risk,
- brings more people into hazard zones,
- requires more emergency response resources,
- extends evacuation distances.

The Plan should require that **no new transportation or utility infrastructure** be extended into or through WUI zones unless:

- evacuation capacity is increased proportionally,
- ignition reduction measures are built into the project,
- emergency access improvements are funded and implemented.

Response I38-23
Please refer to Response I38-12. Plan Bay Area 2050+ is a long-range regional plan that identifies planning-level strategies and investments; it does not approve specific transportation or utility projects, authorize infrastructure extensions, or make project-level findings regarding evacuation capacity or ignition reduction design measures. Project sponsors would evaluate specific infrastructure proposals through separate project development processes, including project-level CEQA review where required. The commenter's policy recommendations are noted and will be considered by the MTC Commission and ABAG Executive Board in their consideration of plan strategies and implementation actions related to wildfire resilience. Please refer also to Response I38-25.

Comment I38-24
G. Require Local Wildfire and Evacuation Readiness Before Approving Growth Allocations

Before assigning growth to a PDA or TRA, the Plan should require:

- an evacuation analysis,
- emergency response capacity assessment,
- fire-flow infrastructure review,
- assessment of secondary access routes,
- demonstration of compliance with updated WUI regulations.

This requirement would prevent placing new population in evacuation bottlenecks.

Response I38-24

Please refer to Response I38-12. Plan Bay Area 2050+ identifies broad growth geographies and strategies for planning and analytical purposes, but does not allocate development entitlements, does not require jurisdictions to approve development, and does not substitute for local hazard planning, evacuation planning, and emergency service planning. Local jurisdictions retain land use authority and responsibility for ensuring that future development proposals comply with applicable health and safety requirements and hazard-related regulations. The commenter's recommendations regarding readiness prerequisites are noted and will be considered by the MTC Commission and ABAG Executive Board as part of their overall consideration of the proposed plan. Please refer also to Response I38-26.

Comment I38-25

H. Clarify That Cities Cannot Be Required to Accommodate Growth That Exceeds Their Evacuation Capacity

Every city has a legal and ethical obligation to protect residents' safety.
The Final Plan must clearly state:

- Cities will not be penalized or deemed "inconsistent" if they cannot accommodate growth that exceeds their evacuation capacity, emergency access, or fire-flow infrastructure.

This clarification is necessary because wildfire and emergency access are life-safety issues, not discretionary planning considerations.

Response I38-25

Please refer to Response I38-24. Plan Bay Area 2050+ does not override local land use authority or require jurisdictions to approve development that would conflict with local health and safety responsibilities or hazard constraints. Growth patterns reflected in the plan are used for planning and analytical purposes and do not constitute enforceable mandates for local development approvals. Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" for additional information. The commenter's request for additional clarification regarding local hazard constraints and implementation expectations is noted and will be considered by the MTC Commission and ABAG Executive Board as part of their overall consideration of the proposed plan.

Comment I38-26

8. Conclusion

Wildfire safety and emergency evacuation are not optional planning considerations—they are fundamental lifesafety obligations. The Draft EIR correctly acknowledges that wildfire exposure (HAZ-7), emergency evacuation constraints (HAZ-6), and cumulative wildfire hazards (CUM-8) will remain **Significant and Unavoidable**, even after the mitigation measures proposed. However, the Draft Plan's reliance on voluntary, unenforceable, and deferred mitigation—combined with the concentration of population in evacuation constrained corridors—will leave many communities more vulnerable than they are today.

Response I38-26

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding CEQA-compliant mitigation measures and significant and unavoidable impact determination.

Comment I38-27

The purpose of CEQA is to ensure that environmental risks are fully disclosed and mitigated to the maximum feasible extent. A mitigation program that depends on future discretionary local actions, uses "where feasible" language, and lacks enforceable performance standards does not meet CEQA's requirements. Nor does an EIR that fails to examine a wildfire-safe alternative that meaningfully reduces exposure in the Wildland–Urban Interface.

Response I38-27

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion of the CEQA-compliant mitigation measures identified in the Draft EIR. Please refer to Response I38-21 regarding the request for a wildfire safe alternative.

Comment I38-28

For these reasons, we respectfully request that MTC and ABAG revise both the Draft Plan Bay Area 2050+ and the Draft EIR before certification and adoption. Specifically, the Final Plan and Final EIR must:

- incorporate **enforceable, measurable performance standards** for wildfire and evacuation safety;
- condition regional funding and Growth Geography designations on meeting those standards;
- strengthen Mitigation Measures HAZ-6, HAZ-7, HAZ-8, and CUM-8 so they are not voluntary or deferred;
- provide a CEQA-compliant **Reduced Exposure Wildfire-Safe Alternative**; and
- ensure that growth allocations do not exceed local emergency response and evacuation capacity.

A regional plan must not place residents, first responders, or infrastructure at heightened wildfire risk. These revisions are essential to ensure that Plan Bay Area 2050+ protects public safety, complies with CEQA, and provides a realistic and responsible path for the region's future.

Response I38-28

Please refer to Responses I38-2 through I38-28.

Comment I38-29

We appreciate your consideration of these comments and would welcome the opportunity to discuss these issues further.

Response I38-29

These conclusionary remarks are acknowledged for the record.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I39 Brian Swanson 2

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I39-1

I am a resident, voter, and taxpayer of the City of San Ramon and Contra Costa County, and a certified planner specializing in transportation impact analysis. I submit this comment in opposition to certification of the Draft Environmental Impact Report (Draft EIR or "DEIR") for Draft Plan Bay Area 2050+ ("Draft Plan") as currently prepared.

Response I39-1

Thank you for your comment. The comment is introductory and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I39-2

My opposition is based on the DEIR's structural forecast risk and the downstream legal, fiscal, operational, and environmental exposure the Draft Plan and DEIR transfer to local jurisdictions and project sponsors—especially because Plan Bay Area 2050+ functions as the Bay Area's Regional Transportation Plan (RTP) and Sustainable Communities Strategy (SCS), and because local agencies routinely tier subsequent planning, capital programming, and California Environmental Quality Act (CEQA) analyses from these regional assumptions and regional impact conclusions.

Response I39-2

Thank you for your comment. The comment is introductory and does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I39-3

The DEIR contains important admissions and useful analysis; however, it remains severely inadequate as an informational document for CEQA purposes because it relies on a single primary growth forecast/control total without disclosing the range of reasonably foreseeable outcomes through high/medium/low growth-forecast envelopes and without presenting the resulting range of impacts across the full set of systems CEQA requires the DEIR to analyze (transportation/VMT, greenhouse gases, air quality, energy, utilities, public services/facilities, and related topics).

Response I39-3

The commenter is correct that the Draft EIR relies on a single growth forecast as the "project" analyzed in the Draft EIR. State CEQA Guidelines Section 15378 requires a lead agency analyze a project, which is the whole of an action that has potential for resulting in either a direct or physical change to the environment, or a reasonably foreseeable indirect physical change to the environment. For the purposes of this EIR the "project" is defined as the proposed plan and the growth forecast associated with the proposed plan. CEQA does not require lead agencies to analyze a range of outcomes that could become the project, but actually requires that the lead agency adopt a stable description of the project that will not substantially vary. Any future changes in the project as defined by CEQA would require additional CEQA analysis at a later date. Although CEQA requires an alternatives analysis for an EIR, the lead agency (MTC and ABAG) have the discretion to choose the reasonable range of alternatives to be analyzed in the EIR. Please refer to "Master Response 3: Plan Alternatives." Impacts from the proposed plan related to transportation, greenhouse gas emissions, air quality, energy, utilities, public services, and facilities are analyzed throughout Chapter 3 of the Draft EIR. The Draft EIR meets the requirements of CEQA and no revisions are required.

Comment I39-4

1. Forecast bias + single-forecast planning undermines CEQA disclosure and shifts intolerable downstream risk to locals

1.1. The DEIR admits a major baseline miss, yet states the methodology/assumptions were retained

The DEIR explicitly acknowledges that the Bay Area's 2020 population baseline was nearly 200,000 people lower than previously projected and then explicitly states the underlying methodology and assumptions were kept intact. This is a critical admission because it confirms the same modeling structure persists even after a material baseline error. [DEIR, Ch. 2 (Project Description), p. 2-29 (PDF p. 137)]

From a CEQA standpoint, this admission triggers a duty to disclose forecast uncertainty as a driver of impact uncertainty. If the DEIR acknowledges a material baseline miss and continuity of methods, it is not defensible to present one set of control totals as the single operative future without also disclosing a high/medium/low envelope and the range of impacts that follow from those different futures.

This is the core Forecast Bias and single-forecast planning deficiency: a single forecast path is being used to support region-shaping decisions, while the DEIR itself concedes the baseline volatility and methodological continuity that make single-path disclosure unreliable for decision-makers and the public.

Response I39-4

As explained in "Master Response 1: Regional Growth Forecast", Plan Bay Area 2050+ remained the adopted forecast methodology from the previous plan, while updated input data to reflect most recent trends. This resulted in a reduced long-term outlook relative to Plan Bay Area 2050, including a decrease of approximately 750,000 people and 250,000 households by 2050. Please refer to Responses I29-13 and I39-3 regarding the request for a high, medium, and low range of impacts. Please also refer to "Master Response 4: Program Level Document" for a discussion of the level of certainty and detail required of environmental analysis in a program level environmental document.

Comment I39-5

1.2. The DEIR's own growth table shows why "jobs-led" anchor risk and overestimation risk remain material

Table 2-14 (Regional Growth Forecasts) [DEIR, Table 2-14, p. 2-29 (PDF p. 137)] states the Plan's forecast trajectory through 2050, including:

Population: 7,749,000 (2020) → 9,586,000 (2050)

Employment: 4,025,000 (2020) → 5,436,000 (2050)

Households: 2,798,000 (2020) → 3,796,000 (2050)

Those figures imply (and require the DEIR to transparently evaluate) a very large scale of growth and associated infrastructure/service demand:

Population increase: +1,837,000 (about +24%)

Employment increase: +1,411,000 (about +35%)

Household increase: +998,000 (about +36%)

When employment grows materially faster than population in the modeled control totals, it amplifies the risk that jobs totals are being used as an upstream anchor that can inflate downstream travel demand, VMT baselines, and investment rationales unless the model chain explicitly corrects for structural factors (including multiple jobholding, telework persistence, and the observed post-COVID reconfiguration of commute patterns). This is not merely a technical nuance; it becomes a CEQA adequacy issue because the DEIR's significance conclusions and mitigation feasibility are sensitive to these forecasts.

Response I39-5

As discussed in "Master Response 1: Regional Growth Forecast", the forecast is not "jobs-led", but leverages the REMI PI+ model to capture the dynamic relationship between demographic change and economic performance, including industry structure, productivity, competitiveness, export propensity, labor supply and demand, and related factors. The analysis also included assumptions on telework and post-COVID commute pattern changes, and adjustments for multiple jobholding. Please refer to Response I28-11 for more details on these assumptions. Please refer to Response I39-3 regarding the "project" analyzed in the Draft EIR as defined by CEQA.

Comment I39-6

1.3. The DEIR must analyze impacts under high/medium/low growth envelopes, not only one "primary" control total

Because this plan is an RTP/SCS with regionwide consequences—and because the DEIR's own text confirms the baseline volatility—the DEIR must present impacts under at least three plausible growth-forecast envelopes:

- High growth (upper-bound employment/population/households)
- Medium growth (central estimate)
- Low growth (conservative baseline consistent with slower growth conditions)

This is not optional "extra analysis." Without it, the DEIR fails to disclose the range of reasonably foreseeable environmental impacts, and it shifts unacceptable downstream risk to local governments and project sponsors who must tier from this DEIR.

This single-forecast framing is also directly connected to your other deficiencies:

- Fiscal Incompleteness (local agencies bear infrastructure/service burdens under uncertain growth)
- Service and Infrastructure Gaps (schools/health/utilities are sensitive to growth levels)
- Performance and Accountability Gaps (no triggers for course correction when forecasts are wrong)
- Top-Down Governance (locals inherit burdens without a feasibility framework)

Response I39-6

Please refer to Response I39-3 regarding the request to analyze a low, medium, and high growth forecast in the EIR as well as "Master Response 3: Plan Alternatives" for a discussion of alternatives chosen for analysis in the Draft EIR.

Comment I39-7

2. Transportation and VMT: SB 743 makes forecast error legally consequential at the local project level

The DEIR acknowledges SB 743's shift under CEQA from congestion/Level of Service to vehicle miles traveled (VMT) as the transportation impact metric of record. [DEIR, Sec. 3.15 (Transportation), p. 3.15-14 (PDF p. 708)]

Because SB 743 makes VMT central, forecast error is no longer a "planning sensitivity" issue—it becomes a CEQA evidentiary problem and a project-level litigation risk:

- If upstream growth inputs are inflated, the regional model can generate inflated VMT baselines.
- Inflated baselines can create misleading impressions that certain strategies "reduce VMT" when they are merely reducing VMT relative to an inflated counterfactual.
- Local projects that tier from these baselines can be exposed if CEQA findings rely on
- phantom VMT reductions that do not materialize in real-world behavior.

CEQA significance determinations are ultimately made using thresholds of significance established by lead agencies (often local jurisdictions). A regional DEIR that relies on a single growth forecast and a single modeled VMT pathway does not adequately support local agencies' threshold-based determinations, particularly in a post-COVID context where travel behavior uncertainty is material.

Required DEIR fix (transport/VMT): The DEIR must present high/medium/low forecast envelopes and show how VMT outcomes and VMT significance conclusions vary under each envelope—including sensitivity to telework, commute mode shifts, and realistic transit uptake assumptions.

Response I39-7

Please refer to Response I39-3 regarding the request to analyze a low, medium, and high growth forecast in the EIR as well as "Master Response 3: Plan Alternatives" for a discussion of alternatives chosen for analysis in the Draft EIR.

As disclosed in Section 3.15 "Transportation" of the Draft EIR (Impact TRA-2), the proposed plan's impact on VMT would be significant and unavoidable with the implementation of Mitigation Measures TRA-2(a) through TRA-2(c). Therefore, the Draft EIR does not understate significant impacts on VMT as additional forecast scenarios would not change the conclusion that VMT impacts would remain significant and unavoidable. Subsequent projects implemented under the proposed plan would be required to analyze VMT at the project level applying current data and locally adopted thresholds of significance, as applicable. Furthermore, overestimation of future VMT does not create inflated baselines for project level CEQA review of future development. Baselines must almost always be based on actual environmental conditions at the time that a Notice of Preparation is issued, rather than a projection from a plan level document. A baseline may only be based on a projected future condition if there is substantial evidence for using such a baseline (i.e., for some reason, analysis of impacts on present conditions would be misleading). Therefore, no changes to the Draft EIR are required in response to this comment.

Comment I39-8

3. Greenhouse gases, climate, and energy: the DEIR concedes key impacts remain Significant and Unavoidable, and that implementation is outside MTC/ABAG's enforceable control

The DEIR's climate/greenhouse gas/energy section contains a direct and important admission:

- "there is no assurance" the mitigation level would achieve the regional reductions needed to attain statewide targets;
- MTC and ABAG "cannot require local implementing agencies to adopt" mitigation;

- "Even with full implementation… forecasted emissions would not be reduced to target levels… Therefore, this impact would be significant and unavoidable (SU)." [DEIR, Sec. 3.6 (Climate Change, Greenhouse Gases, and Energy), p. 3.6-49 (PDF p. 371)]

This is a central CEQA adequacy issue for three reasons:

1. Significance and unavoidable impacts require transparent disclosure and meaningful alternatives. If major climate impacts are significant and unavoidable, the DEIR must demonstrate it has analyzed a reasonable range of alternatives and mitigation pathways and disclose the real limitations of enforceability.

2. Delegation without feasibility becomes a CEQA problem. The DEIR states MTC/ABAG "cannot require local implementing agencies to adopt the above mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation." [DEIR, Sec. 3.6 (Climate Change, Greenhouse Gases, and Energy), p. 3.6-49 (PDF p. 371)] This reinforces your Top-Down Governance deficiency: the regional plan advances growth-driving strategies while conceding implementation authority and fiscal burden largely sit with locals.

3. This should force scenario envelopes. If even full mitigation cannot assure target attainment under one forecast, the DEIR must disclose how a low-growth forecast and a high-growth forecast change the magnitude of GHG impacts, the probability of attainment, and the scale of mitigation required.

Response I39-8

Please see "Master Response 2: EIR Mitigation Measures" regarding CEQA requirements related to mitigation, significant and unavoidable impacts, and deferred mitigation. Please see "Master Response 3: Plan Alternatives" regarding CEQA requirements for an EIR's evaluation of alternatives. Please also refer to Response I39-3 regarding the request for low and high growth forecasts analyzed in the Draft EIR.

Comment I39-9

4. Energy supply, EV charging, and utility engagement must be treated as core feasibility constraints, not a footnote

4.1. The DEIR describes electricity supply structure (PG&E, Community Choice Aggregators, ISO) but does not demonstrate active utility engagement commensurate with plan scale

The DEIR explains that electricity in the region is supplied through an integrated system, identifying Pacific Gas and Electric Company (PG&E), Community Choice Aggregators, and the role of the California Independent System Operator (ISO). [DEIR, Sec. 3.14 (Public Utilities and Facilities), pp. 3.14-19-21 (PDF pp. 663-665)] This discussion is necessary—but insufficient—given the Draft Plan's major transportation electrification strategy implications.

Response I39-9

The proposed plan is a long-range regional planning document, and the Draft EIR includes a program-level assessment of potential impacts related to energy and utilities. Please also refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. Therefore, additional detailed analysis regarding utility engagement is not possible at this time and would occur as future individual projects under the plan are implemented.

Energy supply and electric vehicle charging are analyzed in Section 3.6, "Climate Change, Greenhouse Gas Emissions, and Energy" of the Draft EIR. As described therein according to the 2024 Integrated Energy Policy Report (IEPR), the passage of landmark laws such as Senate Bill 32 (Pavley, Chapter 249, Statutes

of 2016) and Senate Bill 100 (De León, Chapter 312, Statutes of 2018), the latter mandating 100 percent clean electricity by 2045, established a clear framework for the State's energy transition. In 2022, California expanded on these commitments by setting new interim milestones of 90 percent clean energy by 2035 and 95 percent by 2040 through Senate Bill 1020 (Laird, Chapter 361, Statutes of 2022) and, through Assembly Bill 1279 (Muratsuchi, Chapter 337, Statutes of 2022), codified the goal of achieving net-zero emissions by 2045 and established an 85 percent emissions reduction target as part of that goal. Pursuant to the 2024 IEPR, electrification is an important part of California's AB 32 Scoping Plan, aiming to shift the transportation, buildings, and industry sectors to clean power. Therefore, the State must scale up renewable and zero-carbon energy sources and further implement battery storage infrastructure (CEC 2025). Due to the projected statewide increase in electrical demand, the California Energy Commission (CEC), California Public Utilities Commission (CPUC), and California Independent System Operator (ISO) use elements of the IEPR for planning and procurement in the California ISO's transmission planning and the CPUC's integrated resource plan, resource adequacy, distribution system planning, and other planning processes (CEC 2025). The means of procuring energy to meet forecasted demand and the availability of energy supplies is determined by individual utility companies and informed by the aforementioned planning processes conducted by CEC, CPUC, and California ISO. Therefore, additional text regarding electricity in the region is not warranted in the Draft EIR.

With respect to electricity systems, pages 3.14-19 through 3.14-21 of the Draft EIR provide a summary of the electricity systems providers and infrastructure in the Bay Area. The commenter states that the electricity systems summary discussion is necessary but not sufficient given the proposed transportation electrification strategy. However, the commenter does not provide specific comments regarding why the discussion is not sufficient to address the proposed transportation strategy. The impact associated with electricity infrastructure is provided in Impact PUF-1 of the Draft EIR (pages 3.14-35 through 3.14-42). Impact PUF-1 concludes that implementation of the proposed plan may result in the need for increased utility infrastructure including, electric power. Mitigation Measure PUF-1(e) would require the use of site electric generation and storage systems or equally effective measures to provide energy used by the projects under the proposed plan. Mitigation Measure PUF-1(f) would require mitigating impacts related to the relocation or construction of electric power infrastructure. However, it cannot be concluded with certainty that all impacts related to this potential construction and land conversion would be mitigated to less than significant. Therefore, there may be instances where the relocation or construction of new or expanded electric power infrastructure would cause significant and unavoidable environmental effects, as disclosed in the Draft EIR.

Comment I39-10

4.2. The Draft Plan's program direction includes EV adoption; therefore grid capacity and distribution upgrade feasibility must be explicitly addressed and tied to enforceable commitments

The DEIR states the Draft Plan includes substantial funding directed to non-transportation strategy categories including environmental strategies such as "increased adoption of electric vehicles and transportation demand management." [DEIR, Ch. 2 (Project Description), p. 2-30 (PDF p. 138)]

This is where the DEIR currently falls short as a practical disclosure document: EV adoption is not simply a "transportation" outcome; it is a grid planning and capital delivery program involving distribution upgrades, substation capacity, interconnection, rate impacts, and reliability constraints.

Given the breadth and depth of the Draft Plan and the DEIR, PG&E and other energy suppliers/load-serving entities must be actively engaged in the program assumptions and implementation pathways underlying:

- EV charger deployment assumptions and timelines Load growth projections and peak coincidence assumptions

- Distribution/transmission constraint identification
- Capital improvement and cost allocation frameworks (including who pays and
- affordability impacts)

Required DEIR fix (energy/EV): Provide an enforceable, transparent utility engagement framework (letters/commitments, assumptions, constraints, upgrades, and cost/affordability analysis) and analyze these issues under high/medium/low growth envelopes (because growth and land use patterns strongly affect where chargers are needed and what upgrades are required).

Response I39-10

The proposed plan is a long-range regional planning document, and the Draft EIR includes a program-level assessment of potential impacts related to energy. Please also refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis. As individual projects under the plan are implemented, utility providers would be engaged to determine energy impacts at the project level and the need for electric vehicle infrastructure would be considered.

The availability of energy supplies is determined by individual utility companies and is discussed in Impact PUF-1 in the Draft EIR. Impact EN-1 of the Draft EIR describes the potentially significant environmental impacts due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation, and Impact EN-2 of the Draft discusses conflicts with or obstruction of a State or local plan for renewable energy or energy efficiency. The proposed plan's impacts related to energy were determined to be less than significant, as discussed on pages 3.6-48 through 3.6-51 of the Draft EIR.

Please refer to Response I39-3 regarding the request for low, medium, and high growth forecasts analyzed in the Draft EIR.

Comment I39-11

5. Public services, facilities, and "delegated mitigation" create fiscal and operational exposure that the DEIR must analyze—not simply acknowledge

The DEIR states plainly that schools, libraries, police, fire, parks, and related services are provided by a range of agencies, including cities, counties, special districts, and other providers. [DEIR, Sec. 3.13 (Public Services and Recreation), pp. 3.13-1-5 (PDF pp. 627-631)]

This supports a core point: the Draft Plan drives growth and infrastructure demand, but delivery and funding of many essential services and facilities remains local and often fiscally constrained. This is the Fiscal Incompleteness and Service and Infrastructure Gaps deficiency in CEQA terms: where service impacts are foreseeable, CEQA requires adequate disclosure of the impact pathway and the feasibility of mitigation (including funding and implementing authority realities). Simply stating that other agencies provide services is not sufficient for a region-shaping program when the DEIR simultaneously relies on a single growth forecast and concedes that MTC/ABAG cannot require local implementation of key mitigation. [DEIR, Sec. 3.13 (Public Services and Recreation), pp. 3.13-1- 5 (PDF pp. 627-631)]

Required DEIR fix (services/fiscal): Add an appendix that (at minimum) discloses the order-of-magnitude service demands and capital/operating implications under high/medium/low forecast envelopes for:

- Schools and school operations
- Emergency response (police/fire/EMS)
- Parks/recreation

- Public health and healthcare access
- Water, wastewater, stormwater systems
- Energy distribution upgrades (especially EV charging)

Response I39-11

Please refer to Response I36-2. The plan itself is not growth inducing and provides a blueprint to accommodate regional growth. The Draft EIR evaluates the potential environmental impacts associated with implementation of the proposed plan at a regional, programmatic level. Regarding the feasibility of the proposed mitigation measures, please refer to "Master Response 2: EIR Mitigation Measures." Regarding plan funding, please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources."

Analysis in the Draft EIR is programmatic. Specific details regarding the location of future projects that would occur to implement the plan are not currently known. At this program level analysis, identifying the order of magnitude for service demands is not possible. Please refer to "Master Response 4: Program Level Document" for a discussion regarding program level analysis and "Master Response 2: EIR Mitigation Measures" for a discussion regarding CEQA-compliant mitigation measures and funding mechanisms.

Please refer to Response I39-3 regarding the request for low, medium, and high growth forecasts analyzed in the Draft EIR.

Comment I39-12

6. Funding uncertainty and lack of performance/accountability triggers are CEQA-relevant because they affect feasibility of mitigation and the plan's ability to avoid/lessen impacts

The DEIR describes forecast transportation revenues of $512 billion (2025–2050) and states that 83% of that amount is "reasonably expected," with 17% "new." [DEIR, Ch. 2 (Project Description), Table 2- 15, p. 2-30 (PDF p. 138)]

From a CEQA standpoint, this funding uncertainty and the plan's scale require Performance and Accountability mechanisms—because mitigation and impact reduction rely on actual delivery, operations, and adaptive correction.

Required DEIR fix (accountability): The DEIR (and the Mitigation Monitoring and Reporting Program that follows it) should include binding, measurable triggers such as:

- Forecast reconciliation every 3 years (population, employment, housing, VMT, transit boardings, and emissions)
- If divergence from the adopted forecast exceeds a defined threshold (e.g., ±5–10%) for two reconciliation cycles, require:
    - a formal re-prioritization of major investments, and/or
    - supplemental CEQA review to disclose the new impact pathway

Without such triggers, the DEIR functions as a "static" disclosure document for a "dynamic" planning reality, and it leaves local jurisdictions carrying the risk of mis-forecasting.

Response I39-12

The proposed plan strategies are expected to be funded through both existing and new revenue sources from a mix of federal, state, regional, and local revenues, as opposed to being funded solely by state resources. Regarding plan funding, please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources." Comments related to funding mechanisms for the proposed plan do not raise any concerns regarding the adequacy, accuracy, or completeness of the Draft EIR and will be considered by the MTC Commission and ABAG Executive Board as part of their overall consideration of the proposed plan.

Please refer to "Master Response 2: Mitigation Measures" regarding funding mechanisms related to the proposed plan. Any projects under the proposed plan that cannot show consistency with the Draft EIR would be required to undergo additional CEQA analysis, at which time supplemental review would occur.

Lastly, following statutory requirements, the plan is updated on a 4-year cycle to reassess regional planning context, funding environment, and policy and investment priorities, to ensure that the plan is adaptive and dynamic.

Comment I39-13

7. Administrative record transparency and access must be improved: posting standards and link integrity are part of meaningful public participation

Given the breadth of the Draft Plan and DEIR, meaningful CEQA participation requires that the administrative record be easy to locate, verify, and cite. Therefore:

All public materials (the Draft Plan, the DEIR, all technical/supplemental reports, appendices/attachments, and all submitted public comments and agency responses) must be posted together and directly adjacent to the relevant meeting agenda item(s) on the main meeting webpage, reachable in one or two clicks, not separated into multi-click "landing pages." Link integrity and accessibility must be actively maintained to allow the public to locate and verify the record without unnecessary barriers.

Response I39-13

MTC and ABAG maintain a website for Plan Bay Area 2050+, which can be accessed at the following link: https://planbayarea.org/plan-bay-area-2050-plus. The Draft Plan, Draft EIR, technical appendices, supporting reports, and all public comments received during the review period are available on the Plan Bay Area 2050+ website. CEQA does not prescribe specific requirements for how these documents must be posted; however, MTC and ABAG provide these materials in a centralized and accessible format to facilitate meaningful public review and participation.

Comment I39-14

Requested Actions (DEIR-Level Remedies)

Before certifying a Final EIR, I respectfully request that MTC/ABAG provide a detailed written response (accept/reject with evidence and timelines) and revise/recirculate analysis as needed to incorporate the following:

1. High/Medium/Low Growth Envelopes: Run and publish high/medium/low growth-forecast envelopes through the model/analysis chain and provide comparative impact tables for VMT, greenhouse gases, air quality, energy demand (including EV charging load), public utilities, and public services/facilities.

Response I39-14

Please refer to Response I36-3 regarding the request to analyze a low, medium, and high growth forecast in the EIR. Please refer to Response I29-5 regarding recirculation. The Draft EIR has been circulated consistent with CEQA's public review requirements and all comments received on the Draft EIR have been addressed in the Final EIR. Significant new information has not been added to the Final EIR and none of the circumstances for recirculation have been met. Therefore, the Draft EIR will not be recirculated.

Comment I39-15

> 2. VMT Robustness Under SB 743: Disclose how VMT conclusions change under each envelope and provide clear guidance for local agencies on how to tier without inheriting an inflated regional baseline.

Response I39-15

Please refer to Response I39-3 regarding the request to analyze a low, medium, and high growth forecast in the EIR. Please refer to Response I39-7 regarding analysis of VMT impacts in the Draft EIR. Information on CEQA streamlining opportunities and tiering is included in Section 1.9, "CEQA Streamlining Opportunities," on pages 1-18 through 1-23 of the Draft EIR.

Comment I39-16

3. Climate/GHG Mitigation Feasibility: Address the DEIR's admission that impacts remain significant and unavoidable and that MTC/ABAG cannot require local implementation of key measures; provide enforceable commitments or clearly disclose the limits and the consequences.

Response I39-16

Please see "Master Response 2: EIR Mitigation Measures" regarding CEQA requirements regarding mitigation, significant and unavoidable impacts, and a description of enforceable mitigation.

Comment I39-17

> 4. Energy/EV + Utility Engagement: Demonstrate active engagement by PG&E and other load-serving entities commensurate with the plan's EV adoption and charging needs; disclose constraints, upgrade pathways, costs, and affordability impacts.

Response I39-17

The Draft EIR is a program level analysis of the proposed plan. Please refer to "Master Response 4: Program Level Document" regarding the level of detail included in the Draft EIR. The availability of energy supplies is determined by individual utility companies and is discussed in Impact PUF-1 in the Draft EIR. However, active engagement with utility providers, such as PG&E, would occur later at the project level of review for projects implemented under the proposed plan. Please refer to Response I15-1 regarding economic impacts and CEQA.

Comment I39-18

> 5. Fiscal Sustainability + Service Capacity Appendix: Provide a CEQA-relevant disclosure of service/infrastructure delivery feasibility under each envelope (schools, emergency response, parks, water/stormwater, energy upgrades).

Response I39-18

Section 3.13, "Public Services and Recreation," of the Draft EIR evaluates potential environmental impacts associated with the provision of public services, including schools, police and fire protection, and parks. Section 3.14, "Public Utilities and Facilities," of the Draft EIR evaluates potential environmental impacts associated with the utility infrastructure, including water, stormwater, and energy

systems. The Draft EIR evaluates the potential environmental impacts associated with implementation of the proposed plan at a regional, programmatic level. Please refer to "Master Response 4: Program Level Document" regarding the level of detail included in the Draft EIR. Please refer to Response I15-1 regarding fiscal impacts and CEQA.

Comment I39-19

> 6. Performance Benchmarks + Triggers: Adopt measurable performance benchmarks and automatic triggers for re-prioritization/supplemental review if observed conditions diverge materially from the adopted forecast.

Response I39-19

The proposed plan includes strategies and monitoring mechanisms to track progress toward regional goals, including growth forecasts, housing, transportation, and environmental outcomes. The Draft EIR focuses on analyzing the potential physical environmental effects of implementing the plan, as required by CEQA. Any future adjustments to the plan in response to observed conditions would occur through separate planning processes, which may include plan updates and associated CEQA review as appropriate.

Comment I39-20

> 7. Administrative Record Posting Standard: Implement the posting and link-integrity standard described above to ensure meaningful public participation and a verifiable record.

Response I39-20

Please refer to Response I39-13.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I40 Liang Chao 6

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I40-1

We submit this letter to provide detailed comments on the Regional Housing Needs Allocation (RHNA) framework, housing production mandates, and the legal exposure imposed on local jurisdictions by Draft Plan Bay Area 2050+ ("Draft Plan"). These concerns arise directly from the Draft Plan's inflated population and employment forecast, its non-standard modeling methodology, and the manner in which these assumptions are carried through into RHNA expectations without adequate consideration of environmental, infrastructure, and public-safety constraints documented in the Draft Environmental Impact Report (Draft EIR).

RHNA numbers are not abstract planning targets. They trigger binding legal obligations under State housing law and expose cities to enforcement actions, loss of local land-use authority, and litigation. When RHNA is derived from unrealistic growth assumptions, cities face real legal penalties for failing to accommodate "paper demand"—housing need that exists only in models, not in demographic reality.

Response I40-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

Comment I40-2
Executive Summary of Key Concerns

- **RHNA is directly derived from the Draft Plan's regional growth forecast**, which significantly exceeds the State's official projections published by the California Department of Finance (DOF).
- **The Draft Plan assumes population and job growth that are not supported by recent demographic trends**, including documented population loss from 2020–2025.
- **The Plan uses a non-standard, policy-driven modeling approach** (REMI/UrbanSim) that derives population from assumed job growth rather than demographic fundamentals.
- **Job assumptions are carried forward from the 2021 Plan Bay Area 2050 forecast**, relying on pre-pandemic economic expectations, even as baseline population was revised downward.
- **The Draft EIR identifies numerous environmental and infrastructure impacts as Significant and Unavoidable**, yet RHNA obligations do not account for these constraints.
- **Cities face severe statutory penalties**—including SB 35, SB 330, SB 166, AB 72, and the builder's remedy—for failing to meet RHNA targets that may be unattainable or unsafe.
- **The Draft EIR does not evaluate a Reduced-Growth Alternative aligned with DOF projections,** depriving decision-makers and the public of a lawful CEQA comparison.

Response I40-2
The comment provides a summary of detailed comments provided below. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth and Responses I40-3 through I40-11.

Comment I40-3
1. RHNA Is Explicitly Tied to the Draft Plan's Regional Growth Forecast

Draft Plan Bay Area 2050+ serves as the statutory foundation for RHNA. The Plan describes itself as the region's long-range blueprint for population, employment, and housing growth, and ABAG is required to allocate RHNA consistent with this regional forecast.

The Draft Plan assumes:

- approximately **+1.84 million additional residents by 2050**, and
- approximately **+600,000 additional jobs**.

These assumptions directly scale RHNA totals upward. When the regional forecast is overstated, RHNA is overstated by design.

By contrast, the California Department of Finance projects:

- only **+0.49 million** additional residents in the Bay Area by 2050, and
- a **6.5% growth rate**, compared to the Draft Plan's 24%.

Thus, RHNA derived from the Draft Plan reflects a population increase **nearly four times higher than the State's official projection**. This divergence is not a minor technical difference—it is a structural inflation of housing obligations across every jurisdiction.

Response I40-3
The draft plan anticipates that the Bay Area would grow by approximately 1.84 million new residents and 1.4 million new jobs between 2020 and 2050. Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted growth, including why it differs from the status-quo demographic projection created by the California Department of Finance, and why it has no influence on the 7th Cycle RHNA. As included on page 1-1 of the Draft EIR, Plan Bay Area 2050+ does not include a concurrent RHNA process, as specified by California statute.

Comment I40-4
2. The Draft Plan's Growth Assumptions Conflict with Recent Demographic Trends

The Draft Plan acknowledges updated Census baselines but does not reconcile its long-range growth assumptions **with recent population decline**.

According to Census and DOF data:

- The Bay Area grew modestly in the 2000s,
- grew more rapidly in the 2010s during an exceptional tech boom, but
- **lost population between 2020 and 2025**, reflecting sustained domestic out-migration, lower
- immigration, declining birth rates, and increased remote work.

Despite this, the Draft Plan assumes a sudden reversal to sustained high growth through 2050, without explaining:

- why out-migration would reverse,
- why remote work would re-centralize the workforce, or
- why fertility and immigration trends would change dramatically.

RHNA allocations derived from such assumptions impose obligations disconnected from observed demographic behavior.

Response I40-4
Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth, as well as its relationship with the Regional Housing Needs Determination Process, which is conducted by the California Department of Housing and Community Development (HCD), and typically relies on the DOF projection as a starting point (including in the current RHNA cycle).

Comment I40-5
3. The Draft Plan Uses a Non-Standard, Policy-Driven Modeling Methodology

Draft Plan Bay Area 2050+ and the Draft EIR explain that the regional forecast is produced using **REMI and UrbanSim**, and that the methodology differs from conventional demographic projections.

Under this approach:

1. The Plan establishes **policy-driven land-use and transportation assumptions** (e.g., growth in Priority Development Areas, transit investment patterns).

2. REMI generates **job totals consistent with those policy assumptions**.

3. Population and household growth are then derived from the assumed job growth.

This is fundamentally different from DOF or Census methods, which project population based on births, deaths, and migration. Here**, population becomes an output of policy goals**, not an independent forecast.

RHNA, which is legally binding, is therefore grounded in a circular methodology: policy assumptions generate jobs; jobs generate population; population generates RHNA; RHNA then compels cities to implement the same policy assumptions through zoning and approvals.

Response I40-5

As discussed in "Master Response 1: Regional Growth Forecast", the plan's regional growth forecast is developed using REMI PI, a widely used tool for forecasting and economic impacts analysis. It is not a "jobs-led" forecast. The economy plays an important role, recognizing the strong ties between the economy and migration linking our region and the nation. The forecast leverages the REMI PI model to capture the relationship between demographic change and economic performance, including industry structure, productivity, competitiveness, export propensity, labor supply and demand, and related factors. Unlike status-quo or baseline population projections created by DOF, the plan's regional growth forecast methodology was designed for RTP/SCS planning purposes to better represent dynamic changes to the economy and housing market over time.

With respect to RHNA, HCD did not use Plan Bay Area 2050's regional growth forecast in its RHND calculation for the 6th Cycle RHNA, and the Plan Bay Area 2050+ regional growth forecast has no influence on 6th Cycle RHNA. See also "Master Response 1: Regional Growth Forecast" for more on this point.

Comment I40-6

4. Job Assumptions Are Carried Forward From the 2021 Plan Using Pre-Pandemic Expectations

The Draft EIR explains that the updated forecast:

- "retains the methodology, approach, and key assumptions from Plan Bay Area 2050,"
- while updating baseline population using new Census data.

In practice, this means:

- **2050 job targets from the 2021 plan were retained**,
- even though the population baseline was reduced by roughly 200,000 residents, and
- no updated 2025 job count was incorporated.

These job assumptions reflect pre-pandemic economic conditions, prior to widespread remote work, office downsizing, and accelerating automation. RHNA derived from these job totals therefore rests on **outdated labor-market expectations.**

Response I40-6

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's regional growth forecast. Specifically, while similar, the job growth forecast is not retained from Plan Bay Area 2050, but is based on updated input data (though Plan Bay Area 2050's forecast was updated in the midst of the pandemic to represent the shorter term impact). The relative stability of the job outlook is due to

two factors. The first is national trends, as the CBO's GDP and labor productivity outlook implies a higher job count due to a more tempered outlook in productivity growth. The second involves labor market shifts, including the growth in gig work, second jobs, and self-employment. In the Bay Area such employment types are already common and a prominent economic feature of the labor market. The Modeling and Forecasting Report also contains a discussion on this point, including the dynamic nature of the job concept as work is changing.

Comment I40-7

5. RHNA Creates "Paper Demand" but Triggers Real Legal Penalties

When RHNA is inflated, cities must still:

- zone for large quantities of housing,
- upzone additional sites under SB 166 "No Net Loss,"
- remove development constraints under SB 330, and
- approve qualifying projects ministerially under SB 35 if production falls short.

These obligations apply regardless of whether the projected population actually materializes. The result is "paper demand": theoretical housing need with no corresponding demographic or market demand.

Failure to meet this paper demand exposes cities to:

- **SB 35** ministerial approvals that bypass discretionary review,
- **SB 330** prohibitions on downzoning or growth management,
- **SB 166** perpetual rezoning requirements,
- **AB 72** Housing Element decertification, and
- the **builder's remedy**, under which cities lose zoning control entirely.

The Draft Plan does not acknowledge or mitigate this legal risk, even though RHNA numbers flow directly from its forecast and RHNA.

Response I40-7

Please refer to "Master Response 1: Regional Growth Forecast" regarding the relationship between the plan's regional growth forecast and RHNA, including the initial step of the Regional Housing Needs Determination by HCD, setting overall regional targets. As the response notes, for the Bay Area, this is typically determined based on the DOF forecast.

Comment I40-8

6. The Draft EIR Identifies Environmental and Infrastructure Constraints That RHNA Ignores

The Draft EIR finds that multiple impacts of the Draft Plan remain Significant and Unavoidable, including:

- wildfire risk and evacuation constraints (HAZ-6, HAZ-7, CUM-8),
- water supply insufficiency (PUF-2),
- transportation/VMT impacts (TRA-2),

- flooding and sea-level-rise exposure,
- public services and emergency response limitations,
- wastewater, stormwater, and landfill capacity constraints.

Yet RHNA allocations do not account for these findings. Cities are expected to accommodate housing growth **even where the EIR acknowledges that impacts cannot be fully mitigated**. This creates a direct conflict between CEQA's disclosure of environmental limits and housing mandates that assume those limits can be ignored.

Response I40-8

Please refer to "Master Response 1: Regional Growth Forecast" regarding the relationship between the plan's regional growth forecast and RHNA and "Master Response 2: Mitigation Measures" regarding significant and unavoidable impacts.

Comment I40-9

7. CEQA Requires a Reduced-Growth Alternative That Evaluates RHNA Outcomes

The Draft EIR evaluates alternatives that differ in growth distribution but **all rely on the same inflated regional forecast**. No alternative examines:

- population growth aligned with DOF projections, or
- reduced RHNA obligations resulting from lower demographic growth.

CEQA requires a reasonable range of alternatives that reduce impacts and reflect plausible scenarios. Given the disparity between the Draft Plan and DOF projections, a Reduced-Growth Alternative is legally required.

Such an alternative would allow decision-makers to evaluate:

- lower RHNA totals,
- reduced environmental impacts, and
- improved alignment between housing obligations and infrastructure capacity.

Response I40-9

Please refer to "Master Response 1: Regional Growth Forecast" regarding the relationship between the plan's regional growth forecast and RHNA. Please refer to "Master Response 3: Plan Alternatives" for a discussion of the reasonable range of alternatives included in the Draft EIR.

Comment I40-10

8. Recommendations and Requests

We respectfully request that MTC and ABAG:

1. **Revise the regional growth forecast** to align with DOF demographic projections.
2. **Prepare a CEQA-compliant Reduced-Growth Alternative** and analyze resulting RHNA obligations.

3. **Reevaluate RHNA methodology** to avoid creating paper demand disconnected from real population growth.

4. **Acknowledge and account for environmental constraints identified in the Draft EIR** when assigning housing obligations.

5. **Clarify that cities will not be penalized** under State housing laws for failing to meet RHNA targets driven by forecast inflation rather than actual demand.

6. **Increase transparency** by publishing modeling inputs, job-control assumptions, and the distinction between aspirational policy goals and empirical forecasts.

Response I40-10

Please refer to Responses I40-3 through I40-9 regarding the regional growth forecast, a CEQA reduce growth alternative, and relationship with RHNA.

Comment I40-11

9. Conclusion

RHNA obligations carry profound legal, fiscal, and land-use consequences for cities. When those obligations are derived from overstated and non-standard growth assumptions, they expose local governments to enforcement actions and loss of local control without a corresponding public benefit. Plan Bay Area 2050+ must be grounded in **realistic demographic projections, transparent modeling, and honest acknowledgment of environmental and infrastructure limits**. Without these corrections, the RHNA framework risks becoming legally vulnerable, environmentally unsound, and disconnected from the lived realities of Bay Area communities.

We respectfully urge MTC and ABAG to revise the Draft Plan and Draft EIR accordingly before adoption.

Response I40-11

Please refer to "Master Response 1: Regional Growth Forecast" for additional discussion regarding the assumptions and methodology of the plan's regional growth forecast. The proposed plan does not include a RHNA update and has no influence on the 7th Cycle RHNA.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter I41 Liang Chao 7

December 18, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment I41-1

We submit this letter to address a critical and unresolved issue in Draft Plan Bay Area 2050+ ("Draft Plan") and its accompanying Draft Environmental Impact Report (Draft EIR): **the Plan's reliance on speculative, unsecured, and externally controlled funding to implement growth-supporting infrastructure and mitigate environmental impacts**. While the Draft Plan sets ambitious goals for housing, transportation, climate resilience, and equity, it does not provide a realistic or enforceable financing framework. Instead, it repeatedly assumes that infrastructure expansion and adaptation will occur through future State, Federal, utility, or local investments—without identifying funding commitments, timelines, feasibility, or accountability mechanisms.

As a result, the Draft Plan effectively **creates unfunded mandates** for local jurisdictions while simultaneously exposing them to statutory penalties for failing to accommodate growth that depends on infrastructure investments beyond their fiscal control.

Response I41-1

The proposed plan is a long-range regional policy framework and is not a financial programming document. The plan does not itself allocate funding to specific projects outside the federally required transportation planning context, nor does it impose taxes or require adoption of new funding measures. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources for additional discussion of plan funding assumptions, fiscal uncertainty, and implementation considerations. Please also refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" for additional information on MTC's relationship to local jurisdictions and the proposed plan's impact on local jurisdictions.

Comment I41-2

Executive Summary of Key Concerns

- The Draft Plan assumes **large-scale infrastructure expansion** across transportation, water, wastewater, stormwater, energy, emergency services, and climate adaptation **without secured funding.**
- The Draft EIR repeatedly relies on **future coordination with external agencies** as mitigation, rather than enforceable commitments.
- Numerous infrastructure-related impacts remain **Significant and Unavoidable**, yet the Plan presumes expansion will occur "as needed."
- Many critical facilities—including water, wastewater, stormwater, transportation, and emergency infrastructure—are already **operating near capacity** or are **located in sea-level-rise or floodprone areas.**
- Local governments are expected to absorb growth **before infrastructure funding is secured**, creating fiscal risk and potential liability.
- CEQA does not allow mitigation to be deferred to uncertain future funding or discretionary actions by third parties.

Response I41-2

The comment provides a summary of detailed comments provided below. Please refer to Response I41-3 through Response I41-10.

Comment I41-3

1. The Draft Plan Relies on Aspirational Funding Rather Than Committed Financing

Throughout Draft Plan Bay Area 2050+, implementation of core strategies is framed as contingent on:

- future State and Federal grants,
- future bond measures,
- competitive funding programs, and

- discretionary appropriations outside MTC/ABAG's control.

For example, the Plan's transportation, climate resilience, and sea-level-rise adaptation strategies repeatedly reference "anticipated funding," "future investment," or "potential sources," without identifying:

- which agency is responsible for securing funds,
- whether funding is already programmed,
- what happens if funding is delayed or not awarded.

The Draft Plan acknowledges that not all strategies are fully funded, yet still treats them as if they will be implemented within the plan horizon. This disconnect is not disclosed as a fiscal risk.

Response I41-3

Plan Bay Area 2050+ is a long-range regional plan that identifies strategies and associated planning-level investment needs over the plan horizon. Many strategies included in the plan depend on future actions by multiple agencies and governing bodies, including federal and state governments, regional agencies, local jurisdictions, and voters. The proposed plan acknowledges that implementation will require substantial coordination and additional funding sources over time, and that not all strategies have committed funding at the time of plan adoption. Plan Bay Area is updated periodically, and funding assumptions and implementation expectations may be refined through future Plan Bay Area updates and amendments as conditions evolve. Please refer to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources," which addresses planning-level investment estimates, funding uncertainty, and implementation considerations.

Comment I41-4

2. Transportation Infrastructure Expansion Assumes Funding That Is Not Guaranteed

The Draft Plan includes major transportation strategies, including:

- systemwide transit expansion and modernization,
- freeway pricing and tolling infrastructure,
- corridor improvements to support Priority Development Areas,
- long-term operations and maintenance of expanded systems.

However, the Draft EIR finds that transportation impacts, including Vehicle Miles Traveled (VMT) impacts (TRA-2), remain **Significant and Unavoidable**, even with mitigation.

Despite this finding, mitigation assumes:

- successful implementation of regionwide pricing strategies,
- continued Federal transit funding for capital and operations,
- long-term State funding for transit service expansion.

No binding commitments or fallback scenarios are identified. If funding does not materialize, cities are still expected to accommodate growth that was premised on these investments.

Response I41-4

Please refer to Response I41-3. Transportation-related investments and strategies in Plan Bay Area 2050+ are planning-level assumptions and depend on future funding availability and subsequent agency actions, including potential legislative and/or voter actions for any new revenue measures. The Draft EIR evaluates the proposed plan at a programmatic level and does not establish binding commitments for future revenue measures or programs. Please refer also to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources."

Comment I41-5

3. Water Supply, Wastewater, and Stormwater Systems Are Already Constrained

The Draft EIR identifies water supply impacts (PUF-2) as **Significant and Unavoidable**, acknowledging uncertainty regarding sufficient water supplies during normal, dry, and multiple dry years.

At the same time, the Draft Plan assumes:

- increased water demand from new development,
- expanded recycled water systems,
- upgrades to wastewater treatment facilities,
- expanded stormwater infrastructure to meet regulatory requirements.

The Draft EIR repeatedly states that mitigation depends on:

- future coordination with water agencies,
- project-level SB 610 and SB 221 assessments,
- future infrastructure investments by utilities.

However:

- no funding sources are identified,
- no schedules are provided,
- no regional commitments are made.

Local ratepayers ultimately bear these costs, yet cities are not given discretion to limit growth until infrastructure funding is secured.

Response I41-5

The commenter is correct that the Draft EIR concludes that Impact PUF-2 (Water Supply) would be a significant and unavoidable impact with mitigation. The Draft EIR acknowledges that the plan area may face future water supply challenges associated with climate change-related periods of drought. The Draft EIR states that the construction and operation of land use, sea level rise adaptation projects, and transportation projects under the proposed plan could generate water demands that surpass water supplies, which could require the acquisition of additional water sources and the imposition of conservation requirements. The Draft EIR identifies Mitigation Measures PUF-2(a) through PUF-2(c) to reduce impacts on water supply by requiring future projects implemented under the plan to work with the applicable water agency to determine if adequate water supply is available.

The proposed plan strategies are expected to be funded through both existing and new revenue sources from a mix of federal, state, regional, and local revenues, as opposed to being funded solely by state resources. Please refer to "Master Response 2: Mitigation Measures" regarding funding mechanisms related to the proposed plan. MTC and ABAG are limited on their ability to fund projects as funding is subject to the project lead agency for individual projects under the plan. Please refer to Response I15-1 regarding CEQA and inclusion of funding sources. Comments related to schedule and funding do not raise environmental issues or concerns related to the adequacy of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment I41-6

4. Sea-Level Rise and Flood Protection Infrastructure Is Assumed but Unfunded

The Draft Plan and Draft EIR acknowledge that:

- many Growth Geographies and infrastructure assets lie in areas vulnerable to tidal flooding,
- storm surge, levee overtopping, and sea-level rise by 2050 and 2100;
- climate change will increase flood frequency and severity.

Nevertheless, the Draft EIR relies on:

- future adaptation projects by external agencies,
- future levee upgrades,
- future shoreline protection measures.

No regionwide funding plan, implementation schedule, or enforceable mitigation program is provided. Cities are expected to approve growth in vulnerable areas while assuming that protective infrastructure will be built later, by others, with unspecified funding.

This constitutes explicit mitigation deferral.

Response I41-6

As stated on page 2-11 of the Draft EIR, the land use growth footprint for the plan is a result of existing zoning and other land use policies, the regional growth forecast, and the proposed plan's Growth Geographies and 35 integrated strategies. Therefore, the land use growth footprint inherently avoids development in high flood-risk areas or sea level rise vulnerable areas. Additionally, the proposed plan's sea level rise adaptation projects build on local and regional planning efforts, incorporating a range of actions to mitigate inundation and storm surge impacts.

The comment asserts that the Draft EIR provides no regionwide funding plan, implementation schedule, or enforceable mitigation program, and that cities are expected to approve growth in vulnerable areas while assuming that protective infrastructure will be constructed later by other entities and unspecific funding. The proposed plan serves as the Bay Areas long-range plan for the region's multimodal transportation system and is designed to accommodate future regional growth for all economic segments of the population while achieving State greenhouse gas emissions reduction targets. As a plan level document and program level review covered in the Draft EIR the proposed plan does not include details on specific projects, rather includes a comprehensive growth footprint. Cities would be subject to their own governance and are not required to approve growth in vulnerable areas, as suggested by the commenter. As a long-range plan the proposed plan does not include a regionwide funding plan or specific implementation schedule and is not required to provide these elements. As analyzed in the Draft EIR

strategies in the context of the proposed plan are defined as either a public policy or a set of investments that can be implemented in the Bay Area through the year 2050. The Mitigation Monitoring and Reporting Program prepared as part of this Final EIR will serve as the enforceable mitigation program for the proposed plan.

Please refer to Response A3-10 and "Master Response 2: Mitigation Measures" regarding deferred mitigation.

Comment I41-7

5. Emergency Services and Public Facilities Face Unfunded Expansion Requirements

The Draft EIR documents impacts to:

- fire protection and wildfire response,
- police and emergency medical services,
- evacuation capacity and emergency access,
- hospitals and healthcare facilities.

Many of these impacts are found to be Significant and Unavoidable or significant absent mitigation. Yet mitigation assumes:

- future station construction,
- increased staffing,
- expanded equipment and facilities,
- improved evacuation infrastructure.

These services are primarily funded by local general funds, special districts, or parcel taxes. The Draft Plan does not identify funding mechanisms to support these expansions while directing substantial population growth to affected areas.

Response I41-7

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding funding mechanisms related to the mitigation measures, CEQA-compliant mitigation measures, and significant and unavoidable impact determinations. Please refer to Response I15-1 regarding CEQA and funding. CEQA does not require an assessment of funding mechanism for mitigation.

Comment I41-8

6. Solid Waste, Utilities, and Energy Systems Are Near Capacity

The Draft EIR acknowledges constraints related to:

- landfill capacity,
- solid waste processing,
- electric grid reliability,
- energy infrastructure upgrades needed to support electrification.

Mitigation relies on:

- future facility expansion,
- future siting decisions,
- technological improvements not yet deployed at scale.

No funding sources, timelines, or responsible agencies are identified. These assumptions again defer mitigation to uncertain future actions.

Response I41-8

Please refer to Response I41-7 regarding funding sources for mitigation measures. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding funding mechanisms related to the proposed plan and deferred mitigation. Timing for mitigation measures is included in the Mitigation Monitoring and Reporting Program of this Final EIR. As a program level document responsible agencies for future projects under the plan cannot be assumed and mitigation in the Draft EIR refers to the future responsible agencies as "implementing agencies" and "projects sponsors" responsible for implementing mitigation. Please also see "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," which discusses the role and authority of MTC and ABAG.

Comment I41-9

7. CEQA Prohibits Deferring Mitigation to Speculative Future Funding

Under CEQA, mitigation must be:

- feasible,
- enforceable, and
- supported by evidence that it will occur.

The Draft EIR repeatedly defers mitigation to:

- future State or Federal programs,
- future utility investments,
- future local planning actions.

Without identified funding, schedules, or enforceable commitments, this approach does not satisfy CEQA. The EIR's acknowledgment that many impacts remain Significant and Unavoidable underscores the inadequacy of the mitigation framework.

Response I41-9

Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding feasible, enforceable, deferred mitigation, and significant and unavoidable impact findings. The mitigation measures in the Draft EIR include enforceable commitments as shown in the Mitigation Monitoring and Reporting Program. Please refer to Response I41-8 regarding mitigation schedules and funding. Please also see "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," which discusses the role and authority of MTC and ABAG

Comment I41-10

8. Unfunded Mandates Create Fiscal and Legal Risk for Cities

By relying on speculative infrastructure expansion, the Draft Plan places cities in an untenable position:

- Cities must rezone and approve housing under RHNA.
- Cities lack authority to guarantee State or Federal funding.
- Cities face liability if infrastructure, emergency services, or flood protection fail.
- Cities risk enforcement actions if they delay growth pending infrastructure funding.

This imbalance between obligation and authority is not disclosed or addressed in the Draft Plan.

Response I41-10

Please refer to Response I41-3. Plan Bay Area 2050+ is a long-range regional plan and does not override local land use authority or approve specific development projects. Plan implementation depends on future actions by responsible agencies and jurisdictions over time. RHNA requirements are established through separate state processes and laws and are not determined by the Draft EIR. Please refer also to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," which addresses coordination with local jurisdictions and the plan's role as a guiding framework rather than a mandate.

Comment I41-11

9. Recommendations and Requests

We respectfully request that MTC and ABAG:

1. Prepare a detailed regional infrastructure financing plan identifying costs, funding sources, and funding gaps.
2. Explicitly disclose unfunded mandates and fiscal risks in the Final Plan and Final EIR.
3. Tie growth assumptions to secured or reasonably certain funding, not aspirational programs.
4. Strengthen mitigation measures with enforceable commitments, funding triggers, and performance standards.
5. Clarify that cities will not be penalized for limiting or delaying growth where infrastructure funding is unavailable.
6. Evaluate a reduced-growth alternative that reflects infrastructure and fiscal constraints.

Response I41-11

Please refer to Responses I41-3 through I41-10. Please refer to "Master Response 2: EIR Mitigation Measures" for a discussion regarding CEQA-compliant mitigation measures and funding mechanisms and refer to "Master Response 2: Plan Alternatives" for a discussion of the reasonable range of alternatives included in the Draft EIR. Please also see "Master Response 7: Regional Coordination, Partnerships, and Local Implementation," which discusses the role and authority of MTC and ABAG

Comment I41-12

10. Conclusion

Draft Plan Bay Area 2050+ depends on a level of infrastructure investment that is neither funded nor guaranteed. By assuming future State, Federal, and utility investments without binding commitments, the Plan shifts fiscal risk and liability to local jurisdictions while constraining their ability to manage growth responsibly.

A credible regional plan must align growth expectations with **realistic funding, infrastructure capacity, and fiscal responsibility**. Without these corrections, Plan Bay Area 2050+ risks becoming an unfunded mandate that exposes cities to financial strain, legal challenges, and public safety risks.

We respectfully urge MTC and ABAG to revise the Draft Plan and Draft EIR accordingly before adoption.

Response I41-12

Please refer to Responses I41-3, I41-4, and I41-10, which address reliance on future funding sources, transportation funding uncertainty, and implementation responsibility. Please refer also to "Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources." The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan and Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

2.2.4 Public Hearings

Letter PH1 Mei-Ling Stefan

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH1-1

Good morning. My name is Mei-Ling Stefan, Sunnyvale resident with a deep interest in sustainability and environment. In the project description on transportation, for instance, on page 112 of the DEIR pdf file, it is stated that the expected transportation revenue will be $512 billion. As I understand, taxpayers subsidize our public transit system. I'd like to request the Commission to direct Staff to show a breakdown of the revenue sources. In particular we should know how much of the expected revenue will come from future taxes, bonds, or increased tolls in the Plan Bay Area 2050+. Higher costs of living will make more people leave for other states or leave from the Bay Area. Thank you.

Response PH1-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The proposed plan is a long-range regional policy framework and is not a financial programming document. The plan does not itself allocate funding to specific projects outside the federally required transportation planning context, nor does it impose taxes or require adoption of new funding measures.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH2 Susan Kirsch

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH2-1

Susan Kirsch, Catalysts for Local Control. I want to speak about the Draft EIR and especially about Table 4-34, which is called Summary Comparison of Impacts for the Proposed Plan and the Alternative Plans. And what I want to call out in terms of context of this is, so, the Draft EIR has been evaluated by the 14 components of standard EIRs required by CEQA. And they discovered that there are 67 elements that they were evaluating in each of these four categories of housing, transportation, economy, and environment, and then along the 14 elements of the EIR. And they rate them according to being -- having less-than-significant impact on the environment to a rating of being significant and unavoidable. And of the 67 items that they rated, 52 percent of those items are rated as being significant and unavoidable. Now, really, how can we be looking at a plan that is intended to improve anything, and in the EIR those plans are shown to have greater hazards than improvement? And I'll give you a couple of examples. On the issue of climate change, where Plan Bay Area was introduced around that topic, the finding is that it will result in a net increase of greenhouse gas emissions. All right. Let's go on and look at the issue of hazards and wildfire. Hazard Item 6, they find that this report can interfere with evacuation routes. They find that there will be water and fire hazards. You cannot approve a plan like this with this many hazards. I urge you to redo. Go back to the population figures and then look at the EIR. Thank you.

Response PH2-1

The comment regarding the number of impacts identified in the Draft EIR is noted. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable impact findings in the Draft EIR.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH3 Ken Bukowski

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH3-1

The Draft seems to indicate that we're going to still have local land use control. And all the existing state legislation is wiping out local land use control. So, I don't know if that has been properly evaluated. And the idea that we're having all this housing and no money for local services, what result is that going to have? I just see -- so the document really needs to better evaluate that, that circumstance. Thank you.

Response PH3-1

Please refer to "Master Response 7: Regional Coordination, Partnerships, and Local Implementation" regarding local land use control.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH4 Elizabeth Henry

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH4-1

Hi. Elizabeth Henry, Lafayette. And I'm also a member of Catalysts for Local Control. There was a comment made a little bit ago that goes to the heart of this entire situation, and it upsets me every time I hear it. The assumption that there is a severe shortage of housing in the State of California. That is a lie. There are 1.7 million vacant, unoccupied housing units in the State as we speak. There is no housing shortage. And I was an English major at Cal. I know the difference between the phrase "affordable housing" and "severe housing shortage." All the 500 bills use the term "severe housing shortage" so that they can get their bills passed. But in fact those 500 pieces of legislation that have been passed have not produced any affordable housing because they're not written to do so. They're written to take away local control. They're also giving more control and power to the billionaires that are funding this entire farce on our, on our society in California. 19 percent of the housing units in California are owned by the billionaire land investors. And may I add, those billionaire land investors are the same billionaires that put Trump, Donald Trump, in the White House. So, you know, you need to go back to the drawing board and look at reality. 1.7 million vacant housing units does not say there's a housing shortage.

Response PH4-1

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to page 3.11-4 of the Draft EIR for a discussion of housing affordability.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH5 Tom Rubin

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH5-1

Thank you. Tom Rubin again from the City of Oakland and SHIFT. Thank you for this opportunity, Commissioners. What I want to comment on this time, I'll start with one thing that is right in the Notice of Preparation of the EIS; that this is a 1-trillion-475-billion plan and of that it will require 862 billion of new funding. And by the way, a lot of existing funding, on my review, is not very secure. That's 58 percent new funding. That is $4,000 a year in new taxes from every man, woman, and child in the Bay Area. Do you really want to put your name on that? What we have is an incredible number of assumptions; all of which are incredibly favorable. And when you have a plan like that, it's obvious it's going to fall apart as have your previous plans. And I'll be reporting on that and putting in more detail. So again, I urge you to go in, get help where needed, and advise your Staff that they just have to do better. I will remind you in closing that SHIFT, as it's now known, and me personally, I was the one who found the error in RM4 that was in the actual ballot language and which appeared to be the final straw that finally got the Commission to take it off the ballot. We are going to be looking again. And I thank you very much for making so many incredible mistakes in the report and the EIS. We will use this in fighting your tax proposals.

Response PH5-1

No specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. Please refer to “Master Response 6: Funding Risks, Fiscal Uncertainty, and Reliance on New Revenue Sources” regarding plan funding.

The MTC Commission and ABAG Executive Board will consider the comments as part of their overall consideration of the proposed plan.

Letter PH6 Mei-Ling Stefan

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH6-1

Hello. My name is Mei-Ling Stefan from Sunnyvale. I agree with previous speakers and the conclusion that we need to go back to the drawing board. There are many significant and unavoidable impacts as listed in Table ES-1, starting on page 29 of the DEIR pdf document. Please do not approve the EIR with an overriding statement to wave away these concerns or we may end up with negative impacts even if we do not get any benefits as advertised.

Response PH6-1

Please refer to "Master Response 2: Mitigation Measures" for an explanation of significant and unavoidable impact findings in the Draft EIR.

Comment PH6-2

The worst of the negative impacts may be self-inflicted by Plan 2050 based on the Plan's assumptions of increases in population and transit and the focus on urban cause. For example, if the Plan projections were correct, alarms should be sounded now for the shortage of landfills for urban core areas as detailed on page 692 and Table 3.14-5 in the DEIR. Solid waste will have to be transported longer distances to unfilled or newly constructed landfills in less populated areas.

Response PH6-2

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth. As discussed on page 2-2 of the Draft EIR, the proposed plan is designed to accommodate the region's forecasted growth in population, households, housing units, and jobs within the region, and shape the development pattern and encourage a mode shift to transit in a manner intended to reduce VMT levels, as well as other environmental impacts that may occur through a more dispersed development pattern and auto-oriented travel pattern.

The comment refers to Table 3.14-5 of the Draft EIR, but no specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. Please refer to Section 3.14, "Public Utilities and Facilities" of the Draft EIR for an analysis of solid waste.

Comment PH6-3

Our sewer system consists of more than wastewater treatment plants. And many of our cities' aging sewer pipes should be considered in the EIR.

Response PH6-3

Sewer lines are considered part of wastewater treatment facilities in the Draft EIR. Specifically, wastewater treatment facilities are defined on page 3.14-3 of the Draft EIR as follows:

> Urbanized and unincorporated areas of cities and counties throughout the Bay Area provide wastewater treatment facilities. These facilities include systems made up of pipelines, pump stations, interceptor stations and discharge stations.

Impacts associated with wastewater treatment facilities are discussed in Impact PUF-1 of the Draft EIR (pages 3.14-35 through 3.14-42 of the Draft EIR).

Comment PH6-4

Cost estimates should be provided for improving or building new infrastructure for public facilities.

Response PH6-4

Please refer to Response I14-1 regarding economics and CEQA. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment PH6-5

The premise of bumping up job and housing in urban cores should be examined. Wouldn't it be more beneficial and equitable to increase jobs in job-poor, less-urbanized areas where living expenses are lower?

Response PH6-5

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response PH6-2 for discussion on the growth pattern. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment PH6-6

Also, please examine the greenhouse gas emissions of concrete used in constructions. Thank you.

Response PH6-6

The Draft EIR includes a qualitative analysis of potential greenhouse gas emissions from construction activity associated with projected land use development and proposed transportation projects. At the program level of analysis, it is not possible to accurately quantify the amount of emissions expected from implementation of the proposed plan because of variability in the extent of construction based on site conditions throughout the Bay Area, and the fact that project details needed to conduct such an analysis are not and cannot be known at this level of analysis. Please refer to "Master Response 4: Program Level Document" regarding program level analysis prepared for the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter PH7 Gregg Dieguez

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH7-1

All right. So, it should be obvious that any Plan which results in a DEIR with two thirds of the impacts significant and unavoidable is not a real Plan.

Response PH7-1

Please refer to "Master Response 2: Mitigation Measures" for a discussion of the significant and unavoidable impact determination in the Draft EIR. Please also refer to "Master Response 4: Program Level Document" for a discussion of the level of detail for the program level analysis prepared in the Draft EIR.

Comment PH7-2

The current alternatives still rely on a transit network design, which requires taking everybody from everywhere to the same places at the same time. And that's part of the problem. It's expensive. It creates peak demand themes and wastes money the rest of the day. Had there been better alternatives considered that didn't keep pouring money into the current traditional transit sinkhole, there would have been far fewer problems to mitigate in this DEIR. Currently traditional transit in the eight major Bay Area agencies is over seven times more expensive per passenger mile than a cheap EV. Traditional transit also ties up sixteen times as much money in depreciating assets, unfunded retirement benefits, and future asset replenishment burdens. And traditional transit pollutes more than an EV. In Seoul, South Korea they recognized these issues. And instead of inflexible, expensive, fixed rail systems, they broadened the use of express buses and bus lanes. An emerging industry of autonomous vehicles, led in part by the Bay Area, offers cheaper, less polluting alternatives that can pick people up and, as airport vans do, route people collectively on demand. People don't want to carry their Thanksgiving turkeys home in the rain. Door-to-door distributed transit alternatives should be a centerpiece of a newly designed transit alternative. And this DEIR should be redone based on reasonable, cost-effective, agile alternatives. Thank you.

Response PH7-2

The economic factor of an alternative is not considered by CEQA because it is not an impact to the natural or physical environment. Please see Response I15-1. Please refer to "Master Response 3: Plan Alternatives" for a discussion of the reasonable range of alternatives included in the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter PH8 Ann Duwe

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH8-1

Okay. It seems to me that buried deeply in the Plan Bay Area is an assumption that so much housing is going to be built that the cost will somehow magically revert to levels not seen since the early 2000s. I think that is magical thinking. I would like to say that until the population assumptions are valid, until the housing costs are valid, and until the negative impacts associated with the Plan are abandoned or overcome with better planning, the Draft EIR should not be even brought up for a vote. I think this Plan, while it has potential, is not yet sufficiently truthful to conditions on the ground. So, I urge you to revisit those areas of the Plan that have been called into question this morning. Thank you.

Response PH8-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population and housing growth. Regarding the assumption for housing cost, the plan assumes that the *relative* housing price – the regional "premium" relative to the U.S. - will gradually narrow, and that by 2050, the Bay Area home price index premium relative to the U.S. would be back to levels observed in 2001.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter PH9 Dan Haggerty

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH9-1

Okay. Yeah. Again, Dan Haggerty. El Granada, San Mateo Coastside. I want to say I agree with the comments on the EIR from Susan Kirsch, Elizabeth Henry, Gregg Dieguez, and Tom Rubin and others of the Catalysts for Local Control. This needs to go back to the drawing board and include a true robust outreach to the citizens of the region who will be dramatically affected by the added taxes and degraded living condition as a result. I want to continue and say that all the time I'm witnessing near misses of injuries in San Francisco and other Bay Area cities. A lot of the recent so-called improvements have many unanticipated negative results that are not being addressed. One example, the recent bike lanes on proposed Highway 1 in the coastside. You know, this area, there's a lot of -- every area is different, but what's happening is it seems like this cookie cutter method of putting the same thing everywhere. Every different neighborhood has different needs and issues. We have an off-the-highway bike lane currently that needs to be expanded and brought further north. But, you know, with all these cars coming out of these neighborhoods, right now they have to, you know, give attention to just to the two cars when they

make a left turn. And now in the future, it'll have not only the two cars but different rate of speed of bicycles, e-bikes, scooters, et cetera. So, many of these things need to be relooked at closely

Response PH9-1

Thank you for your comment. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Responses PH2, PH4, PH5, and PH7.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH10 Robert Cox

November 14, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH10-1

Thank you for the opportunity to follow-up on this. You know, in eight years in serving on the Planning Commission in Mountain View, adopting a Statement of Overriding Considerations is a truly serious matter and should only be taken after careful and correct analysis and understanding that the community interests override the problems that are going to come from taking that Statement of Overriding Considerations. I mean when I was on the Planning Commission, we must have viewed pretty much 50 different projects. And we only had to do the Statement of Overriding Considerations maybe three times. And, you know, but the sad thing about this, as many speakers have already mentioned, is that the results of the analysis leading to the desire for a Statement of Overriding Considerations is based on faulty population and job projections. And so I mean, you know, that's where we need to just go back to the drawing board and get correct input data to assess what is the actual situation likely to be over this next 25-year period and then see whether we even need this Statement of Overriding Considerations. Thank you for listening to what I have to say.

Response PH10-1

Please refer to “Master Response 1: Regional Growth Forecast” regarding the proposed plan’s forecasted population and job growth and refer to “Master Response 2: Mitigation Measures” regarding significant and unavailable impact conclusions. The Statement of Overriding Considerations has been prepared as part of the Findings of Fact that will be considered by the MTC Commission and ABAG Executive Board.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH11 Susan Kirsch

December 3, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH11-1

S-u-s-a-n K-i-r-s-c-h. And I'm founder-director of Catalysts for Local Control. And the first point I'd like to make is regarding the fact that when you were describing the alternative that you selected, you made the statement that each of the alternatives shared the same growth projections. And I'd like to raise this as a significant issue because it links to what is displayed in Table 2-14 of the EIR, which shows that MTC is

using a calculation of a growth rate of 24 percent for the state over the time period, which is in significant contrast to what the Department of Finance is projecting as a growth rate at 6.4 percent. So, considering that there's already this kind of discrepancy, which ought to be cleared up during this process of review of the EIR, there's also this issue that California, what we've lost, congressional seats. We have people moving out of the state. We don't have a balance between births and deaths, and we have some immigration issues. So, the alternatives didn't take that into account and that there is such a discrepancy between MTC's kind of wishful thinking. And I'd like to link that to one other point in the EIR, and that is in Table 1.1. There is the disclosure that an out-of-court settlement in 2013 with the Building Industry Association gives the building industry the authority to assess and establish a regional growth total number. And that power and authority ought to also be looked into as this EIR moves forward. Thank you.

Response PH11-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth, "Master Response 3: Plan Alternatives" regarding a reasonable range of alternatives in the Draft EIR, and "Master Response 5: Building Industry Association of the Bay Area Settlement Agreement" regarding the settlement agreement with the Building Industry Association.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

Letter PH12 Terrie Green

December 4, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH12-1

Again, my name is Terrie Green, T-e-r-r-i-e Green, like the grass, G-r-e-e-n. The environmental impacts that you've been talking about require mitigation measures.

Response PH12-1

Mitigation measures are provided throughout Chapter 3, "Environmental Impacts and Mitigation Measures," of the Draft EIR to mitigate the identified significant and potentially significant impacts. Please also refer to "Master Response 2: Mitigation Measures" regarding significant and unavoidable impact conclusions in the DEIR.

Comment PH12-2

We want to be able to create healthy and safe streets, but the streets have to be looked at right now in terms of what problems they are causing because of its design. We have to also look at protecting and preserving the affordable housing that exits now, as well as the project housing that exists. We have to look at, how are we going to reduce the hazards that are being caused by the current transportation infrastructure that exits right now? I do not see that when I'm looking at the plans. I will send you some more information. But according to the CalEnviroScreen, in Marin City we have a 99 for traffic. And so, when you look at the air quality, it is poor. It's terrible. Nowhere else -- in Marin County there are, I believe, 12 or 16 barrier walls. Marin City, we don't have one. And the homes, the houses, are just a rock throw from the freeway. We have to have a barrier wall. Because air quality, we already know that it's a killer. And so, the life-threatening issues that we are experiencing that have a direct result in terms of the highway that's right like not even a rock's throw away, it must be addressed. Thank you.

Response PH12-2

Please refer to Section 3.4, "Air Quality" of the Draft EIR for an assessment of air quality impacts and Section 3.15, "Transportation" of the Draft EIR for an assessment of transportation hazards. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter PH13 Mei-Ling Stefan

December 4, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH13-1

There are many significant and unavoidable impacts as listed in Table ES-1, starting on page 29 of the DEIR pdf. Bay Area residents should not be so condemned. The worst of the negative impacts are self-inflicted by the plan's forecast of 24 to 25 percent population growth and the agenda to concentrate growth in urban cores.

Response PH13-1

Please refer to "Master Response 2: EIR Mitigation Measures" regarding the significant and unavoidable impact findings in the Draft EIR, refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth and refer to Response PH6-2 regarding the proposed plan's growth pattern.

Comment PH13-2

If the planners are serious, alarms should be sounded now for the pending shortage of crucial infrastructure.

Response PH13-2

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment PH13-3

I was surprised to see in section 3.14, page 645, that there were no comments received during the scoping process that addressed public utilities and facilities. How can this be if there was a robust outreach?

Response PH13-3

Scoping comments received in response to the Notice of Preparation are included in Appendix B of the Draft EIR. The public review period for the Draft EIR was from October 20 through December 18, 2025. The public review period lasted 59 calendar days. Circulation of the Draft EIR met requirements under CEQA Section 21091(a), which states that the public review period for a Draft EIR shall be at least 45 days. MTC and ABAG also posted legal notices about the availability of the Draft EIR and associated public hearings on the proposed plan and Draft EIR in the newspapers and publications in East Bay Times, La Opinion de la Bahía (in Spanish), Marin Independent Journal, Napa Valley Register, San Francisco Examiner, San José Mercury News, San Mateo County Times, Santa Rosa Press Democrat, Sing Tao (in Chinese), and Solano County Daily Republic. Please see Section 1.2, "Draft EIR Public Review Process," of the Final EIR for details.

Comment PH13-4

As an example of my concern about the neglect, Table 3.14-5 details the alarming shortage of landfills for urban cores owing to population growth. Then why is there no planning and cost estimates for new landfills starting now?

Response PH13-4

Please refer to Section 3.14, "Public Utilities and Facilities" of the Draft EIR for an analysis of solid waste. The comment refers to Table 3.14-5 of the Draft EIR, but no specific issues related to the content, analysis, or conclusions in the Draft EIR are raised in this comment. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Comment PH13-5

Our sewer system consists of more than wastewater treatment plants. And the capacities of our city's old sewer pipes should have been considered in the EIR. And cost estimates should be provided. Thank you.

Response PH13-5

Please refer to Response PH6-3 regarding wastewater treatment facilities discussion in the Draft EIR.

Cost evaluation is not required by CEQA because it is not an impact to the natural or physical environment. Please refer to Response I15-1.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter PH14 Anthony Nachor

December 4, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment PH14-1

Okay. Perfect. So, I am reading through your Draft EIR. And I would like to focus on Table 3.15-9, which shows an ambitious estimate of growth of commuters using public transportation. Wherein, I really feel that while the growth might be ambitious, I also fear that not all commuters might want to switch to public transportation if we continue to invest more in widening our freeways and highways and our roadways. Because, as you may understand, the culture in the United States is geared more towards the automobile. So I would love to see, you know, like where your estimates come from in terms of how did we come up from about 900,000 commuters in 2023 to over 2 million come 2050? Because realistically it takes time to build and expand transit ridership; that I believe that if we really want to reach that number of riders in the Bay Area, we definitely need to increase not just the funding but also the services provided and the housing and the workplaces necessary to support that huge ridership. Thank you.

Response PH14-1

The Draft EIR's transit ridership and mode share results are based on the Draft Plan Bay Area 2050+ strategy package and the integrated regional land use and transportation modeling framework used to evaluate the proposed plan and alternatives. Projected increases in transit commute mode share reflect the combined effects of: (1) planned transit service improvements and transit modernization strategies; (2) land use assumptions that concentrate housing and employment growth in transit-accessible areas; and (3) pricing and demand management strategies intended to reduce reliance on single-occupancy vehicle travel and support mode shift. The Draft EIR analysis is programmatic and intended for comparative purposes under CEQA; it evaluates how different combinations of regional strategies and

growth patterns affect travel behavior, rather than predicting the precise future actions of individual commuters. Please refer to "Master Response 1: Regional Growth Forecast," which addresses the integrated modeling methodology and the use of consistent assumptions in evaluating the proposed plan and alternatives.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

2.2.5 Online Forms

Letter F1 No Name

October 20, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment F1-1

The draft EIR should be extended by 2 days due to the Thanksgiving holiday as most companies and government entities recognize the two days as the Thanksgiving holiday (11/27/25 and 11/28/25.)

Your comment period of the draft EIR is unfortunate due to Thanksgiving holiday and preparation for Christmas holiday season.

This comment period 10/20/25 - 12/18/25 will produce inadequate participation from the public due to Thanksgiving holiday.

The goal to get the most public participation on the Draft EIR for Planned Bay Area NOT the least public participation!

MTC/ABAG organization should add Two more days minimum to the draft EIR comment period due to the Thanksgiving holiday.

What days do ABAG /MTC employees get their paid Thanksgiving holiday? I assume 11/27/25 & 11/28/25?

What days are your offices closed for the Thanksgiving holiday?

What's the right thing to do regarding Thanksgiving holiday within the draft EIR comment dates vs the allowed dates?

Have a heart and add 2 days to the draft EIR comment period.

Thank you for your consideration.

Find all significant impacts is the goal. If NO significant impacts are found, there's no mitigation necessary, correct? For this reason I ask the following.

Give the public the time to comment and exclude the holiday (11/27 & 11/28) in the comment period for the Draft EIR for 2025 draft EIR dates.

Please do not publish my name/ email anywhere attached to this comment.

Response F1-1

Please refer to Response I14-5 regarding Draft EIR public review period.

The MTC Commission and ABAG Executive Board will consider these comments as part of their overall consideration of the proposed plan.

Letter F2 Harold Cummings

October 23, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment F2-1
Like what California forever is thinking. Does it's plan coordinate with Bay Area plan?

Response F2-1
The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter F3 Janet Jamerson

October 24, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment F3-1
THE CLIMATE IS ALWAYS CHANGING. THIS IS EPI EUGENICS AGENDA UN AGENDA 21 and 30 using people you socially engineered here who don't speak English so you can use them for your Eugenics depopulation agenda against Americans and replace them with AI bots.

Response F3-1
The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter F4 Alan Marling 1

November 5, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment F4-1
Good day,

Overall, the plan is excellent. The future will require more public and active transit. It will be more efficient, healthy, and enjoyable. I appreciate you creating more public transit and extending discount programs.

I believe the plan should aspire to make all public transit free. This will encourage people to use it and decrease maintenance costs on car-centric roads. It is also more egalitarian, as currently the expense of public transit is a barrier for the underprivileged.

Sincerely,

Alan Marling

Response F4-1
The proposed plan is a long-range regional policy framework and is not a financial programming document. The plan does not itself allocate funding to specific projects outside the federally required transportation planning context. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter F5 Alan Marling 2

November 5, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment F5-1

Good day,

Overall, the plan is excellent. The future will require more public and active transit. It will be more efficient, healthy, and enjoyable. I appreciate you creating more public transit and extending discount programs.

I believe the plan should aspire to make all public transit free. This will encourage people to use it and decrease maintenance costs on car-centric roads. It is also more egalitarian, as currently the expense of public transit is a barrier for the underprivileged.

Sincerely,

Alan Marling

Response F5-1

Please refer to Response F4-1. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter F6 Angela Giannini

December 13, 2025

Thank you for your comments. Your interest is appreciated, and your comment is now a part of the official record on the proposed plan.

Comment F6-1

Our public transportation is not affordable Nor is it reliable, and it doesn't come frequently enough. You're trying to make the Bay Area be like Europe- the infrastructure is not there. with the unions it's Not feasible to be affordable.

Housing is not affordable so please stop using that terminology 10% blow blown market weight as a joke. if you're gonna get younger people to buy housing, you actually have to make it affordable when you use the terminology affordable San Mateo County has the largest population of 60 and older in all of California less than 2% of major K money is actually going to that population and to veterans which is why we voted for it.

No one wants to ride their bike on El Camino. You guys should be putting some kind of bike lane adjacent to Caltrain so they can get on and off like a regular person that is taking Caltrain but they can just ride their bike along side of it so they don't have to be risk their lives on the road and then you're not taking valuable parking away on El Camino and having the businesses die and taking away sales tax from the county.

Instead, why don't you build covered bus stops with lighting and panic buttons that go to the police stations and that tell people when the next bus is coming like they have in San Francisco. And have fast passes for everybody that are affordable.

We only have 101 ICU beds for the county but you guys are keep building housing, which is ridiculous but no infrastructure for emergency services. I could go on, but you guys don't even really care so this survey is really useless. The only part of the plan I agree with is upgrading the sewer lines on El Camino.

And do not remove one lane each way on San Carlos Ave as it will add huge congestion. Again aging population no need to do this for. a few bicycles. Sorry we will end up doing what San Mateo and SF did on Valencia, taking the bike lanes out and putting parking back a waste of money and time.

Response F6-1

The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. With respect to affordability, CEQA does not require a socioeconomic analysis of affordability or quality-of-life impacts unless such effects are tied to a physical environmental change (State CEQA Guidelines Section 15131). The Draft EIR's analysis of transit and housing affordability relates to potential physical environmental effects associated with transportation projects resulting from transportation investments and future development associated with the land use development pattern. As described in "Master Response 9: Transit-Oriented Communities Policy and Relationship to Plan Bay Area 2050+" and the housing strategies in the proposed plan, Plan Bay Area 2050+ includes strategies intended to improve housing affordability and expand housing opportunities for lower-income households, including strategies focused on preserving existing affordable housing, increasing production of deed-restricted affordable housing, and providing targeted assistance to historically underserved communities.

With respect to the comment related to bike lanes, bus stops, emergency infrastructure, and improvements on San Carlos Avenue, Plan Bay Area 2050+ is a long-range regional plan. Adoption of the plan does not allocate or redistribute federal transportation funds, approve specific projects, or establish funding awards for individual jurisdictions. If adopted, the plan would be advisory and not binding at the local level. Cities and counties, not MTC or ABAG, are ultimately responsible for the manner in which their local communities continue to build out in the future. Please refer to "Master Response 7, Regional Coordination, Partnerships, and Local Implementation," regarding the role and authority of MTC ana ABAG and local land use control.

The MTC Commission and ABAG Executive Board will consider this comment as part of their overall consideration of the proposed plan.

Letter F7 John Arens

December 15, 2025

Thank you for your comments. Your interest is appreciated, and your comments are now a part of the official record on the proposed plan.

Comment F7-1

The predicted population in 2050 in DEIR Table 2-14 is much higher than that forecast by the Department of Finance. ABAG is not neutral; it would like a of construction as would the building industry, which heavily influences ABAG. The DEIR numbers are probably wrong. Using DEIR numbers would result in huge waste. Please correct the error in the DEIR and use Department of Finance numbers.

Response F7-1

Please refer to "Master Response 1: Regional Growth Forecast" regarding the proposed plan's forecasted population growth.

The MTC Commission and ABAG Executive Board will consider the comment as part of their overall consideration of the proposed plan.

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3 REVISIONS TO THE DRAFT EIR

This chapter identifies proposed errata, changes, and clarifications to the Draft EIR. The revisions are presented in the order in which they appear in the EIR. These are minor changes that merely clarify, amplify, or make insignificant modifications to text in the Draft EIR. These text revisions make corrections and/or address comments and do not result in substantive changes that would rise to the level of "significant new information" requiring recirculation.

Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded (CEQA Guidelines Section 15088.5).

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is intended to avoid "endless rounds of revision and recirculation of EIRs" (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132). "Recirculation was intended to be an exception, rather than the general rule" (*Ibid*).

CEQA case law emphasizes that "'[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal'" (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736–737; see also *River Valley Preservation Project v. Metropolitan Transit Development Bd.* (1995) 37 Cal.App.4th 154, 168, fn. 11). "'CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' In short, a project must be open for public discussion and subject to agency modification during the CEQA process" (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936).

As demonstrated in this Final EIR, and summarized below, the revisions to the Draft EIR do not fall into any of the four circumstances identified by CEQA as triggering recirculation. MTC and ABAG have determined that the provisions of Section 15088.5 of the CEQA Guidelines are not triggered and recirculation of this EIR is not required. A more detailed description and substantiation of this determination will be included in the CEQA Findings of Fact.

Of the text changes listed on the following pages: one (1) includes minor revisions to the Project Description; approximately 28 make minor clarifications and corrections to environmental and regulatory setting information; two (2) include the addition of a reference document; approximately fifteen (15) include minor clarifications to text in impact discussions as a result of comment letters; eleven (11) include minor corrections to impact discussions as a result of the modeling revisions for air quality; fifteen (15) include minor corrections to impact discussions as a result of modeling revisions for greenhouse gas emissions; none include the addition of text to existing mitigation measures; and one (1) includes clarifications to alternatives discussions.

As explained in each of the corresponding responses to comments in Chapter 2 of this Final EIR, the revisions and clarifications made in responses to comments serve to amplify and add detail to the existing discussion in the Draft EIR, including the environmental setting and environmental impacts

AIR QUALITY REVISIONS

In May 2025, Congress adopted joint resolutions under the Congressional Review Act, signed into law on June 12, 2025, that overturned U.S. Environmental Protection Agency (EPA) waivers allowing California to enforce several vehicle emissions regulations, including the Advanced Clean Trucks regulation, the Zero-Emission Airport Shuttle regulation, the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and the Heavy-Duty Omnibus regulation. As a result, these regulations can no longer be enforced by the State or counted toward federal air-quality planning under the Clean Air Act. In response to these federal actions, the California Air Resources Board submitted a request to the EPA on October 31, 2025, to adjust the EMFAC2021 emissions model to remove the estimated pollution-reduction benefits associated with these regulations. On November 21, 2025, EPA approved the use of EMFAC2021 with these adjustment factors for State Implementation Plan development and transportation conformity determinations.

In response to EPA's approval of the use of the EMFAC2021 model with adjustment factors for State Implementation Plan development and transportation conformity determinations, the emissions estimates presented in Tables 3.4-10 (EMFAC2021) and 3.4-11 (EMFAC2017) and accompanying text within the analyses were updated to incorporate the approved EMFAC2021 adjustment factors.

Specifically, the following updates were made to the Draft EIR. Regarding revisions to the air quality modeling results, see Section 3.3, "Draft EIR Section 3.4, 'Air Quality' below, which explains that emissions modeling has been updated to reflect the recent approval of EMFAC2021 model adjustment factors by the U.S. Environmental Protection Agency in response to the Congressional Review Act. While there would be minor changes in the emissions modeling outputs as a result of modeling adjustment, these changes do not alter the conclusions of the EIR with respect to the significance of impacts or substantially change the severity of significant impacts; nor do the refinements present new information not previously included in the Draft EIR. The updated modeling results are within the range of emissions estimated in Section 3.4, "Air Quality" of the Draft EIR using both EMFAC2017 and EMFAC2021, with the exception of the estimated emissions of daily tons of operational summertime ROG, which increased from 15.7 tons per day (Table 3.4-11 of the Draft EIR) to 17.2 tons per day (Revised Tables 3.4-10 and 3.4-11) with the updated emissions modeling. This represents an approximately 10% increase in ROG emissions as compared to the Draft EIR. However, an ROG of 17.2 tons per day would remain below baseline (2023) emissions, resulting in an overall decrease in ROG, as assumed in the Draft EIR. Notably, the updated modeling presented in Revised Tables 3.4-10 and 3.4-11 indicates that the reduction in emissions from the updated 2023 baseline to 2050 is estimated to be greater (-39%) than that estimated in in Table 3.4-11 of the Draft EIR (-36%). Although there would be some increase in emissions with the revised modeling the overall reduction of ROG emissions as compared to baseline conditions would remain. Therefore, the increase in ROG would not result in a new significant impact or an increase in the severity of the

environmental impact disclosed in the Draft EIR and there would be no change in the impact significance conclusions from Impact AQ-3 of the EIR.

The updated modeling in Revised Tables 3.4-10 and 3.4-11 shows a greater increase in daily tons of operational fine and respirable particulate matter with an aerodynamic resistance diameter of 2.5 and 10 micrometers or less ($PM_{2.5}$ and PM_{10}) (27% and 34%, respectively) from baseline to 2050 than what was estimated in Table 3.4-11 of the Draft EIR (i.e., a 22% increase in $PM_{2.5}$ emissions from baseline and a 26% increase in PM_{10} emissions from baseline). Impacts in the Draft EIR were determined to be significant and unavoidable and the increase in emissions described above would not result in a new significant or more severe impact. There would be no change in the impact significance conclusions from Impact AQ-3 of the EIR.

While the air quality modeling adjustment would result in an 10% increase in ROG emissions, 5% increase in $PM_{2.5}$ emissions, and 8% increase in PM_{10} emissions, the plan would still result in an overall decrease of air quality emissions for ROG and a minimal increase in particulate matter emissions in 2050 compared to 2023. The model revisions are not considered new information as defined in Section 15088.5 of the CEQA Guidelines, because they do not change any impact significance conclusions or result in a substantial increase in the severity of impacts; nor do the refinements present new information not previously included in the Draft EIR.

For the reasons described above, these revisions do not constitute significant new information, as defined under CEQA Guidelines Section 15088.5, and recirculation of the Draft EIR is not required.

GREENHOUSE GAS REVISIONS

In May 2025, Congress adopted joint resolutions under the Congressional Review Act, signed into law on June 12, 2025, that overturned U.S. Environmental Protection Agency (EPA) waivers allowing California to enforce several vehicle emissions regulations, including the Advanced Clean Cars (ACC) II Program and Advanced Clean Trucks regulation, and Heavy-Duty Omnibus regulation. Similarly, other California emissions regulations requiring waivers under the federal Clean Air Act (CAA) are also impacted including the Zero-Emission Airport Shuttle regulation, the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1). As a result, these regulations can no longer be enforced by the State or counted toward federal air-quality planning under the Clean Air Act. In response to these federal actions, the California Air Resources Board (CARB) revised the emissions factors for air quality modeling programs and released revised greenhouse gas (GHG) adjustment factors for EMFAC2021 in January 2026 to remove the estimated emissions benefits undoing ACT, Zero-Emission Airport Shuttle, Omnibus and Warranty Phase I regulations. Notably, these adjustment factors were developed for the EMFAC2021 model rather than the more recent EMFAC2025 model version as MTC anticipates that the use of EMFAC2025 could result in underestimating future emissions if the recission remains. Therefore, the older EMFAC2021 model, was used because ACC II had not yet been adopted at the time the EMFAC2021 methodology was last updated. Therefore, EMFAC2021 is considered a suitable model to determine project-related impacts.

At the time of the writing of this analysis, EPA has not made a formal decision either approving or disapproving the use of these updated adjustment factors for estimating transportation-related GHG emissions in California. Given these considerations, the use of the EMFAC2021 model in combination with the adjustment factors developed by CARB in January 2026 serves as the most current methodology available at the time of the writing of this analysis to calculate mobile source GHG emissions.

In response to CARB's release of the adjusted EMFAC2021 model for GHG emissions, the emissions estimates presented in Tables 3.6-10 (EMFAC2021), 3.6-11 (EMFAC2017), Table 3.6-12 (annual GHG emissions EMFAC2021) and accompanying text within the analyses were updated to incorporate the

adjusted EMFAC2021 factors. The changes in total emissions from implementation of the plan do not reflect any changes in the land use and transportation planning of Plan Bay Area 2050+, nor any changes made by MTC and ABAG. Rather, the changes in emissions are a result of the federal actions. Under the CAA, California, and other states, have historically been granted waivers to set and enforce stricter vehicle emissions and ambient air quality standards than EPA. EPA and National Highway Traffic Safety Administration adopted the Corporate Average Fuel Economy (CAFE) Standards in 1975, which were amended in 2010 to increase fuel efficiency for passenger vehicles and light-duty trucks. In 2004, California finalized the Pavley Standards (AB 1493), which exceeded the stringency of the CAFE Standard at that time.

In recognition of the discrete challenges of the state's pollution burdens related to geography, meteorology, and population, California was granted a waiver under the CAA to enforce the stricter Pavley Standard. California has invested in enforcing increasingly more stringent fuel economy standards through additional programs including the ACC Program, and more recently the ACC II Program. As noted above, federal Public Laws 119-15, 119-16, and 119-7 revoked several waivers obtained by the state under the CAA, and prevents CARB from implementing stricter regulation of vehicular emissions including the ACC II Program, Low-NO_X Omnibus Regulation, and Advanced Clean Fleet Regulation.

The change in emissions that would result following these changes at the federal level, compared to those reported in the Draft EIR are summarized as follows:

- GHG emissions would be higher in 2050 under the proposed plan than they would have been had the waiver not been revoked.
- GHG emissions would be less than 2023 baseline emissions, although the reduction would not be as great as it would have been had the waiver not been revoked.
- Without Plan Bay Area 2050+ (the no project alternative), GHG emissions were predicted to increase by more than 10 percent between the 2023 baseline year and 2050, as reported in the Draft EIR and this would still be the case.
- Irrespective of whether the waiver is in place, Plan Bay Area 2050+ reduces total GHG emissions below 2023 baseline by 2050, and substantially below 2050 emissions in the absence of the plan, and would meet the current reduction targets of SB 375.

Specifically, the following updates were made to the Draft EIR. Regarding revisions to the GHG emissions results, see Section 3.5, "Draft EIR Section 3.6, 'Climate Change, Greenhouse Gases, and Energy' below, which explains that emissions modeling has been updated to reflect the recent adoption of EMFAC2021 model adjustment factors for GHG emissions by CARB in response to the Public Laws 119-15, 119-16, and 119-17.

As shown below, based on the modeling adjustment, emissions in 2050 would be higher than reported in the Draft EIR (i.e., 56,900 metric tons of carbon dioxide equivalent [$MTCO_2e$] as compared to 52,000 $MTCO_2e$ as disclosed in the Draft EIR). This would result in a change from 2023 to 2050 emissions of -1,700 $MTCO_2e$ (3 % decrease in emissions) as compared to -6,600 $MTCO_2e$ (11% decrease in emissions) in the Draft EIR. While there would be changes in the emissions modeling outputs from the modeling adjustment, these changes do not alter the conclusions of the EIR. A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public review (State CEQA Guidelines Section 15088.5). Pursuant to State CEQA Guidelines Section 15088.5(a) significant new information that requires recirculation is defined as:

1) A new significant environmental impact that would result from the project or from a new mitigation measures proposed to be implemented.

2) A substantial increase in the severity of an environmental impact that would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3) A feasible project alternative or mitigation measure is considerably different from the others previously analyzed and would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

4) The draft EIR was so fundamentally and basically inadequate and conclusionary in nature that meaningful public review and comment were precluded.

Although the model adjustment factors for GHG emissions would result in an increase in $MTCO_2e$ as compared to the findings in the Draft EIR, there would still be an overall decrease in emissions from implementation of the plan. Importantly, the change does not result in an exceedance of any significance threshold.

As discussed in Chapter 2, "Project Description," of the Draft EIR the proposed plan is designed to achieve regional GHG emissions reduction targets established by CARB pursuant to SB 375. The adjustment factors developed by CARB and applied to the EMFAC2021 model, disclosed herein, represent fewer emissions reductions from regulations than presented in the Draft EIR. As discussed above, these estimates do not account for emissions reductions associated with the Advanced Clean Trucks, Zero-Emission Airport Shuttle, Heavy-Duty Omnibus, and Warranty Phase I regulations. The reduction targets mandated by SB 375 are specific to GHG emissions generated from automobiles and light-duty trucks. Emissions estimates used to ensure compliance with SB 375 targets for ABAG and MTC only include emissions from automobiles and light-duty trucks (PRC Sections 21155, 21155.1, 21155.2, 21155.3, 21159.28). Therefore, the modeling adjustments described above would not change the methodology or emissions estimates used in the analysis of the proposed plan's consistency with the legislatively mandated GHG reduction targets under SB 375. For this reason, there would be no change to the impact conclusion of Impact GHG-2 of the Draft EIR and impacts would remain less than significant.

Because the adjusted modeling described above would not alter the emissions estimates or conclusion of Impact GHG-2, the analysis and conclusion of Impact GHG-3 would similarly remain unchanged. As discussed in Impact GHG-3 of the Draft EIR, despite the proposed plan's consistency with the reduction targets of SB 375, CARB has identified that meeting SB 375 goals alone would not be sufficient to meet statewide goals under the 2022 Scoping Plan. The analysis and conclusion of Impact GHG-2 remain unchanged by the modeling adjustments described above. Impact GHG-3's conclusion that forecasted statewide emissions would not be reduced to target levels under SB 32 and AB 1279, despite compliance with SB 375 targets, remains true and the analysis and conclusion of Impact GHG-3 remain valid.

Impact GHG-4 of the Draft EIR is not informed by the emissions estimates derived from the adjusted modeling methodology and results. Rather, Impact GHG-4 cites the proposed plan's reliance on the benefits of dense, compact development coupled with an efficient and diversified transportation network, which would, in tandem, reduce overall per capita energy consumption and related GHG emissions from passenger vehicles and light-duty trucks. Therefore, there would be no changes to the analysis or impact conclusion of Impact GHG-4 from recent changes to the modeling methodology or outputs.

Impact EN-1 of the Draft EIR is a qualitative analysis that assesses the plan's proposed land use plan and transportation infrastructure as it pertains to the wasteful, inefficient, and unnecessary use of energy. As identified in Impact EN-1, the projects proposed under the plan would serve necessary regional needs; would be subject to plan strategies that result in increased efficiency; and would comply with applicable regulations and standards, and would thus not result in the wasteful, unnecessary, or inefficient use of energy. The modeling adjustments and associated changes to emissions estimates described above would not change that individual projects under the proposed plan would be subject to plan strategies

that result in increased efficiency; that projects under the proposed plan would comply with applicable regulations and standards; nor the purpose of the proposed plan to serve necessary regional needs. Therefore, the analysis and impact conclusion of Impact EN-1 would remain valid following the above-described changes to the modeling methodology and outputs.

Impact EN-2 of the Draft EIR is a qualitative analysis that evaluates the proposed plan's consistency with the energy-related goals of the 2022 Scoping Plan. Ultimately, the analysis in Impact EN-2 concludes that implementation of the proposed plan itself would result in the densification of land use, increased energy efficiency from residential uses, a net reduction in the consumption of automotive fuel, and increase reliance on renewable energy sources. For these reasons, the proposed plan would not conflict with the 2022 Scoping Plan. The analysis and conclusion of Impact EN-2 are not reliant on the quantitative results of the modified GHG emissions modeling and, despite the noted increases in GHG emissions resulting from the application of CARB's most recent EMFAC2021 emissions factors, the conclusion that the proposed plan would result in the densification of land use, increase energy efficiency from residential uses, produce a net reduction in the consumption of automotive fuel, and increase reliance on renewable energy sources, remains true.

The fundamental benefit and design of the plan is to reduce GHG emissions. While the GHG modeling adjustment would result in an 8% increase in GHG emissions in the overall plan compared to what would have occurred had federal action not occurred, the plan would still result in a decrease (3%) of GHG emissions in 2050 compared to 2023, and goals and objectives of the plan would still be met under the statutory requirements of SB 375. There would be no change in the impact significance conclusions for Impact GHG-1 of the EIR because GHG emissions would still decrease from plan implementation, would be less than the baseline, and would be less than if the plan were not implemented.

These regulatory changes from CARB are a result of federal mandates imposed on California. However, these regulatory changes would not change the environmental outcome that the plan would result in a reduction in GHG emissions. Therefore, the model revisions are not considered new information as defined in Section 15088.5 of the State CEQA Guidelines, because they do not change any impact significance conclusions or result in a substantial increase in the severity of impacts; nor do the refinements present new information not previously included in the Draft EIR. These emissions estimates are provided for informational purposes and do not alter the findings of the Draft EIR.

The changes on the following pages are presented in the order in which they appear in the Draft EIR and are identified by the Draft EIR page number of the revised text. Each text revision includes the original text in the Draft EIR followed by the revised text.

3.1 CHAPTER 2, "PROJECT DESCRIPTION"

A staff-initiated edit has been added to page 2-2 of the Draft EIR under the summary of the proposed plan. The addition does not alter the conclusions of the EIR with respect to the significance of impacts or substantially change the severity of significant impacts.

Original:

> economic strategies ("land use") to invest $746 billion in expected revenues to accommodate 1.8 million new residents, 1 million new households, 1.5 million new forecasted housing units, and 1.4 million new jobs between 2020 and 2050

Revised:

economic strategies ("land use") to invest $746 billion in expected revenues to accommodate 1.8 million new residents, 1 million new households, 1.1 million new forecasted housing units, and 1.4 million new jobs between 2020 and 2050

In response to Comment A11-6, Table 2-1 on page 2-14 of the Draft EIR has been revised as follows:

Original:

County	Households			Employment		
	Base Year, 2020	Proposed Plan, 2050	Change, 2020 to 2050	Base Year, 2020	Proposed Plan, 2050	Change, 2020 to 2050
Alameda	588,800	840,500	251,700	410,800	526,100	115,300
Contra Costa	396,500	492,000	95,500	127,300	126,300	-970
Marin	108,700	130,900	22,200	67,600	72,400	4,800
Napa	50,500	56,200	5,700	710,700	959,500	248,800
San Francisco	385,600	578,600	193,000	397,400	592,800	195,400
San Mateo	286,700	394,300	107,600	1,079,700	1,620,200	540,500
Santa Clara	646,100	934,600	288,500	128,400	159,600	31,200
Solano	142,600	152,900	10,300	215,900	268,200	52,300
Sonoma	186,100	214,000	27,900	410,800	526,100	115,300
Regional Total	2,792,000	3,794,000	1,002,000	4,023,000	5,434,000	1,410,000

Revised:

County	Households			Employment		
	Base Year, 2020	Proposed Plan, 2050	Change, 2020 to 2050	Base Year, 2020	Proposed Plan, 2050	Change, 2020 to 2050
Alameda	588,800	840,500	251,700	885,600	1,109,000	223,000
Contra Costa	396,500	492,000	95,500	410,800	526,100	115,300
Marin	108,700	130,900	22,200	127,300	126,300	-970
Napa	50,500	56,200	5,700	67,600	72,400	4,800
San Francisco	385,600	578,600	193,000	710,700	959,500	248,800
San Mateo	286,700	394,300	107,600	397,400	592,800	195,400
Santa Clara	646,100	934,600	288,500	1,078,000	1,620,000	540,500
Solano	142,600	152,900	10,300	128,400	159,600	31,200
Sonoma	186,100	214,000	27,900	215,900	268,200	52,300
Regional Total	2,792,000	3,794,000	1,002,000	4,022,000	5,434,000	1,410,000

3.2 DRAFT EIR SECTION 3.3, "AGRICULTURE AND FORESTRY RESOURCES"

In response to Comment O11-13, the following updates have been made to the agriculture and forestry resources section on page 3.3-6 of the Draft EIR:

Original:

> PCAs are open spaces that provide agricultural, natural resource, scenic, recreational, and/or ecological values and ecosystem functions. These areas are identified through consensus by local jurisdictions and park/open space districts as lands in need of protection because of pressure from urban development or other factors. PCAs are categorized into four designations: Natural Landscapes, Agricultural Lands, Urban Greening and Regional Recreation. There are 184 PCAs within the region.

Revised:

> PCAs are open spaces that provide agricultural, natural resource, scenic, recreational, and/or ecological values and ecosystem functions. These areas are identified through consensus by local jurisdictions and park/open space districts as lands in need of protection or enhancement. PCAs are categorized into five designations: Natural Lands, Agricultural and Working Lands, Urban Greening, Recreation, and Climate Adaptation. There are 242PCAs within the region. PCAs can be viewed on MTC and ABAG's Priority Conservation Area Mapping Viewer, which is available at the following link: https://experience.arcgis.com/experience/3fa00ead34c84a43bfa935164dadbd2e/page/Page.

3.3 DRAFT EIR SECTION 3.4, "AIR QUALITY"

The following edits were made to the second paragraph on Page 3.4-31 of the Draft EIR:

Original:

> In an effort to account for a range of potential scenarios, depending on whether the State is able to implement its own stricter emissions standards in the future, a range of mobile source emissions estimates were calculated for the proposed plan. Although the Bay Area Air District requested use of EMFAC2025, the most recently developed mobile source emissions model, in its response to the Notice of Preparation, MTC anticipates that this may result in underestimating future emissions if the recission remains. MTC further anticipates that CARB will recommend off-model adjustments to EMFAC2021 to account for a scenario in which the recission remains in place, but no guidance has been issued at the time of this analysis. Therefore, older emissions models, which do not assume termination of gas engine vehicle sales by 2035, for instance, were used to determine project-related impacts. Emissions were calculated using both EMFAC2017 and EMFAC2021, in combination with equivalent model versions of CT-EMFAC (the California Department of Transportation ([Caltrans]) model based on data derived from CARB's EMFAC model and ancillary data sets. Therefore, the analyses in this EIR do not account for ACC II because ACC II had not yet been adopted at the time the EMFAC2017 and EMFAC2021 methodologies were last updated and thus were not factored into the modeling. See Appendix D for details regarding the various state and federal laws, regulations, and legislative actions accounted for in EMFAC2017 and EMFAC2021. Because EMFAC2021 applies emissions reductions based on more recent mobile source emissions regulations, emissions calculated

using EMFAC2021 are considered a less conservative estimate of emissions. Calculations made using EMFAC2017 provide a more conservative (higher level) estimate of emissions because EMFAC2017 includes emissions reduction estimates based on older, less stringent mobile-source emissions regulations. Notably, EMFAC2021 assumes implementation of the Low NO_X rule and EIR mobile source emissions thus do not account for the June 12, 2025, disapproval of the Low NO_X rule. Despite this, EMFAC2021 remains the current federally-approved model for estimating emissions in California and there is legal uncertainty regarding the enforceability of the federal disapproval of these regulations. Given these considerations, use of EMFAC2017 and EMFAC2021 to estimate a range of potential impacts are considered more conservative methodologies than relying on EMFAC2025, as requested by the Bay Area Air District, to calculate mobile source emissions. As stated above, it is anticipated that CARB will recommend adjustments to the EMFAC2021 model to account for the uncertainty in the regulatory landscape as it is related to transportation-related regulations. The range of emissions calculated using EMFAC2017 and EMFAC2021 is intended to provide a range between which project-generated emissions estimated using the adjusted EMFAC2021 model would likely fall.

Revised:

In May 2025, Congress adopted joint resolutions under the Congressional Review Act, signed into law on June 12, 2025, that overturned U.S. Environmental Protection Agency waivers allowing California to enforce several vehicle emissions regulations, including the Advanced Clean Trucks regulation, the Zero-Emission Airport Shuttle regulation, the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and the Heavy-Duty Omnibus regulation. As a result, these regulations can no longer be enforced by the state or counted toward federal air-quality planning under the Clean Air Act. In response to these federal actions, the California Air Resources Board submitted a request to EPA on October 31, 2025, to adjust the EMFAC2021 emissions model to remove the estimated pollution-reduction benefits associated with these regulations. On November 21, 2025, EPA approved the use of EMFAC2021 with these adjustment factors for State Implementation Plan development and transportation conformity determinations. Thus, the emissions estimates presented in this analysis were performed using this methodology approved by EPA on November 21, 2025.The following edits were made to the paragraph above Table 3.4-10 on Page 3.4-47 of the Draft EIR:

Original:

As detailed in “Methodology,” above, emissions from the proposed plan were calculated using both EMFAC2017, which does not include ACC II emissions reductions and includes emissions reduction estimates based on older, less stringent mobile-source emissions regulations and EMFAC2021, which also does not include ACC II emissions reductions, but includes a cleaner fleet based on more recent mobile source emissions regulations that are still in effect. The emissions results under these models represents a range of emissions that may occur. **Table 3.4-10** shows emissions estimates calculated using EMFAC2021 and **Table 3.4-11** shows emissions calculated using EMFAC2017. As shown in **Table 3.4-10**, mobile source emissions of criteria pollutants ROG, NO_X (summertime and wintertime) in the region would decrease between existing conditions, measured using 2023 data, and 2050 using EMFAC2021. As shown in **Table 3.4-11**, regional mobile source emissions estimates of ROG and NO_X would also decrease between the existing conditions baseline, relying on 2023 data, and 2050 with the use of EMFAC2017, though to a lesser degree than estimated using EMFAC2021 reduction estimates. This is because EMFAC2021 applies emissions reductions based on more recent stricter mobile source emissions regulations as compared to EMFAC2017. Therefore, the emissions estimates shown in **Table 3.4-10** and **Table 3.4-11** represent a comprehensive range of emissions estimates from the proposed plan to incorporate the uncertainty of the future regulatory landscape.

Revised:

As detailed in "Methodology," above, emissions from the proposed plan were calculated using the methodology approved by EPA on November 21, 2025. This methodology uses an adjusted version of the EMFAC2021 emissions model to remove the estimated pollution-reduction benefits associated with several vehicle emissions regulations, including the Advanced Clean Trucks regulation, the Zero-Emission Airport Shuttle regulation, the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and the Heavy-Duty Omnibus regulation. Thus, the emissions estimates presented below were performed using this EPA-approved methodology.

The following edits were made to Table 3.4-10 on page 3.4-47 and the paragraph below Table 3.4-10 on page 3.4-48 of the Draft EIR:

Original:

Table 3.4-10: Emission Estimates for Criteria Pollutants Using EMFAC2021 Emission Rates (tons per day)

	Baseline, 2023	Proposed Plan, 2050	Change, 2023 to 2050 Numerical	Change, 2023 to 2050 Percent
ROG	28.4	16.8	-11.6	-41%
NO_X (Summertime)	36.3	16.0	-20.3	-56%
NO_X (Wintertime)	42.3	19.1	-23.2	-55%
$PM_{2.5}$	3.8	4.7	0.9	23%
PM_{10}	18.7	24.7	6.0	32%

Notes: EMFAC = Emission Factor model; ROG = reactive organic gasses; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter; PM = particulate matter. Forecasts of mobile-source emissions do not account for expected reductions from the implementation of strategy EN8 or EN9 because of modeling limitations.

Source: Emissions modeling using EMFAC2021; data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

As shown in **Table 3.4-10**, when compared to existing conditions (2023), emissions associated with development under the proposed plan modeled using EMFAC2021 would be reduced: ROG emissions by 41% (11.6 tons per day), summertime NO_X emissions by 56% (20.3 tons per day), and wintertime NO_X emissions by 55% (23.2 tons per day).

Revised:

Revised 3.4-10: Emission Estimates for Criteria Pollutants Using EMFAC2021 with Adjustment Factors (tons per day)

	Baseline, 2023	Proposed Plan, 2050	Change, 2023 to 2050 Numerical	Change, 2023 to 2050 Percent
ROG (summertime)	28.4	17.2	-11.2	-39%
NO_X (summertime)	36.4	27.1	-9.3	-26%
NO_X (wintertime)	41.8	30.2	-11.6	-28%
$PM_{2.5}$ (wintertime)	3.8	4.8	1.0	27%
PM_{10} (wintertime)	18.7	25.0	6.3	34%

Notes: EMFAC = Emission Factor model; ROG = reactive organic gasses; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter; PM = particulate matter. Forecasts of mobile-source emissions do not account for expected reductions from the implementation of strategy EN8 or EN9 because of modeling limitations. Forecasts of ROG and NO_X emissions include emissions reductions from five Transportation Control Measures (TCM) incorporated in the 2001 Ozone Attainment Plan; (0.5) tons/day of ROG and (0.7) tons/day of NO_X.

Source: Emissions modeling using EMFAC2021 and EPA approved EMFAC2021 adjustment factors (November 21, 2025); data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

As shown in **Table 3.4-10**, when compared to existing conditions (2023), emissions associated with development under the proposed plan modeled using EMFAC2021 would be reduced: ROG emissions by 39% (11.2 tons per day), summertime NO_X emissions by 26% (9.3 tons per day), and wintertime NO_X emissions by 28% (11.6 tons per day).

The following edits were made to Table 3.4-11 on page 3.4-48 and subsequent paragraphs below Table 3.4-11 on pages 3.4-48 and 3.4-49 of the Draft EIR:

Original:

Table 3.4-11: Emission Estimates for Criteria Pollutants Using EMFAC2017 (tons per day)

	Baseline, 2023	Proposed Plan, 2050	Change, 2023 to 2050 Numerical	Change, 2023 to 2050 Percent
ROG	24.7	15.7	-9.0	-36%
NO_X (summertime)	36.9	34.5	-2.5	-7%
NO_X (wintertime)	41.2	37.8	-3.5	-8%
$PM_{2.5}$ (wintertime)	5.8	7.1	1.3	22%
PM_{10} (wintertime)	22.9	28.9	6.0	26%

Notes: EMFAC = Emission Factor model; ROG = reactive organic gasses; NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter; PM = particulate matter. Forecasts of mobile-source emissions do not account for expected reductions from the implementation of strategy EN8 or EN9 because of modeling limitations. Forecasts of ROG and NO_X emissions include emissions reductions from five TCMs incorporated in the 2001 Ozone Attainment Plan; (0.5) tons/day of ROG and (0.7) tons/day of NO_X.

Source: Emissions modeling using EMFAC2017; data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

As shown in **Table 3.4-11**, when compared to existing conditions (2023), emissions associated with development under the proposed plan modeled using EMFAC2017 would be reduced: ROG emissions by 36% (9 tons per day), summertime NO_X emissions by 7% (2.5 tons per day), and wintertime NO_X emissions by 8% (3.5 tons per day). As identified above, emissions reductions would primarily be the result of increasingly stringent vehicle emissions regulations and implementation of statewide EV sales requirements (e.g., Advanced Clean Trucks, portions of Advanced Clean Fleets, and Multi-Pollutant Emissions Standards for Light- and Medium-Duty Vehicles).

Mobile-source $PM_{2.5}$ emissions would increase by 22% (1.3 tons per day), and PM10 emissions would increase 26% (6.0 tons per day) during the proposed plan's timeframe compared to existing conditions when modeled using EMFAC2017. The higher levels of PM_{10} emissions in 2050 conditions are primarily a function of the 22% growth in VMT (**Table 3.4-6 and Table 3.4-7**) (which directly affects the occurrence of entrained roadway dust), with some contributions from tire and brake wear and exhaust. Exhaust emissions of PM_{10} would not increase at the same rate as VMT (22%) because of the stringent emission controls that would take effect with fleet turnover. Note that daily VMT is projected to increase when comparing the proposed plan to existing conditions, but to a large degree, these increases would be offset by improvements to the vehicle fleet.

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As previously stated, litigation over the federal rescission of California's CAA waiver is ongoing at the time this Draft EIR is being drafted. For the purpose of this analysis, MTC and ABAG have determined that the most accurate analysis feasible involves estimating a range of mobile source emissions using EMFAC2017 and EMFAC2021 to account for uncertainties in the current and

future regulatory landscape. Therefore, it is expected that potential future emissions under the proposed plan would be within this estimated range. As discussed under "Method of Analysis," above, because EMFAC2021 applies emissions reductions based on more recent mobile source emissions regulations, emissions estimates identified in the analyses below which were calculated using EMFAC2021 data are considered a less conservative estimate of emissions, while calculations made using EMFAC2017 provide a more conservative estimate of emissions because it includes reduction estimates based on older, less stringent mobile-source emissions regulations. Even with the use of more conservative modeling, emissions of ROG and NOx will be reduced in the future.

Revised:

Table and text removed.

The following edits were made to the first two paragraphs under "Conclusion" on page 3.4-49 of the Draft EIR:

Original:

Conclusion

At the plan level of analysis, the specific timing, size, and land use that may characterize a project under the plan that exceeds an applicable mass emission threshold is unknown. Therefore, it is conservatively assumed that some land uses would exceed an applied project-level threshold of significance related to exposure to emissions and could cause adverse health outcomes. As stated in "Method of Analysis," to provide a conservative estimate of emissions and associated impacts, this analysis bases its impact determinations on the most conservative emissions estimates calculated using EMFAC2017 and EMFAC2021. The range of emissions calculated using EMFAC2017 and EMFAC2021 is intended to provide a bottom–and top-end estimate between which the emissions calculated using the adjusted EMFAC2021 model would fall. Therefore, it is conservatively assumed that, as shown in **Table 3.4-11**, when compared to existing conditions (2023), ROG emissions associated with development under the proposed plan would be reduced by 36% (9 tons per day), summertime NO_X emissions by 7% (2.5 tons per day), and wintertime NO_X emissions by 8% (3.5 tons per day). The most conservative estimate of mobile-source PM emissions were produced by the emissions modeling conducted using EMFAC2021. Therefore, as shown in **Table 3.4-12**, it is conservatively assumed that mobile-source $PM_{2.5}$ emissions would increase by 23% (0.9 tons per day), and PM_{10} emissions would increase 32% (6.0 tons per day) during the proposed plan's timeframe compared to existing conditions.

Regarding mobile-source emissions, under both the EMFAC2017 and EMFAC2021 emissions estimations, $PM_{2.5}$ and PM_{10} emissions would increase under the proposed plan compared to existing conditions. A key source of PM is the combustion of fossil fuels. After these fuels break down during combustion, they cool, become radicalized, and agglomerate. These particles can form highly toxic compounds, and, when inhaled, the particles can enter the respiratory tract, causing chemical imbalances throughout the body, potentially resulting in inflammation, cell death, and organ failure. The health effects from toxic PM emission compounds can contribute to cardiovascular events, such as stroke and heart attack (EPA 2024).

Revised:

At the plan level of analysis, the specific timing, size, and land use that may characterize a project under the plan that exceeds an applicable mass emission threshold is unknown. Therefore, it is conservatively assumed that some land uses would exceed an applied project-level threshold of

significance related to exposure to emissions and could cause adverse health outcomes. As shown in **Table 3.4-10**, it is estimated that that mobile-source $PM_{2.5}$ emissions would increase by 27% (1 ton per day), and PM_{10} emissions would increase 34% (6.3 tons per day) during the proposed plan's timeframe compared to existing conditions. Both $PM_{2.5}$ and PM_{10} emissions would increase under the proposed plan compared to existing conditions. A key source of PM is the combustion of fossil fuels. After these fuels break down during combustion, they cool, become radicalized, and agglomerate. These particles can form highly toxic compounds, and, when inhaled, the particles can enter the respiratory tract, causing chemical imbalances throughout the body, potentially resulting in inflammation, cell death, and organ failure. The health effects from toxic PM emission compounds can contribute to cardiovascular events, such as stroke and heart attack (EPA 2024).

Table 3.4-12 and Table 3.4-13 have been renumbered and the corresponding text on page 3.4-56 of the Draft EIR has been revised as follows:

Original:

Mobile sources and projected changes in VMT are based on transportation and land use forecasts developed using the MTC travel demand forecasting model, known as Travel Model 1.6, with the land use forecasting model, known as Bay Area UrbanSim 2.6. The integrated model produced the key outputs used in assessing the significance of transportation and air quality impacts, such as VMT. Based on this modeling, it is estimated that implementation of the proposed plan would result in a net increase in VMT (**Table 3.4-6 and Table 3.4-7**); however, as shown in **Table 3.4-12**, there would be a 47% decrease in diesel PM, a 50% decrease in 1,3- butadiene, and a 54% decrease in benzene compared to existing conditions. **Table 3.4-13** shows that, using CT-EMFAC2017 emissions reduction estimates, there would be a 15% decrease in diesel PM, a 14% decrease in 1,3-butadiene, and a 14% decrease in benzene compared to existing conditions.

…

Table 3.4-12: Emission Estimates for Toxic Air Contaminants Pollutants Using CT-EMFAC2021 (kilograms per day)

Table 3.4-13: Emission Estimates for Toxic Air Contaminants Pollutants Using CT-EMFAC2017 (kilograms per day)

Revised:

Mobile sources and projected changes in VMT are based on transportation and land use forecasts developed using the MTC travel demand forecasting model, known as Travel Model 1.6, with the land use forecasting model, known as Bay Area UrbanSim 2.6. The integrated model produced the key outputs used in assessing the significance of transportation and air quality impacts, such as VMT. Based on this modeling, it is estimated that implementation of the proposed plan would result in a net increase in VMT (**Table 3.4-6 and Table 3.4-7**); however, as shown in **Table 3.4-11**, there would be a 47% decrease in diesel PM, a 50% decrease in 1,3- butadiene, and a 54% decrease in benzene compared to existing conditions. **Table 3.4-12** shows that, using CT-EMFAC2017 emissions reduction estimates, there would be a 15% decrease in diesel PM, a 14% decrease in 1,3-butadiene, and a 14% decrease in benzene compared to existing conditions.

…

Table 3.4-11: Emission Estimates for Toxic Air Contaminants Pollutants Using CT-EMFAC2021 (kilograms per day)

Table 3.4-11: Emission Estimates for Toxic Air Contaminants Pollutants Using CT-EMFAC2017 (kilograms per day)

Table 3.4-12, Table 3.4-13, and Table 3.4-14 have been renumbered and the corresponding text on page 3.4-57 of the Draft EIR has been revised as follows:

Original:

Because the proposed plan would result in a reduction in TAC emissions under both estimated emissions scenarios, as shown in **Table 3.4-12** and **Table 3.2-13**, there would be a less-than-significant impact (LTS).

…

Table 3.4-14 summarizes MTC's analysis results using EMFAC2021 emissions rates, expressed as a percentage change in TAC pollutants (diesel PM, benzene, and 1, 3 butadiene), $PM_{2.5}$ exhaust, and total PM2.5 emissions when compared to the base year emissions for each county with an Overburdened Community and the entire region.

Table 3.4-14: Percent Change in On-Road Mobile Source Exhaust and Total $PM_{2.5}$ Emissions, Years 2023–2050 (EMFAC2021)

Revised:

Because the proposed plan would result in a reduction in TAC emissions under both estimated emissions scenarios, as shown in **Table 3.4-11** and **Table 3.4-12**, there would be a less-than-significant impact (LTS).

…

Table 3.4-13 summarizes MTC's analysis results using EMFAC2021 emissions rates, expressed as a percentage change in TAC pollutants (diesel PM, benzene, and 1, 3 butadiene), $PM_{2.5}$ exhaust, and total PM2.5 emissions when compared to the base year emissions for each county with an Overburdened Community and the entire region.

Table 3.4-13: Percent Change in On-Road Mobile Source Exhaust and Total $PM_{2.5}$ Emissions, Years 2023–2050 (EMFAC2021)

Table 3.4-15 has been renumbered and the corresponding text on page 3.4-58 of the Draft EIR has been revised as follows:

Original:

Table 3.4-15 summarizes MTC's analysis results using the more conservative emissions rates from EMFAC2017, expressed as a percentage change in TAC pollutants (diesel PM, benzene, and 1, 3 butadiene), $PM_{2.5}$ exhaust, and total $PM_{2.5}$ emissions when compared to the base year emissions for each county with an Overburdened Community and the entire region.

Table 3.4-15: Percent Change in On-Road Mobile Source Exhaust and Total PM2.5 Emissions, Years 2023–2050 (EMFAC2017)

Revised:

Table 3.4-14 summarizes MTC's analysis results using the more conservative emissions rates from EMFAC2017, expressed as a percentage change in TAC pollutants (diesel PM, benzene, and

1, 3 butadiene), $PM_{2.5}$ exhaust, and total $PM_{2.5}$ emissions when compared to the base year emissions for each county with an Overburdened Community and the entire region.

Table 3.4-14: Percent Change in On-Road Mobile Source Exhaust and Total PM2.5 Emissions, Years 2023–2050 (EMFAC2017)

Table 3.4-12, Table 3.4-14, and Table 3.4-15 have been renumbered and the corresponding text on page 3.4-59 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 3.4-12**, reductions in TAC and $PM_{2.5}$ exhaust emissions are greater in Overburdened Communities than non-overburdened communities. However, **Table 3.4-14** shows that there would be a disproportionate increase in overall emissions of benzene, 1,3 butadiene, entrained road dust, and breaks and tire wear emissions in Overburdened Communities in comparison to increases of the same pollutants in the remainder of the region using EMFAC2021-based emissions estimates. **Table 3.4-15** shows disproportionate increases of the same pollutants in Overburdened Communities using EMFAC2017-based emissions estimates.

Revised:

As shown in **Table 3.4-11**, reductions in TAC and $PM_{2.5}$ exhaust emissions are greater in Overburdened Communities than non-overburdened communities. However, **Table 3.4-13** shows that there would be a disproportionate increase in overall emissions of benzene, 1,3 butadiene, entrained road dust, and breaks and tire wear emissions in Overburdened Communities in comparison to increases of the same pollutants in the remainder of the region using EMFAC2021-based emissions estimates. **Table 3.4-14** shows disproportionate increases of the same pollutants in Overburdened Communities using EMFAC2017-based emissions estimates.

In response to Comment A5-2, the following clarifications have been made to the air quality section on page 3.4-60 of the Draft EIR:

Original:

Sources contributing TAC and $PM_{2.5}$ emissions reductions in the 27-year timeframe (2023–2050) also include:

- street sweeping, potentially reducing road dust emissions by 10%;
- cleaner locomotive engines;
- the Bay Area Air District's Rule 11-18, which will potentially reduce TACs from the East Bay Municipal Utility District and Schnitzer Steel by an estimated 70%; and
- better enforcement and incentives discouraging backyard burning and limiting residential fuel combustion.

Revised:

Sources contributing TAC and $PM_{2.5}$ emissions reductions in the 27-year timeframe (2023–2050) also include:

- street sweeping, potentially reducing road dust emissions by 10%;
- cleaner locomotive engines;
- the Bay Area Air District's Rule 11-18, which will potentially reduce TACs from regulated facilities within several overburdened communities in the region; and

- better enforcement and incentives discouraging backyard burning and limiting residential fuel combustion.

Table 3.4-14 and Table 3.4-15 have been renumbered and the corresponding text on page 3.4-61 of the Draft EIR has been revised as follows:

Original:

Although exhaust-related emissions would decrease in both Overburdened Communities and non-Overburdened Communities, total $PM_{2.5}$ emissions would increase in the plan area as would total $PM_{2.5}$ emissions in the multiple Overburdened Communities (see **Table 3.4-14 and Table 3.4-15**, above).

Revised:

Although exhaust-related emissions would decrease in both Overburdened Communities and non-Overburdened Communities, total $PM_{2.5}$ emissions would increase in the plan area as would total $PM_{2.5}$ emissions in the multiple Overburdened Communities (see **Table 3.4-13 and Table 3.4-14**, above).

3.4 DRAFT EIR SECTION 3.5, "BIOLOGICAL RESOURCES

In response to Comment A5-3, the following clarifications have been made to the biological resources section on page 3.5-31 of the Draft EIR:

Original:

N/A

Revised:

East Bay Municipal Utility District Low Effect Habitat Conservation Plan

The East Bay Municipal Utility District (EBMUD) Low Effect Habitat Conservation Plan (HCP) covers maintenance activities on EBMUD 's 30,000 acres of watershed lands in the East Bay. The HCP was implemented in July of 2008 and has a 30-year permit term. EBMUD activities covered under the HCP include programs for water quality, biodiversity, forestry, livestock grazing, agricultural operations, fire and fuel management, recreation and developed trails, and the storage and removal of trench spoils. EB MUD 's HCP protects and enhances the natural ecosystems that support native species in the East Bay. The HCP covers seven species: four listed species and three that may be listed during the 30-year course of the plan. The HCP identifies existing vegetation communities, identifies covered species, and describes the measures EBMUD will employ to avoid impacts from operational activities on watershed lands. The HCP only covers activities on EBMUD East Bay watershed and does not provide coverage for maintenance or infrastructure projects within EBMUD 's 332 square mile service area.

In response to Comment A13-7, the following text has been removed from the biological resources section on pages 3.5-33 and 3.5-34 of the Draf EIR:

Original:

Bay Conservation and Development Commission Acts and Plans

Suisun Marsh Preservation Act of 1977 and Suisun Marsh Protection Plan

The Nejedly-Bagley-Z'berg Suisun Marsh Act was enacted in 1974 to require the San Francisco BCDC and CDFW to prepare a plan (later called the Suisun Marsh Protection Plan) to preserve the integrity and ensure continued wildlife use of the Suisun Marsh, approximately 85,000 acres of tidal marsh, managed wetlands, and waterways in southern Solano County. The Suisun Marsh is the largest remaining brackish wetland complex in San Francisco Bay, more than 10% of California's remaining wetland area, and a wildlife habitat of international importance. The Suisun Marsh Preservation Act (PRC Sections 29000–29612) was enacted in 1977 to incorporate the findings and policies contained in the Suisun Marsh Protection Plan of 1976 into State law, and to empower BCDC to implement the plan through its regulatory authority.

The Suisun Marsh Protection Plan, in brief, proposes (1) a primary management area encompassing the 89,000 acres of tidal marsh, managed wetlands, adjacent grasslands, and waterways over most of which BCDC now has jurisdiction and (2) a secondary management area of approximately 22,500 acres of significant buffer lands. Under specific guidelines in each area, Solano County would be responsible for preparing and administering a local protection program. BCDC would represent the State's interest, serving as the land use permitting agency for major projects in the primary management area, and as an appellate body with limited functions in the secondary management area.

San Francisco Bay Plan

The San Francisco Bay Plan (Bay Plan) was developed by BCDC in 1968, and its provisions are currently maintained and carried out by BCDC. Since the adoption of the Bay Plan, implementing legislation has been amended several times, but the general character, scope of authority, and area of jurisdiction are largely unchanged. The Bay Plan provides the findings and policies to guide future uses of the bay and shoreline, certain waterways, salt ponds and managed wetlands, and the maps that apply these policies to BCDC's jurisdiction.

Regional Shoreline Adaptation Plan

In 2023, Governor Newsom signed SB 272: Sea Level Rise Adaptation and Planning, which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with the targeted assistance of the State. The Regional Shoreline Adaptation Plan is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. This includes BCDC's guidelines for how local governments must meet the requirements of SB 272, including preparation of a Subregional Shoreline Adaptation Plan (Subregional Plan) by 2034.

Revised:

Text removed.

In response to Comment A13-3, Comment A13-4, and Comment A13-7, the following text has been added to the biological resources section on page 3.5-31 of the Draft EIR above the "Regional and Local Regulations" heading:

Original:

N/A

Revised:

Bay Conservation and Development Commission Acts and Plans

BCDC is a State planning and regulatory agency with permitting authority over San Francisco Bay, the Bay shoreline, and Suisun Marsh, as established in the McAteer-Petris Act, the Suisun Marsh Preservation Act and the Federal Coastal Zone Management Act. The following BCDC acts and plans are relevant to the proposed plan.

Suisun Marsh Preservation Act of 1977 and Suisun Marsh Protection Plan

The Nejedly-Bagley-Z'berg Suisun Marsh Act was enacted in 1974 to require the San Francisco BCDC and CDFW to prepare a plan (later called the Suisun Marsh Protection Plan) to preserve the integrity and ensure continued wildlife use of the Suisun Marsh, approximately 85,000 acres of tidal marsh, managed wetlands, and waterways in southern Solano County. The Suisun Marsh is the largest remaining brackish wetland complex in San Francisco Bay, more than 10% of California's remaining wetland area, and a wildlife habitat of international importance. The Suisun Marsh Preservation Act (PRC Sections 29000–29612) was enacted in 1977 to incorporate the findings and policies contained in the Suisun Marsh Protection Plan of 1976 into State law, and to empower BCDC to implement the plan through its regulatory authority.

The Marsh Act incorporated the findings and policies of the Suisun Marsh Protection Plan into State law and empowered BCDC to implement the Suisun Marsh Protection Plan through its regulatory authority. The Suisun Marsh Protection Plan establishes: (1) a Primary Management Area encompassing approximately 89,000 acres of tidal marsh, managed wetlands, adjacent grasslands, and waterways where BCDC has authority to issue Marsh Development Permits; and (2) a Secondary Management Area of approximately 22,500 acres of buffer lands where Solano County retains permitting jurisdiction and BCDC has some appellate authority. Under the SMPP, certain local entities are responsible for preparing and administering a local protection program, while BCDC serves as the land use permitting agency for development in the Primary Management Area and has review authority over local government permitting within the Secondary Management Area.

San Francisco Bay Plan

The San Francisco Bay Plan (Bay Plan) was developed by BCDC in 1968, and its provisions are currently maintained and carried out by BCDC. The Bay Plan guides BCDC's planning activities and its review of projects through its Regulatory program. BCDC cannot approve a permit for a project that is not consistent with the Bay Plan. The Bay Plan includes findings and policies that provide for protection of Bay resources, review of development proposals in BCDC's jurisdiction, and the design of public access. Under the McAteer-Petris Act, BCDC may amend the Bay Plan over time to address regional needs. The Bay Plan's policies are organized into several major categories including natural resources and environment (covering fish, other aquatic organisms and wildlife, water quality, tidal marshes and tidal flats, subtidal areas, and tributaries); development and use (addressing water-related industry, ports, transportation, recreation, and airports); shoreline protection and public access (guiding shoreline development, fill regulations, public access requirements, and appearance and design standards); and regional issues (including climate change, sea level rise adaptation, and Bay/watershed relationships). To minimize future filling of

the bay and protect waterfront land for water-dependent uses, the also uses Bay Plan identifies Priority Use Areas (PUAs), which reserve specific shoreline areas for particular water-oriented land uses. These water-oriented uses include ports, water-related industries, airports, wildlife refuges, water-oriented recreation and public assembly, desalinization plants, and power plants requiring large amounts of water for cooling purposes. The McAteer-Petris Act provides BCDC with the authority to designate and enforce these PUAs through its permitting program.

Regional Shoreline Adaptation Plan

In 2023, Governor Newsom signed SB 272: Sea Level Rise Adaptation and Planning, which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with the targeted assistance of the State. The Regional Shoreline Adaptation Plan is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. This includes BCDC's guidelines for how local governments must meet the requirements of SB 272, including preparation of a Subregional Shoreline Adaptation Plan (Subregional Plan) by 2034.

In response to Comment A18-8, the following clarifications have been made to the biological resources section on page 3.5-29 of the Draft EIR:

Original:

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act (Delta Reform Act) (California Water Code Section 10610 et seq.), also known as Senate Bill (SB) 1 (Stats. 2009, 7th Ex. Sess., ch. 5) (SB X7-1), one of several bills passed at that time related to water supply reliability, ecosystem health, and the Delta. The Delta Reform Act created the Delta Stewardship Council (DSC), charged with developing and adopting the Delta Plan. ...

...

The Delta Reform Act expressly provides that "covered actions" do not include (1)regional transportation plans, such as the proposed plan, and (2) plans, programs, projects, activities (and any infrastructure necessary to support those plans, programs, projects, or activities) within the secondary zone of the Delta that has been determined to be consistent with the proposed plan(California Water Code Section 85057.5). However, DSC reviews any plan that includes land within the Delta zones, whether or not it is a covered action. Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow a consultation procedure with DSC. This procedure includes early coordination to determine consistency of a proposed plan with the Delta Plan. MTC and ABAG consulted with DSC on December 12, 2019, and January 22, 2020 on the application of the law, the geography under DSC authority, and the policies established by the DSC, and will follow the Delta Reform Act's consultation requirements. ...

Revised:

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act (Delta Reform Act) (California Water Code Section 85000 et seq.), also known as Senate Bill (SB) 1 (Stats. 2009, 7th Ex. Sess., ch. 5) (SB X7-1), one of several bills passed at that time related to water supply reliability, ecosystem health, and the Delta. The Delta Reform Act created the Delta Stewardship Council (DSC), charged with developing and adopting the Delta Plan. ...

...

The Delta Reform Act expressly provides that "covered actions" do not include (1)regional transportation plans, such as the proposed plan, and (2) plans, programs, projects, activities (and

any infrastructure necessary to support those plans, programs, projects, or activities) within the secondary zone of the Delta that has been determined to be consistent with the proposed plan(California Water Code Section 85057.5). However, DSC reviews any plan that includes land within the Delta zones, whether or not it is a covered action. Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow a consultation procedure with DSC. This procedure includes early coordination to determine consistency of a proposed plan with the Delta Plan. MTC and ABAG consulted with DSC on October 19, 2023, on the application of the law, the geography under DSC authority, and the policies established by the DSC, and will follow the Delta Reform Act's consultation requirements. ...

In response to Comment O11-2, the following clarifications have been made to the description of the Regional Shoreline Adaptation Plan on pages 3.5-33 and 3.5-44 of the Draft EIR:

Original:

Regional Shoreline Adaptation Plan

In 2023, Governor Newsom signed SB 272: Sea Level Rise Adaptation and Planning, which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with the targeted assistance of the State. The Regional Shoreline Adaptation Plan is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. This includes BCDC's guidelines for how local governments must meet the requirements of SB 272, including preparation of a Subregional Shoreline Adaptation Plan (Subregional Plan) by 2034.

Revised:

Regional Shoreline Adaptation Plan

In 2023, Governor Newsom signed SB 272: Sea Level Rise Adaptation and Planning, which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with the targeted assistance of the State. The Regional Shoreline Adaptation Plan is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. This includes BCDC's guidelines for how local governments must meet the requirements of SB 272, including preparation of a Subregional Shoreline Adaptation Plan (Subregional Plan) by 2034. Subregional Plans must contain the following elements: planning process, existing conditions, vulnerability assessment, adaptation strategies and pathways, land use policy plan, project implementation and funding plan, and a project list (with increased detail and level of design).

3.5 DRAFT EIR SECTION 3.6, "CLIMATE CHANGE, GREENHOUSE GASES, AND ENERGY"

The following edits were made to text under "Operational Emissions" on page 3.6-36 of the Draft EIR as follows:

Original:

Operational Emissions

Land use emissions and motor vehicle emissions are evaluated differently, and thus, are explained separately. Land use emissions are qualitatively assessed whereas motor vehicle emissions are modeled using CARB's EMFAC2017 and EMFAC2021 models. For further explanation, please see the sections below, with further details available in Appendix D.

Revised:

Operational Emissions

Land use emissions and motor vehicle emissions are evaluated differently, and thus, are explained separately. Land use emissions are qualitatively assessed whereas motor vehicle emissions are modeled using CARB's EMFAC2021 model and the most current EMFAC2021 adjustment factors developed by CARB. For further explanation, please see the sections below, with further details available in Appendix D.

The following edits were made to text in the last two paragraphs on page 3.6-37 of the Draft EIR and the first two paragraphs on page 3.6-38 of the Draft EIR :

Original:

As identified in Section 3.6.2, "Regulatory Setting," several of California's waivers for mobile source regulations under the CAA have been rescinded following Congressional action. While the California Attorney General has filed lawsuits challenging P.L. No. 119-16 and P.L. No. 119-17, the implications of these laws on the State's capability to enforce its independent fuel economy standards are uncertain at this time because litigation is still pending. However, if P.L. No. 119-17 remains in place, GHG emissions in California will be substantially higher than if California continued to implement its own fuel economy standards under the CAA and in effect prior to the Congressional recission. CARB has not provided guidance, to date, on how to address these uncertainties in using its EMFAC modeling.

In an effort to account for a range of potential scenarios, depending on whether the ACC II regulation is enacted in the future, a range of mobile source emissions estimates were calculated for the proposed plan. Although the Bay Area Air District requested use of EMFAC2025, the most recently developed mobile source emissions model, in its response to the Notice of Preparation, MTC anticipates that this may result in underestimating future emissions if the recission remains. MTC anticipates that CARB will recommend off-model adjustments to EMFAC2021 to account for a scenario in which the recission remains in place, but no guidance has been issued at the time of this analysis. Therefore, older emissions models, which do not assume termination of gas engine vehicle sales by 2035, for instance, were used to determine project-related impacts. Emissions were calculated using both EMFAC2017 and EMFAC2021. Therefore, the analyses in this EIR do not account for ACC II because ACC II had not yet been adopted at the time the EMFAC2017 and EMFAC2021 methodologies were last updated and thus were not factored into the modeling. See Appendix D for details regarding the various state and federal laws, regulations, and legislative actions accounted for in EMFAC2017 and EMFAC2021. Because EMFAC2021 applies emissions reductions based on more recent mobile source emissions regulations, emissions calculated using EMFAC2021 are considered a less conservative estimate of emissions. Calculations made using EMFAC2017 provide a more conservative (higher level) estimate of emissions because EMFAC2017 includes emissions reduction estimates based on older, less stringent mobile-source emissions regulations. Notably, EMFAC2021 assumes implementation of the Low NOX rule and EIR mobile source emissions thus do not account for the June 12, 2025, disapproval of the Low NOX rule. Despite this, EMFAC2021 remains the current federally-approved model for estimating emissions in California and there is legal uncertainty regarding the enforceability of the federal disapproval of these regulations. Given these considerations, use of EMFAC2017 and EMFAC2021 to estimate a range of potential impacts are considered more conservative methodologies than relying on EMFAC2025, as requested by the Bay Area Air District, to calculate mobile source emissions. As stated above, it is anticipated that CARB will recommend adjustments to the EMFAC2021 model to account for the uncertainty in the regulatory landscape as it is related to transportation-related regulations. The range of emissions calculated using EMFAC2017 and

EMFAC2021 is intended to provide a range between which project-generated emissions estimated using the adjusted EMFAC2021 model would likely fall.

EMFAC2017 and EMFAC2021 generate emission factors for all types of on-road vehicles in different seasons and driving conditions. CARB developed these factors based on thousands of emissions tests on both new and used vehicles recruited randomly from the California fleet. In both EMFAC models, the emission rates were combined with vehicle activity data provided by regional transportation agencies (such as MTC) to calculate the regional emissions inventories.

Revised:

As identified in Section 3.6.2, "Regulatory Setting," several of California's waivers for mobile source regulations under the CAA have been rescinded following Congressional action. While the California Attorney General has filed lawsuits challenging P.L. No. 119-16 and P.L. No. 119-17, the implications of these laws on the State's capability to enforce its independent fuel economy standards are uncertain at this time because litigation is still pending. However, if P.L. No. 119-17 remains in place, GHG emissions in California will be substantially higher than if California continued to implement its own fuel economy standards under the CAA and in effect prior to the Congressional recission. In January 2026, CARB recommended adjustments to the EMFAC2021 model to account for the uncertainty in the regulatory landscape as it is related to transportation-related regulations. The EMFAC2021 emission rates were combined with vehicle activity data provided by regional transportation agencies (such as MTC) to calculate the regional emissions inventories used to inform the GHG analysis.

The following edits were made to text in the last two sentences on page 3.6-38 of the Draft EIR:

Original:

Fleet-average CO2 emission rates for the region for both 2023 and 2050 were developed using EMFAC2017 and EMFAC2021 to account for variability in the future regulatory landscape. Table 3.6-8 summarizes the levels of gasoline and diesel consumption for each year by vehicle category in the plan area using EMFAC2021 estimates.

Revised:

Fleet-average CO2 emission rates for the region for both 2023 and 2050 were developed using EMFAC2021 with the most current adjustment factors developed by CARB to account for variability in the future regulatory landscape. Table 3.6-8 summarizes the levels of gasoline and diesel consumption for each year by vehicle category in the plan area using EMFAC2021 estimates.

The text below Table 3.6-8 and Table 3.6-9 on page 3.6-39 of the Draft EIR have been removed:

Original:

Table 3.6-9 summarizes the levels of gasoline and diesel consumption for each year by vehicle category in the plan area using EMFC2017 estimates.

Table 3.6-9: Daily Levels of Gasoline and Diesel Consumption[1] (EMFAC2017)

Vehicle Category	2023 Gasoline (thousands gal/day)[2]	2023 Diesel (thousands gal/day)[2]	2023 Natural Gas (thousands gal/day)[2]	2050 Gasoline (thousands gal/day)[2]	2050 Diesel (thousands gal/day)[2]	2050 Natural Gas (thousands gal/day)[2]	Net Change gasoline (thousands gal/day)[2]	Net Change Diesel 9 thousands gal/day)[2]	Net Change Natural Gas (thousands gal/day)[2]
Passenger Vehicles	4,500	40	-	3,900	40	-	-590	1	-
Trucks	330	970	-	290	1,000	-	-30	40	-
Buses	30	70	-	20	70	-	-4	1	-

Vehicle Category	2023 Gasoline (thousands gal/day)[2]	2023 Diesel (thousands gal/day)[2]	2023 Natural Gas (thousands gal/day)[2]	2050 Gasoline (thousands gal/day)[2]	2050 Diesel (thousands gal/day)[2]	2050 Natural Gas (thousands gal/day)[2]	Net Change gasoline (thousands gal/day)[2]	Net Change Diesel 9 thousands gal/day)[2]	Net Change Natural Gas (thousands gal/day)[2]
Other Vehicles	40	3	-	40	3	-	2	0	-
All Vehicle Types	4,900	1,100	-	4,300	1,100	-	-630	50	0
Total Fuel		**6,000**			**5,400**			**-580**	

Notes: gal/day = gallons per day. 1 Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum due to independent rounding. 2 Gasoline and diesel consumption forecasts do not account for expected reductions from the implementation of Strategy EN8 or EN9.
Source: Data provided by MTC and ABAG in 2025; complied by Ascent in 2025.

Revised:

Text and table removed.

The following edits were made to the second to the last paragraph on page 3.6-41 of the Draft EIR:

Original:

As shown in **Table 3.6-10**, when these Pavley standards are considered using EMFAC2021 estimates, overall on-road vehicle GHG emissions would decline by 8% for passenger vehicles. Pavley standards only affect passenger vehicles, but emissions from trucks estimated using EMFAC2021 would decline by 18% while emissions from buses would decline by 55% due to adopted regulations, such as the ACT and Heavy Duty Omnibus regulations (CARB 2021d). Emissions from buses would decline by 4% due to adopted regulations, such as the ACT and Heavy Duty Omnibus regulations (CARB 2021d). Emissions from "other vehicles" would decrease by 1% when estimated using EMFAC2021.

Comparatively, as shown in Table 3.6-11, when Pavley standards are considered using EMFAC2017 estimates, overall on-road vehicle GHG emissions would decline by 13% for passenger vehicles. Pavley standards only affect passenger vehicles, but emissions from trucks estimated using EMFAC2017 would increase by 1% (likely due to omission of ACT-related reductions). Emissions from "other vehicles" would increase by 5% when estimated using EMFAC2017.

Revised:

As shown in **Table 3.6-9**, when these Pavley standards are considered using EMFAC2021 estimates, overall on-road vehicle GHG emissions would decline by 8% for passenger vehicles. Pavley standards only affect passenger vehicles, but emissions from trucks estimated using EMFAC2021 would increase by 17% while emissions from buses would decline by 46% due to adopted regulations, such as the ACT and Heavy Duty Omnibus regulations (CARB 2021d). Emissions from "other vehicles" would decrease by 1% when estimated using EMFAC2021.

The following edits were made to the tables and text on page 3.6-42 of the Draft EIR:

Original:

Table 3.6-10: Existing and Forecasted Daily Transportation GHG Emissions by Vehicle Source ($MTCO_2e$) (EMFC2021)

	2023	2050 Proposed Plan	Change from 2023	Percent change from 2023
Passenger Vehicles	43,300	39,700	-3,600	-8%

	2023	2050 Proposed Plan	Change from 2023	Percent change from 2023
Trucks	14,000	11,600	-2,500	-18%
Buses	910	410	-500	-55%
Other Vehicles	300	290	-4	-1%
Total	**58,600**	**52,000**	**-6,600**	**-11%**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG= greenhouse gas. Values include clean car standards. Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100, above 1,000,000 to the nearest 1,000). Figures may not sum due to independent rounding. Estimates calculated using EMFAC2021. MTC applied a ratio of 1:00:1:02 to all EMFAC2021 generated CO_2 estimates for conversion to CO_2e. Emissions were annualized by multiplying by 300 to take account for the fact that there is less traffic on weekends. Emission estimates do not account for expected reductions from the implementation of Strategy EN8 or EN9.
Source: Data provided by MTC and ABAG in 2025; complied by Ascent in 2025.

Table 3.6-11: Existing and Forecasted Daily Transportation GHG Emissions by Vehicle Source ($MTCO_2e$) (EMFC2017)

	2023	2050 Proposed Plan	Change from 2023	Percent change from 2023
Passenger Vehicles	39,300	34,200	-5,100	-13%
Trucks	12,700	12,900	180	1%
Buses	910	880	-40	-4%
Other Vehicles	350	360	20	5%
Total	**53,200**	**48,300**	**-4,900**	**-9%**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG= greenhouse gas. Values include clean car standards. Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum due to independent rounding. Estimates calculated using EMFAC2017. MTC applied a ratio of 1:00:1:02 to all EMFAC2017 generated CO2 estimates for conversion to CO2e. Emissions were annualized by multiplying by 300 to take account for the fact that there is less traffic on weekends. Emission estimates do not account for expected reductions from the implementation of Strategy EN8 or EN9. Source: Data provided by MTC and ABAG in 2025; complied by Ascent in 2025.

Emissions are reported on a regional basis, with respect to mobile sources. According to calculations performed using EMFAC2021, changes in transportation activity under the proposed plan would result in a net reduction of approximately 6,600 $MTCO_2e$/year, or 11%, from existing conditions to 2050, as shown in **Table 3.6-12**.

Table 3.6-12: Annual GHG Emissions from Projected Transportation Source ($MTCO_2e$/year) (EMFC2021)

	2023 Baseline	2035 Proposed Plan	2050 Proposed Plan	Change from Baseline to 2050	Percent change from Baseline to 2050
Transportation	58,600	n/a	52,000	-6,600	-11%

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent. Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum due to independent rounding. Emission estimates do not account for expected reductions from the implementation of Strategy EN2, EN3, EN8, or EN9. Source: Data provided by MTC and ABAG in 2025; complied by Ascent in 2025.

Comparatively, according to calculations performed using EMFAC2017 estimates, changes in transportation activity under the proposed plan would result in a new reduction of approximately 5,300 $MTCO_2e$, or 9%, from existing conditions to 2050, as shown in Table 3.6-13.

Revised:

Table 3.6-10 revised to Table 3.6-9: Existing and Forecasted Daily Transportation GHG Emissions by Vehicle Source ($MTCO_2e$) (EMFC2021 with CARB Adjustment Factors)

	2023	2050 Proposed Plan	Change from 2023	Percent change from 2023
Passenger Vehicles	43,300	39,700	-3,600	-8%
Trucks	14,000	16,400	2,400	17%
Buses	910	490	-520	-46%
Other Vehicles	300	290	-4	-1%
Total	**58,600**	**56,900**	**-1,700**	**-3%**

Notes: $MTCO_2e$ = metric tons of carbon dioxide equivalent; GHG= greenhouse gas. Values include clean car standards. Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100, above 1,000,000 to the nearest 1,000). Figures may not sum due to independent rounding. Estimates calculated using EMFAC2021. MTC applied a ratio of 1:00:1:02 to all EMFAC2021 generated CO_2 estimates for conversion to CO_2e. Emissions were annualized by multiplying by 300 to take account for the fact that there is less traffic on weekends. Emission estimates do not account for expected reductions from the implementation of Strategy EN8 or EN9.
Source: Data provided by MTC and ABAG in 2026; complied by Ascent in 2026.

Table 3.6-11 removed.

Emissions are reported on a regional basis, with respect to mobile sources. According to calculations performed using EMFAC2021, changes in transportation activity under the proposed plan would result in a net reduction of approximately 1,700 $MTCO_2e$/day, or 3%, from existing conditions to 2050, as shown in **Table 3.6-10**.

Table 3.6-12 revised to Table 3.6-10: Daily GHG Emissions from Projected Transportation Source ($MTCO_2e$/day) (EMFC2021 with CARB Adjustment Factors)

	2023 Baseline	2035 Proposed Plan	2050 Proposed Plan	Change from Baseline to 2050	Percent change from Baseline to 2050
Transportation	58,600	51,300	56,900	-1,700	-3%

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent. Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum due to independent rounding. Emission estimates do not account for expected reductions from the implementation of Strategy EN2, EN3, EN8, or EN9. Source: Data provided by MTC and ABAG in 2026; complied by Ascent in 2026.

The following edits were made to Table 3.6-13 and the text under "Conclusion" on page 3.6-43 of the Draft EIR:

Original:

Table 3.6-13: Annual GHG Emissions from Projected Transportation Source ($MTCO_2e$/year) (EMFC2017)

	2023 Baseline	2035 Proposed Plan	2050 Proposed Plan	Change from Baseline to 2050	Percent change from Baseline to 2050
Transportation	57,500	48,300	52,200	-5,300	-9%

Notes: GHG = greenhouse gas; $MTCO_2e$ = metric tons of carbon dioxide equivalent. Whole numbers have been rounded (between 0 and 10 to the nearest whole number, between 11 and 999 to the nearest 10, between 1,000 and 1,000,000 to the nearest 100). Figures may not sum due to independent rounding. Emission estimates do not account for expected reductions from the implementation of Strategy EN2, EN3, EN8, or EN9. Source: Data provided by MTC and ABAG in 2025; complied by Ascent in 2025.

Conclusion

The forecasted development pattern and transportation network improvements and programs of the proposed plan, combined with the implementation of federal and State regulations that would result in reduced GHG emissions from activities in the plan area, would lead to lower total GHG emissions in both 2035 and 2050 as compared to 2023. Notably, regional GHG emissions reductions would likely still occur in a scenario where the proposed plan is not implemented. This is due to the implementation of State and local regulations regarding GHG reductions across all sectors, which have created a statewide downward trend in GHG emissions. Therefore, it is foreseeable that regional GHG emissions would decrease as a result of statewide and local regulations.

As stated in "Method of Analysis," to provide a conservative estimate of emissions and associated impacts, this analysis bases its impact determinations on the most conservative emissions estimates calculated using EMFAC2017 and EMFAC2021. Therefore, it is conservatively assumed that daily emissions in 2050 with implementation of the proposed plan would be 4,900 $MTCO_2e$ (9%) less than daily emission estimated for the 2023 baseline (Table 3.6-11). It should be noted that while passenger vehicle emissions estimated using EMFAC2021 (Table 3.6-12) would be higher than those estimated using EMFAC2017 (Table 3.6-11), the emissions reductions calculated using EMFAC2017 remain the most conservative estimate of overall transportation-related GHG emissions under the plan due to lower overall reduction projections. Regarding annual emissions, with implementation of the proposed plan, annual emissions are estimated to be 5,900 $MTCO_2e$/year (9%) less than annual emissions estimated for the 2023 baseline (Table 3.6-13).

Implementation of the proposed plan is expected to result in a net reduction in GHG emissions in 2050 when compared to existing conditions. However, because construction emissions may not be reduced to net zero in all cases, this impact would be **potentially significant (PS)**. Mitigation Measure GHG-1 addresses this impact and is described below.

Revised:

Table 3.6-13 removed.

Conclusion

The forecasted development pattern and transportation network improvements and programs of the proposed plan, combined with the implementation of federal and State regulations that would result in reduced GHG emissions from activities in the plan area, would lead to lower total GHG emissions in 2050 as compared to 2023. Notably, regional GHG emissions reductions would likely still occur in a scenario where the proposed plan is not implemented. This is due to the implementation of State and local regulations regarding GHG reductions across all sectors, which have created a statewide downward trend in GHG emissions. Therefore, it is foreseeable that regional GHG emissions would decrease as a result of statewide and local regulations.

As shown in Table 3.6-9, daily emission in 2050 with implementation of the posed plan would be 1,700 $MTCO_2e$ (3%) less than daily emission estimated for the 2023 baseline. Implementation of the proposed plan is expected to result in a net reduction in GHG emissions in 2050 when compared to existing conditions. However, because construction emissions may not be reduced to net zero in all cases, this impact would be **potentially significant (PS)**. Mitigation Measure GHG-1 addresses this impact and is described below.

The following edits were made to the last paragraph on page 3.6-44 of the Draft EIR:

Original:

> The proposed plan would also result in the implementation of transportation projects. However, several strategies in the proposed plan would reduce emissions from cars and light-duty trucks. As shown in **Table 3.6-14**, Strategy EN8, "Expand Clean Vehicle Initiatives," includes strategies to support EV adoption and charging infrastructure, and Strategy EN9, "Expand Transportation Demand Management Initiatives," includes strategies that are expected to reduce vehicle trips and, subsequently, on-road passenger vehicle emissions by nearly 5,586 MTCO2 per day in 2035. As noted in the methodology, Travel Model 1.6 is not sensitive to the

Revised:

> The proposed plan would also result in the implementation of transportation projects. However, several strategies in the proposed plan would reduce emissions from cars and light-duty trucks. As shown in **Table 3.6-11**, Strategy EN8, "Expand Clean Vehicle Initiatives," includes strategies to support EV adoption and charging infrastructure, and Strategy EN9, "Expand Transportation Demand Management Initiatives," includes strategies that are expected to reduce vehicle trips and, subsequently, on-road passenger vehicle emissions by nearly 5,586 MTCO2 per day in 2035. As noted in the methodology, Travel Model 1.6 is not sensitive to the

Table 3.6-14 and Table 3.6-15 have been renumbered and the text after Table 3.6-14 has been edited on page 3.6-45 of the Draft EIR as follows:

Original:

> **Table 3.6-14: Plan Bay Area 2050 Strategy EN8: Clean Vehicle Initiatives and Strategy EN9: Transportation Demand Management Initiatives MTCO2 Reductions**
>
> **Table 3.6-15** shows the change in daily and per capita car and light-duty truck CO2 emissions between 2005 and 2035, the emissions reductions target year under SB 375. Emissions are expected to decline over time with and without the implementation of Strategy EN8 and Strategy EN9. With implementation of Strategy EN8 and Strategy EN9, the proposed plan is expected to result in a 21% decrease in per capita CO2 emissions from 2005 levels by 2035, exceeding the SB 375 target of 19%. While this decrease in emissions is attributable to numerous factors, the proposed plan's integrated land use and transportation strategies that result in a land use growth footprint that focuses growth into higher-density locations near transit services are particularly effective, as they encourage the shift from driving to public transit and active modes of transportation. This "focused growth" approach allows more efficient use of the existing transportation infrastructure. The integrated land use growth footprint and transportation strategies are described in greater detail in Chapter 2, "Project Description."
>
> **Table 3.6-15: Analysis of Passenger Vehicle and Light-Duty Truck CO2 Emissions Under SB 375[1]**

Revised:

> **Table 3.6-11: Plan Bay Area 2050 Strategy EN8: Clean Vehicle Initiatives and Strategy EN9: Transportation Demand Management Initiatives MTCO2 Reductions**
>
> **Table 3.6-12** shows the change in daily and per capita car and light-duty truck CO2 emissions between 2005 and 2035, the emissions reductions target year under SB 375. Emissions are expected to decline over time with and without the implementation of Strategy EN8 and Strategy EN9. With implementation of Strategy EN8 and Strategy EN9, the proposed plan is expected to result in a 21% decrease in per capita CO2 emissions from 2005 levels by 2035, exceeding the SB

375 target of 19%. While this decrease in emissions is attributable to numerous factors, the proposed plan's integrated land use and transportation strategies that result in a land use growth footprint that focuses growth into higher-density locations near transit services are particularly effective, as they encourage the shift from driving to public transit and active modes of transportation. This "focused growth" approach allows more efficient use of the existing transportation infrastructure. The integrated land use growth footprint and transportation strategies are described in greater detail in Chapter 2, "Project Description."

Table 3.6-12: Analysis of Passenger Vehicle and Light-Duty Truck CO2 Emissions Under SB 375[1]

The following edits were made to the first paragraph on page 3.6-47 of the Draft EIR:

Original:

As discussed under Impact GHG-1, implementation of the proposed plan would result in a net reduction in GHG emissions from transportation sources and would result in more efficient GHG emissions per capita because the projected land use growth footprint would accommodate a greater number of people in the plan area compared to existing conditions. As shown in **Table 3.6-15**, per capita transportation-related emissions are projected to decrease with implementation of the proposed plan, in accordance with SB 375. Additionally, the transportation network improvements and programs under the proposed plan would, in conjunction with the land use growth footprint, result in a regional reduction in per capita VMT for passenger and light-duty vehicles (see Section 3.15, "Transportation"). As stated in the 2022 Scoping Plan, decreasing per capita emissions, especially those related to VMT, is crucial to achieving the State's climate goals (CARB 2022a: 194).

Revised:

As discussed under Impact GHG-1, implementation of the proposed plan would result in a net reduction in GHG emissions from transportation sources and would result in more efficient GHG emissions per capita because the projected land use growth footprint would accommodate a greater number of people in the plan area compared to existing conditions. As shown in **Table 3.6-12**, per capita transportation-related emissions are projected to decrease with implementation of the proposed plan, in accordance with SB 375. Additionally, the transportation network improvements and programs under the proposed plan would, in conjunction with the land use growth footprint, result in a regional reduction in per capita VMT for passenger and light-duty vehicles (see Section 3.15, "Transportation"). As stated in the 2022 Scoping Plan, decreasing per capita emissions, especially those related to VMT, is crucial to achieving the State's climate goals (CARB 2022a: 194).

In response to Comment A7-2, the following revisions have been made to the air quality section on page 3.6-7 of the Draft EIR:

Original:

Sea Level Rise Projections

IPCC projects that global mean sea level rise will likely range from 11 to 22 inches (0.28 to 0.55 meters) by 2100 relative to 1995–2014. Global sea levels are expected to continue to rise for centuries to millennia due to continuing deep-ocean warming and ice-sheet melt and to remain elevated for thousands of years. Over the next 2,000 years, global mean sea level will rise by about 2 to 3 meters if warming is limited to 1.5°C, 2 to 6 meters if limited to 2°C, and 19 to 22 meters with 5°C of warming (IPCC 2021).

Statewide guidance has also been issued by the California Ocean Protection Council (OPC) to help the region prepare for sea level rise. The *State of California Sea-Level Rise Guidance Document: 2018 Update* (OPC Guidance) offers a series of projections for the State using a set of probability distributions. The OPC Guidance used IPCC projections as a starting point and includes the emissions scenarios; however, the absence of local projections and a lack of probabilities led to more localized projection analysis. The OPC Guidance specifies the projections of Kopp et. al 2014 as the best available for California. California projections are measured by emissions, time, and risk aversion. For 2050, the sea level rise projections are all still considered to be in a high emissions timeframe and range from 1.1 feet as the low risk-averse choice, 1.9 feet as the medium-high risk-averse choice, and 2.7 feet as the extreme risk-averse choice. The OPC Guidance projection referenced in the proposed plan comes from the projection that there is a 1-in-200 chance of exceeding 1.9 feet by the year 2050, characterizing this projection as a medium-high risk averse choice (OPC 2018). **Figure 3.6-3** presents the approximate medium-high risk projections for the region, including 24 inches representing sea level rise inundation by 2050, and 83 inches, or 7 feet, representing the sea level rise inundation projected by 2100. For more information on the document, see Section 3.6.2, "Regulatory Setting."

Sea Level Rise in San Francisco Bay

Overall sea level rise projections in the Bay Area were developed using two map sets. BCDC's Adapting to Rising Tides program has developed county-specific analyses of sea level rise projects for the nine Bay Area counties: Alameda, Contra Costa, Marin, Napa, San Mateo, San Francisco, Santa Clara, Solano, and Sonoma (BCDC 2021). Sea level rise projections for coastal areas outside of the San Francisco Bay were based on the National Oceanic and Atmospheric Administration (NOAA) Coastal Service Center's sea level rise inundation maps for the San Francisco Bay Area in 2023. Both maps depict sea level rise relative to a mean higher high-water condition in the San Francisco Bay. **Table 3.6-4** presents NOAA and BCDC sea level rise inundation information with 24 inches of sea level rise based on the OPC Guidance for 2050.

Revised:

Sea Level Rise Projections

The State of California Ocean Protection Council projects that global mean sea level rise will likely range from 1.6 to 3.1 feet by 2100 relative to 1995–2014. Global sea levels are expected to continue to rise for centuries to millennia due to continuing deep-ocean warming and ice-sheet melt and to remain elevated for thousands of years. Over the next 2,000 years, global mean sea level will rise by about 2 to 3 meters if warming is limited to 1.5°C, 2 to 6 meters if limited to 2°C, and 19 to 22 meters with 5°C of warming (IPCC 2021). The California Ocean Protection Council (OPC) offers statewide guidance to help the region prepare for sea level rise. The State of California Sea-Level Rise Guidance Document: 2024 Science and Policy Update (OPC Guidance) includes five sea level rise scenarios derived from the sets of probabilistic projections developed in the Intergovernmental Panel on Climate Change Sixth Assessment report (IPCC AR6), which reflect the most up to date scientific understanding of the physical drivers of sea level rise (OPC 2024). California projections are measured by emissions, time, and exceedance probabilities. For 2050, the Bay Area sea level rise projections using the San Francisco tidal gauge range from 0.6 feet for an intermediate-low scenario, ~~1.9~~ 1.0 feet as the intermediate-high scenario, and 1.3 feet as the high scenario.

Sea level rise mapping across the outer coast, bay, and delta are only available at coarse height intervals. Plan Bay Area 2050+ uses 1.6 feet of permanent inundation by the year 2050 as the closest available data point above the OPC 2024 Guidance's 2050 high scenario. Figure 3.6-3 presents the 1.6ft, 2050 projections for the region. For more information on the document, see Section 3.6.2, "Regulatory Setting."

Sea Level Rise in San Francisco Bay

Overall sea level rise projections in the Bay Area were developed using two map sets. The US Geological Survey Coastal Storm Modeling System for the outer coast and bay, as well as the Delta Stewardship Council's Delta Adapts Flood Hazard Assessment. The USGS dataset shows flooding with 50 centimeters or 1.6 feet, while the Delta Stewardship Council reflects 2 feet of flooding. Both maps depict sea level rise relative to a mean higher high-water condition. Table 3.6-4 presents NOAA and BCDC sea level rise inundation information with 1.6 feet of sea level rise.

In response to Comment A13-7, the following text has been removed from the climate change, greenhouse gases, and energy section on page 3.6-33 of the Draf EIR:

Original:

Regional and County Sea Level Rise Programs San Francisco Bay Plan

BCDC is charged with the protection, enhancement, and responsible use of the San Francisco Bay. The agency's jurisdiction includes the bay itself, all land within 100 feet of the bay shoreline, salt ponds, managed wetlands, and certain waterways named in BCDC's law. BCDC guides uses of the bay and its shoreline through policies set forth in the McAteer-Petris Act; the Suisun Marsh Preservation Act; the San Francisco Bay Plan, originally adopted in 1968; and the Suisun Marsh Protection Plan, originally adopted in 1977. The policies included in BCDC's San Francisco Bay Plan address the uses of both the bay and shoreline, water quality, and the approach to bay fill. Additionally, the San Francisco Bay Plan has a number of proposals, including the development of ports, land preservation, development of parks and recreation, maintaining wildlife, and managing shipping channels. In 2019, BCDC amended its San Francisco Bay Plan to allow for more substantial fill when addressing sea level rise with multi-benefit adaptation projects, as well as added an Environmental Justice and Social Equity Amendment establishing new equity-focused requirements for project sponsors (BCDC 2020).

As required by SB 272 (discussed above), BCDC published the RSAP in December of 2024. The RSAP supports local governments and communities in the Bay Area in addressing coastal flood hazard risks through coordinated and consistent adaptation planning and implementation. The RSAP prioritizes establishing a regional vision for successful sea level rise adaptation, aligning regional and local priorities, reducing flood risk by improving multijurisdictional coordination, and standardizing and simplifying adaptation methods and data (BCDC 2024).

Revised:

Text removed.

In response to Comment A13-6 and Comment A13-7, the following text has been added to the climate change, greenhouse gases, and energy section on page 3.6-30 of the Draf EIR above the "Regional and Local Regulations" heading:

Original:

N/A

Revised:

San Francisco Bay Plan

BCDC is charged with the protection, enhancement, and responsible use of the San Francisco Bay. The agency's jurisdiction includes the bay itself, all land within 100 feet of the bay shoreline, salt ponds, managed wetlands, and certain waterways named in BCDC's law. BCDC guides uses of the bay and its shoreline through policies set forth in the McAteer-Petris Act; the Suisun Marsh

Preservation Act; the San Francisco Bay Plan, originally adopted in 1968; and the Suisun Marsh Protection Plan, originally adopted in 1977. The policies included in BCDC's San Francisco Bay Plan address the uses of both the bay and shoreline, water quality, and the approach to bay fill. Additionally, the San Francisco Bay Plan has a number of proposals, including the development of ports, land preservation, development of parks and recreation, maintaining wildlife, and managing shipping channels. In 2019, BCDC amended its San Francisco Bay Plan to allow for more substantial fill when addressing sea level rise with multi-benefit adaptation projects, as well as added an Environmental Justice and Social Equity Amendment establishing new equity-focused requirements for project sponsors (BCDC 2020).

As required by SB 272 (discussed above), BCDC published the RSAP in December of 2024. The RSAP supports local governments and communities in the Bay Area in addressing coastal flood hazard risks through coordinated and consistent adaptation planning and implementation. The RSAP establishes a regional vision for successful sea level rise adaptation, aligns regional and local priorities, reduces flood risk by improving multijurisdictional coordination, and standardizes and simplifies adaptation methods and data (BCDC 2024).

In response to Comment A8-4, the following revision has been made to the climate change, greenhouse gases, and energy section on page 3.6-32 of the Draft EIR:

Original:

Although not required, a majority of jurisdictions in the region participate in the creation of both emissions inventories and CAPs. Consistent with CARB recommendations, several Bay Area jurisdictions have completed community emissions inventories (105), and 89 jurisdictions have finalized and adopted community CAPs, as shown in **Table 3.6-7**. There are also jurisdictions that have drafted or are in the process of drafting CAPs that are not included in **Table 3.6-7**.

Revised:

Although not required, a majority of jurisdictions in the region participate in the creation of both emissions inventories and CAPs. Consistent with CARB recommendations, several Bay Area jurisdictions have completed community emissions inventories (105), and 89 jurisdictions have finalized and adopted community CAPs, as shown in **Table 3.6-7**. There are also jurisdictions that have drafted or are in the process of drafting CAPs that are not included in **Table 3.6-7**. CARB developed an open data tool to recognize local government climate action planning efforts across the state. Information regarding the open data tool can be found in the CARB's Climate Action Planning page: https://ww2.arb.ca.gov/our-work/programs/local-actions-climate-change/climate-action-planning.

In response to Comment O11-5, the following addition has been made to the climate change, greenhouse gases, and energy section on page 3.6-33 of the Draft EIR:

Original:

As required by SB 272 (discussed above), BCDC published the RSAP in December of 2024. The RSAP supports local governments and communities in the Bay Area in addressing coastal flood hazard risks through coordinated and consistent adaptation planning and implementation. The RSAP prioritizes establishing a regional vision for successful sea level rise adaptation, aligning regional and local priorities, reducing flood risk by improving multijurisdictional coordination, and standardizing and simplifying adaptation methods and data (BCDC 2024).

Revised:

As required by SB 272 (discussed above), BCDC published the RSAP in December of 2024. The RSAP supports local governments and communities in the Bay Area in addressing coastal flood hazard risks through coordinated and consistent adaptation planning and implementation. The RSAP prioritizes establishing a regional vision for successful sea level rise adaptation, aligning regional and local priorities, reducing flood risk by improving multijurisdictional coordination, and standardizing and simplifying adaptation methods and data (BCDC 2024). The RSAP Atlas Open Data[1] portal provides GIS data that can be used by local governments for incorporation into subregional shoreline adaptation plans.

[1] https://rsap-open-data-bcdc.hub.arcgis.com/

In response to Comment O11-6, the following addition has been made to the climate change, greenhouse gases, and energy section on page 3.6-35 of the Draft EIR, before the "Energy" heading:

Original:

N/A

Revised:

San Francisco Estuary Institute Baylands Resilience Framework

The San Francisco Estuary Institute (SFEI) is an independent aquatic and estuary science research institute that provides scientific research, data, and tools to support planning, designing, and decision-making related to the San Francisco Bay and its shoreline. SFEI conducts research to assess and improve the health of the Bay's waters, wetlands, wildlife, and landscapes. The institute also develops technical resources used by public agencies and other stakeholders.

SFEI's Baylands Resilience Framework[1] is a regional, science-based tool that provides quantitative data to help planners and resource managers understand where adaptation and restoration projects can increase the resilience of baylands to sea level rise. The Framework includes resilience metrics available through an interactive web map and a Resilience Metrics Mapbook[2], which illustrate potential nature-based solutions that can be implemented within different landscape units and the types of community and ecosystem resilience benefits that may be achieved. The Baylands Resilience Framework is an informational resource and does not establish regulatory requirements.

[1] https://www.sfei.org/projects/baylands-resilience-framework

[2] https://www.sfei.org/documents/san-francisco-baylands-resilience-metrics-mapbook

3.6 DRAFT EIR SECTION 3.9, "HAZARDS AND WILDFIRE"

In response to Comment A7-4, the following revisions have been made to the hazards and wildfire section on page 3.9-5 of the Draft EIR:

Original:

Asbestos is not a formal mineralogical term, but rather a commercial and industrial term historically applied to a group of silica-containing minerals that form long, very thin mineral fibers (termed amphiboles), which generally form in bundles, that were once widely used in commercial products.

Revised:

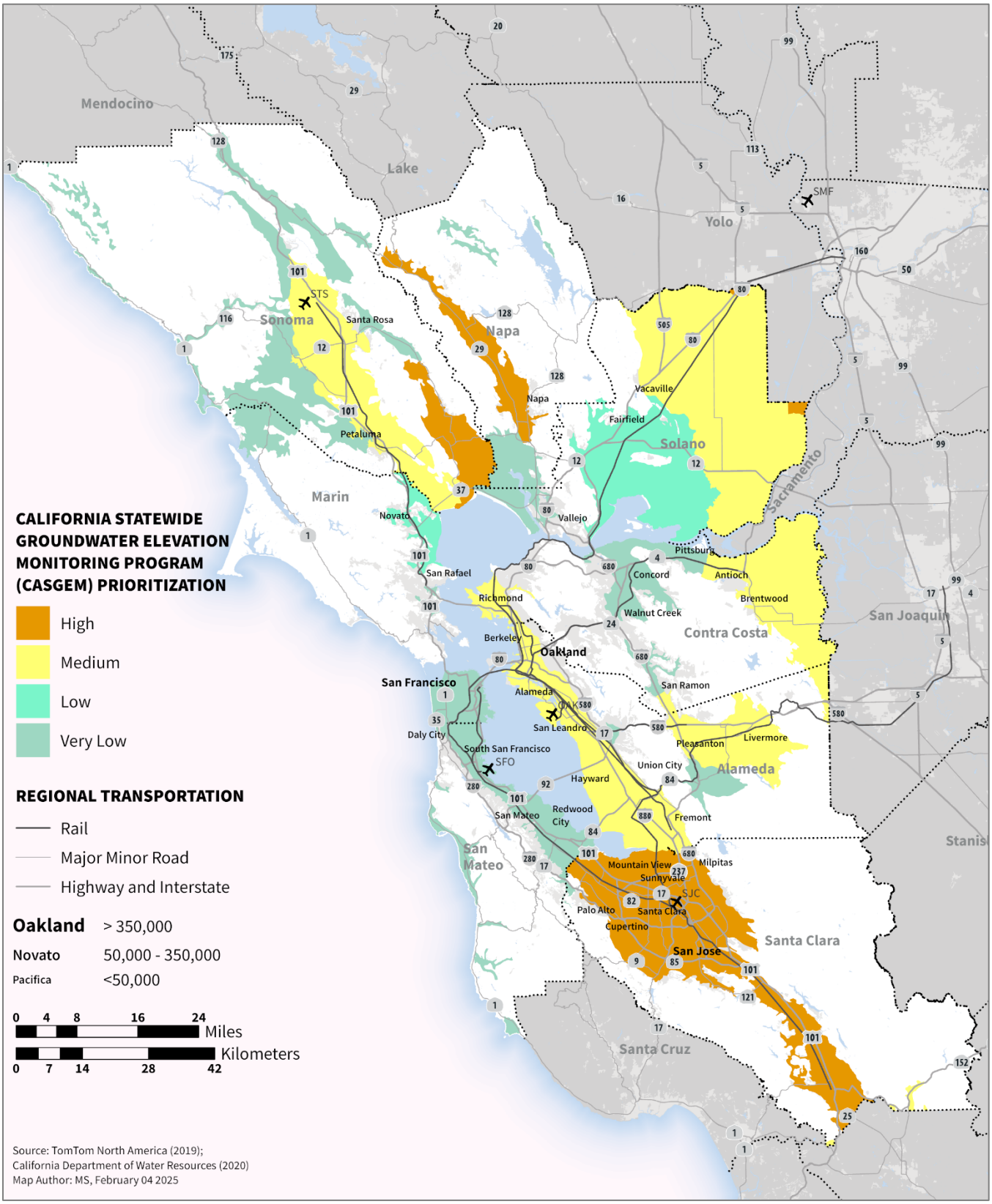
The primary mineral groups for asbestos are amphibole and serpentine (chrysotile). Each species of these groups has a distinct crystal structure. Amphiboles are common silicate minerals found in many types of rocks. Although most occurrences of amphibole are non-asbestiform, some asbestiform amphiboles were used in commercial products. Serpentine asbestos was also commonly used in commercial products

3.7 DRAFT EIR SECTION 3.10, "HYDROLOGY AND WATER QUALITY"

In response to Comment A7-5, the following revision has been made to Figure 3.10-4 on page 3.10-15 of the hydrology and water quality section of the Draft EIR:

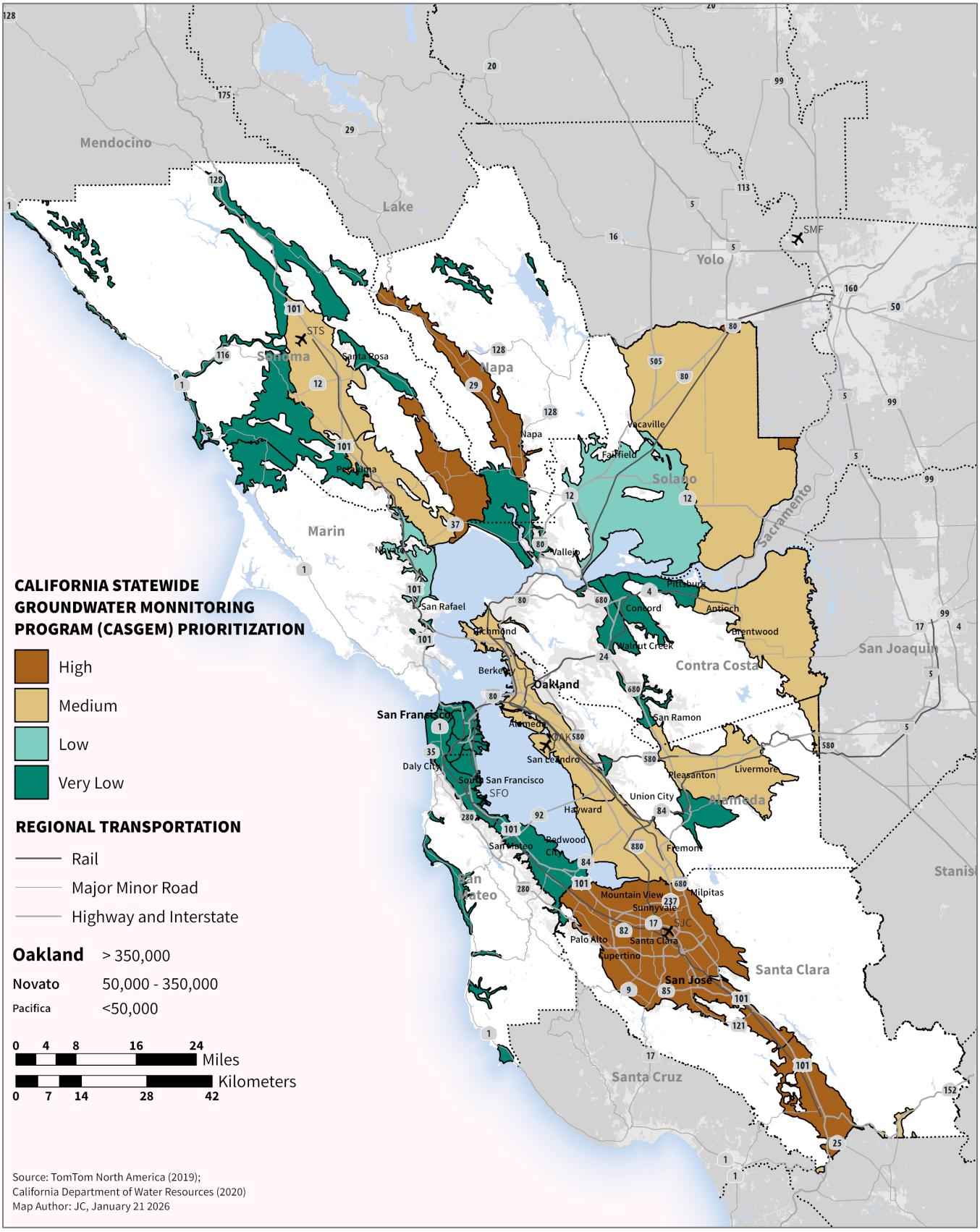
Original:

Figure 3.10-4: Groundwater Basin Prioritization



Sources: Figure provided by MTC and ABAG, adopted by Ascent in 2025.

Revised:



Source: TomTom North America (2019); California Department of Water Resources (2020)
Map Author: JC, January 21 2026

Sources: Figure provided by MTC and ABAG, adopted by Ascent in 2026.

In response to Comment A13-3, the following revision has been made to the hydrology and water quality section on page 3.10-21 of the Draft EIR:

Original:

Senate Bill 272

California Senate Bill (SB) 272, "Sea Level Rise Planning and Adaptation," was signed into law on October 7, 2023. SB 272 requires local governments that are within or partially within the state's coastal zone or the jurisdiction of the San Francisco Bay Conservation and Development Commission (BCDC), respectively, to develop Local Coastal Programs or Subregional Shoreline Adaptation Plans. SB 272 requires BCDC to create guidelines for the preparation of these plans within the San Francisco Bay Area and gives BCDC the authority to approve or deny plans based on consistency with these guidelines. Local governments that receive approval from the Coastal Commission or BCDC will be prioritized for funding for the implementation of sea level rise adaptation strategies and recommended projects in the approved plan. These plans are intended to be used by cities and counties to protect their residents, neighborhoods, communities, infrastructure, and habitats from sea level rise on the bay shoreline and on the outer coast.

Revised:

Senate Bill 272

California Senate Bill (SB) 272, "Sea Level Rise Planning and Adaptation," was signed into law on October 7, 2023. SB 272 requires local governments that are within or partially within the state's coastal zone or the jurisdiction of the San Francisco Bay Conservation and Development Commission (BCDC), respectively, to develop Local Coastal Programs or Subregional Shoreline Adaptation Plans by January 1, 2034. SB 272 requires BCDC to create guidelines for the preparation of these plans within the San Francisco Bay Area and requires BCDC to approve or deny plans based on consistency with these guidelines. Projects and strategies contained in local government plans that receive approval from the Coastal Commission or BCDC will be prioritized for funding for the implementation of sea level rise adaptation strategies and recommended projects in the approved plan. These plans are intended to be used by cities and counties to protect their residents and communities from sea level rise and flooding hazards while promoting equitable and sustainable adaptation strategies

In response to Comment A13-7, the following text has been removed from the hydrology and water quality section on page 3.10-21 of the Draft EIR under the "Regional and Local Regulations" heading:

Original:

McAteer-Petris Act/San Francisco Bay Conservation and Development Commission

The McAteer-Petris Act is a provision under California law that preserves San Francisco Bay from indiscriminate filling. It established the BCDC as the agency charged with preparing a plan for the longterm use of the bay and regulating development in and around the bay while the plan was being prepared. The San Francisco Bay Plan, completed in January 1969, includes policies on 18 issues critical to the wise use of the bay, ranging from ports and public access to design considerations and weather. The McAteerPetris Act authorizes BCDC to incorporate the policies of the bay plan into State law. The bay plan has two features: policies to guide future uses of the bay and shoreline, and maps that apply these policies to the bay and shoreline.

The BCDC Regional Shoreline Adaptation Plan (RSAP) was developed in response to SB 272 (described under "State Regulations" above) and is a component of the San Francisco Bay Plan. The RSAP is a guidance document that supports the Bay Area's local governments and

communities in addressing the risks of coastal flood hazards through coordinated and consistent adaptation planning and implementation. The RSAP includes guidelines that promote safe, sustainable, and strategic shoreline growth and density in areas that are resilient to coastal sea level rise and inland groundwater rise (BCDC 2024).

Revised:

Text removed.

In response to Comment A13-3 and Comment A13-7, the following text has been added to the hydrology and water quality section on page 3.10-21 of the Draft EIR above the "Regional and Local Regulations" heading:

Original:

N/A

Revised:

McAteer-Petris Act/San Francisco Bay Conservation and Development Commission

The McAteer-Petris Act, passed in 1965, is the California state law that created BCDC and established its regulatory authority over San Francisco Bay (Codified in California Government Code Sections 66600-66661). It grants BCDC the authority to grant or deny permits for any proposed fill; extraction of materials; or substantial changes in use of any water, land, or structure within the Commission's jurisdiction (Government Code Section 66632). Additionally, BCDC establishes land use policies for the Bay as a resource and for development of the Bay and shoreline in the San Francisco Bay Plan, which provides the basis for the Commission's review and actions on proposed projects.

The BCDC Regional Shoreline Adaptation Plan (RSAP) was developed in response to SB 272 (described above) and is a component of the San Francisco Bay Plan. The RSAP is a guidance document that supports the Bay Area's local governments and communities in addressing the risks of coastal flood hazards through coordinated and consistent adaptation planning and implementation. The RSAP includes guidelines that promote safe, sustainable, and strategic shoreline growth and density in areas that are resilient to coastal sea level rise and inland groundwater rise (BCDC 2024).

In response to Comment A13-4 and Comment A13-8, the following text has been added to the hydrology and water quality section on page 3.10-21 of the Draft EIR, before the "Regional and Local Regulations," heading:

Original:

N/A

Revised:

San Francisco Bay Plan

The San Francisco Bay Plan (Bay Plan) is BCDC's comprehensive plan for the San Francisco Bay and its shoreline. The Bay Plan guides BCDC's planning activities and its review of projects through its Regulatory program. BCDC cannot approve a permit for a project that is not consistent with the Bay Plan. The Bay Plan includes findings and policies that provide for protection of Bay resources, review of development proposals in BCDC's jurisdiction, and the design of public access.

Under the McAteer-Petris Act, BCDC may amend the Bay Plan over time to address regional needs. The Bay Plan's policies are organized into several major categories including natural resources and environment (covering fish, other aquatic organisms and wildlife, water quality, tidal marshes and tidal flats, subtidal areas, and tributaries); development and use (addressing water-related industry, ports, transportation, recreation, and airports); shoreline protection and public access (guiding shoreline development, fill regulations, public access requirements, and appearance and design standards); and regional issues (including climate change, sea level rise adaptation, and Bay/watershed relationships). To minimize future filling of the bay and protect waterfront land for water-dependent uses, the also uses Bay Plan identifies Priority Use Areas (PUAs), which reserve specific shoreline areas for particular water-oriented land uses. These water-oriented uses include ports, water-related industries, airports, wildlife refuges, water-oriented recreation and public assembly, desalinization plants, and power plants requiring large amounts of water for cooling purposes. The McAteer-Petris Act provides BCDC with the authority to designate and enforce these PUAs through its permitting program.

3.8 DRAFT EIR SECTION 3.11, "LAND USE, POPULATION, AND HOUSING"

In response to Comment A13-7, the following text has been removed from the land use, population, and housing section on pages 3.11-17 and 3.11-18 of the Draf EIR:

Original:

San Francisco Bay Area Seaport Plan

The San Francisco Bay Conservation and Development Commission (BCDC) developed the San Francisco Bay Area Seaport Plan in 1996, last amended in 2012, to forecast cargo activity, assess port terminal handling capacity, and coordinate port area development. The plan assists in coordinating Bay Area maritime activities with the region's surface transportation system. The plan uses Port Priority Use Areas as a land use designation for port development planning and establishing policies to achieve goals for the port system and surrounding areas. However, the projections and plan horizon was 2020, and BCDC is in the process of updating the plan.

BCDC Regional Shoreline Adaptation Plan

The BCDC Regional Shoreline Adaptation Plan (RSAP), developed in response to SB 272 (2023), is a component of the Bay Plan that provides guidance on land use planning in areas vulnerable to sea level rise. The RSAP is designed to support Bay Area local governments and communities in integrating shoreline adaptation strategies into their land use plans, zoning, and development regulations. It promotes safe, sustainable, and strategic shoreline growth, ensuring that future development in areas subject to coastal and groundwater rise is resilient and aligned with regional adaptation efforts.

The RSAP guidelines emphasize the importance of incorporating nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. Local jurisdictions within BCDC's jurisdiction must consider RSAP guidance when developing or updating their general plans, Local Coastal Programs (LCPs), and zoning codes to ensure consistency with regional adaptation priorities (BCDC 2024).

Revised:

Text removed.

In response to Comment A13-5 and Comment A13-7, the following text has been added to the land use, population, and housing section on page 3.11-14 of the Draf EIR above the "Regional and Local Regulations" heading:

Original:

N/A

Revised:

San Francisco Bay Area Seaport Plan

The Seaport Plan, originally adopted in 1982, is part of the San Francisco Bay Plan (Bay Plan) and is used by BCDC to help guide its regulatory decisions on permit applications, consistency determinations, and related matters. Its primary purpose is to designate and reserve Port Priority Use Areas along the Bay shoreline for existing and future maritime cargo operations, thereby coordinating port terminal development across the region and minimizing the need for new Bay fill. The plan was most recently updated in November 2023 with assistance from a wide variety of stakeholders, including MTC and ABAG, and includes a cargo forecast through 2050 and addresses key issues including climate change adaptation, environmental justice, and regional coordination to ensure the Bay Area maintains sufficient seaport capacity to meet future waterborne cargo needs.

BCDC Regional Shoreline Adaptation Plan

The BCDC Regional Shoreline Adaptation Plan (RSAP), developed in response to SB 272 (2023) and adopted by BCDC in 2024 as part of the Bay Plan, is a region-wide plan for the San Francisco Bay shoreline that guides the creation of coordinated locally planned sea level rise adaptation actions that work together to achieve a regional One Bay Vision. The which requires local governments across the California coast and San Francisco Bay plan for adaptation to rising sea levels with targeted financial assistance from the State. The RSAP includes BCDC's guidelines for local governments within BCDC's jurisdiction to prepare a Subregional Shoreline Adaptation Plan (Subregional Plan) by the legislative deadline of 2034.

The RSAP guidelines support local governments and communities in integrating shoreline adaptation strategies into their land use plans, zoning, development regulations and capital projects. The guidelines also emphasize the importance of incorporating nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. It promotes safe, sustainable, and strategic shoreline growth, ensuring that future development in areas subject to coastal and groundwater rise is resilient and aligned with regional adaptation efforts.

In response to Comment A13-7, the following revision has been made to the land use, population, and housing section on page 3.11-4 of the Draft EIR:

Original:

The coastal zone established by the California Coastal Act does not include San Francisco Bay, where development is regulated by BCDC. More information on how these agencies regulate uses near the coast is addressed in the Section 3.11.3, "Regulatory Setting," below.

Revised:

> The coastal zone established by the California Coastal Act does not include San Francisco Bay, where development is regulated by BCDC. BCDC's jurisdiction is established by the McAteer Petris Act and includes, among other types, the San Francisco Bay itself, certain waterways, and a line 100 feet landward of and parallel with the shoreline known as the "Shoreline Band," which is described in greater detail in Government Code Section 66610. More information on how these agencies regulate uses near the coast is addressed in the Section 3.11.3, "Regulatory Setting," below.

In response to Comment A13-7, the following revision has been made to the land use, population, and housing section on page 3.11-13 of the Draft EIR:

Original:

> To minimize the future filing of the bay, the Bay Plan identifies Priority Use Areas (PUAs), which are reserved for these water-oriented land uses. It is necessary to obtain BCDC approval before undertaking any work within 100 feet of the bay shoreline (including grading); filling of the bay or certain tributaries of the bay; dredging; Suisun Marsh projects; and any filling, new construction, major remodeling, substantial change in use, and many land subdivisions in the bay, along the shoreline, in salt ponds, duck hunting preserves or other managed wetlands adjacent to the bay.

Revised:

> To minimize future filling of the bay and protect waterfront land for water-dependent uses, the Bay Plan identifies Priority Use Areas (PUAs), which reserve specific shoreline areas for particular water-oriented land uses. These water-oriented uses include ports, water-related industries, airports, wildlife refuges, water-oriented recreation and public assembly, desalinization plants, and power plants requiring large amounts of water for cooling purposes. The McAteer-Petris Act provides BCDC with the authority to designate and enforce these PUAs through its permitting program.

In response to Comment O11-31, the second paragraph on page 3.11-17 has been revised as follows:

Original:

> The RSAP guidelines emphasize the importance of incorporating nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. Local jurisdictions within BCDC's jurisdiction must consider RSAP guidance when developing or updating their general plans, Local Coastal Programs (LCPs), and zoning codes to ensure consistency with regional adaptation priorities (BCDC 2024).

Revised:

> The RSAP guidelines emphasize the importance of incorporating natural and nature-based solutions, coordinated land use planning across jurisdictions, and phased adaptation strategies to accommodate future changes in sea level and storm surge risks. Local jurisdictions within BCDC's jurisdiction must consider RSAP guidance when developing or updating their general plans, Local Coastal Programs (LCPs), and zoning codes to ensure consistency with regional adaptation priorities (BCDC 2024).

A staff-initiated edit has been added to Section 3.11.3, "Regulatory Setting," under state regulation after "Senate Bill 272 (2023)" on page 3.11-11. The addition does not alter the conclusions of the EIR with respect to the significance of impacts or substantially change the severity of significant impacts.

Original:

N/A

Added:

Senate Bill 79

SB 79 was signed into law by Governor Newsom on October 10, 2025 and will become effective on July 1, 2026. SB 79 allows qualified transit-oriented housing developments to occur on sites zoned for residential, mixed-use, or commercial development that are located near specified transit stops in counties with more than 15 passenger rail stations. In the Bay Area, eligible counties include San Francisco, Alameda, San Mateo, and Santa Clara. In addition, SB 79 sets statewide standards for height, density, and residential floor area ratios for such housing developments, which vary based on how close a project is to the stop and how the stop is classified.

3.9 DRAFT EIR SECTION 3.13, PUBLIC SERVICES AND RECREATION

In response to Comment A13-7, the following text has been removed from the public services and recreation section on page 3.13-10 of the Draft EIR:

Original:

Regional Shoreline Adaptation Plan

The BCDC Regional Shoreline Adaptation Plan (RSAP) is a guidance document that supports the Bay Area's local governments and communities in addressing the risks of coastal flood hazards through coordinated and consistent adaptation planning and implementation. One of BCDC's primary functions as a coastal zone management agency is to protect, preserve, and increase public access to the bay to the maximum extent feasible. The RSAP identifies the threat of sea level rise to public uses and recreation along the shoreline, including parks, trails, boat launches, marinas, and other public shoreline access points. One of the strategic regional priorities of the RSAP is to provide equitable connected regional shoreline access that balances the need for human enjoyment, sustenance, and cultural connection to the bay with healthy ecosystems (BCDC 2024).

Revised:

Text removed.

In response to Comment A13-7, the following text has been added to the public services and recreation section on page 3.13-9 of the Draft EIR above the "Regional and Local Regulations" heading:

Original:

N/A

Revised:

BCDC Regional Shoreline Adaptation Plan

The BCDC Regional Shoreline Adaptation Plan (RSAP) is a guidance document that supports the Bay Area's local governments and communities in addressing the risks of coastal flood hazards

through coordinated and consistent adaptation planning and implementation. One of BCDC's primary functions as a coastal zone management agency is to protect, preserve, and increase public access to the bay to the maximum extent feasible. The RSAP identifies the threat of sea level rise to public uses and recreation along the shoreline, including parks, trails, boat launches, marinas, and other public shoreline access points. One of the strategic regional priorities of the RSAP is to provide equitable connected regional shoreline access that balances the need for human enjoyment, sustenance, and cultural connection to the bay with healthy ecosystems (BCDC 2024).

In response to Comment A13-4 and Comment A13-9, the following text has been added to the public services and recreation section on page 3.13-9 of the Draft EIR before the "Regional and Local Regulations" heading:

Original:

N/A

Revised:

San Francisco Bay Plan

The San Francisco Bay Plan (Bay Plan) is BCDC's comprehensive plan for the San Francisco Bay and its shoreline. The Bay Plan guides BCDC's planning activities and its review of projects through its Regulatory program. BCDC cannot approve a permit for a project that is not consistent with the Bay Plan. The Bay Plan includes findings and policies that provide for protection of Bay resources, review of development proposals in BCDC's jurisdiction, and the design of public access. Specifically, the Bay Plan requires that new development within San Francisco Bay and along the Bay shoreline provide maximum feasible public access to and along the waterfront. Public access must be sited, designed, and managed to prevent significant adverse effects on wildlife and their habitats, to be inclusive and accessible to all users, and be resilient to sea level rise and shoreline flooding. Public access must be permanently guaranteed through easements or dedications, and in-lieu public access may be provided where on-site access is not feasible because of public safety considerations, incompatible land uses, or sensitivity to human intrusion. The Bay Plan also encourages connectivity to regional trails, parks, public transit, and shoreline recreation areas. The Bay Plan further directs that public access be designed consistent with BCDC's Public Access Design Guidelines for the San Francisco Bay. These policies are implemented at the project level through BCDC's permitting and review authority (BCDC 2025).

3.10 DRAFT EIR SECTION 3.14, PUBLIC UTILITIES AND FACILITIES

In response to Comment A5-3, the following clarifications have been made to the public utilities and facilities section on page 3.14-9 of the Draft EIR:

Original:

In 2003, ACWD opened the Newark Desalination Facility, the first brackish water desalination facility in northern California, with a capacity of 5 mgd, and it doubled the production to 10 mgd for a total blended production of 12.5 mgd to the distribution system. Eight water agencies in the Bay Area (ACWD, BAWSCA, CCWD, EBMUD, MMWD, SFPUC, SCVWD, and Zone 7 Water Agency) are working together to investigate opportunities for collaboration. The purpose of this planning effort, known as Bay Area Regional Reliability (BARR), is to identify projects and processes to enhance water supply reliability across the region, leverage existing infrastructure investments, facilitate water transfers during critical shortages, and improve climate change resiliency. Projects

to be considered will include interagency interties and pipelines, treatment plan improvements and expansion, groundwater management and recharge, potable reuse, desalination, and water transfers. While no specific capacity or supply has been identified, this program may result in additional future supplies that would benefit Bay Area Customers (Brown and Caldwell 2017).

Revised:

Eight water agencies in the Bay Area, consisting of ACWD, BAWSCA, CCWD, EBMUD, MMWD, SFPUC, SCVWD, and Zone 7 Water Agency, are working together to investigate opportunities for collaboration. The purpose of this planning effort, known as Bay Area Regional Reliability (BARR), is to identify projects and processes to enhance water supply reliability across the region, leverage existing infrastructure investments, facilitate water transfers during critical shortages, and improve climate change resiliency. Projects to be considered will include interagency interties and pipelines, treatment plan improvements and expansion, groundwater management and recharge, potable reuse, desalination, and water transfers. While no specific capacity or supply has been identified, this program may result in additional future supplies that would benefit Bay Area Customers (Brown and Caldwell 2017). A regional desalination project was evaluated by five of the eight BARR agencies between 2003 and 2013. While the project is currently not being pursued, several BARR agencies have expressed interest in potentially moving forward with it in the future if external funding support becomes available. Additionally, ACWD, SFPUC, and Union Sanitary District developed a conceptual level project that envisions using ACWD's Newark Brackish Groundwater Desalination Plant and SFPUC's Bay Division Pipeline to provide emergency supplies and water transfer opportunities.

In response to Comment A7-6, the following revision has been made to the public utilities and facilities section on page 3.14-3 of the Draft EIR:

Original:

In the 2019-2020 fiscal year, it provided water for a total of 87,323 customers (ACWD 2021).

Revised:

In the 2019-2020 fiscal year, it had 87,323 retail connections and provided water for a total of 347,000 people and (ACWD 2025).

In response to Comment A18-8, the following clarifications have been made to the public utilities and facilities section on page 3.11-25 of the Draft EIR:

Original:

Portions of Alameda, Contra Costa, and Solano Counties overlap with areas covered by the Delta Plan. The Delta Plan encompasses the Primary and Secondary Zones of the Sacramento–San Joaquin Delta as well as the Suisun Marsh. The boundaries, which are described in Delta Plan Policy DP P1, Locate New Urban Development Wisely (23 CCR Section 5010), are intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk. Delta Plan Policy DP P1 is consistent with the Delta Reform Act (PRC Section 29702) which states that one of the basic goals of the State for the Delta is to "[p]rotect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities." Projected development could affect consistency with the Delta Plan adopted by the Delta Stewardship Council if projects could expand urban development into the Delta. In order to be consistent with Delta Plan Policy DP P1, new residential, commercial, or industrial development is permitted outside the urban boundaries only if it is consistent with the

land use designated in the relevant county general plan as of the date of the Delta Plan's adoption (January 2019). ...

Jurisdictions with land in the Primary Zone are required by PRC Section 29763 to adopt general plans with land uses consistent with the goals and the policies in the Delta Plan, subject to review by the Delta Stewardship Council. Therefore, subsequent projects within the proposed plan that fall within the Delta Plan boundaries would be required to demonstrate consistency with the plan and satisfy mitigation requirements.

Revised:

Portions of Alameda, Contra Costa, and Solano Counties overlap with areas covered by the Delta Plan. The Delta Plan encompasses the Primary and Secondary Zones of the Sacramento–San Joaquin Delta as well as the Suisun Marsh. The boundaries, which are described in Delta Plan Policy DP P1, Locate New Urban Development Wisely (23 CCR Section 5010), are intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk. Delta Plan Policy DP P1 is consistent with the Delta Reform Act (Water Code Section 85000 et seq .) and the Delta Protection Act, (PRC Section 29702) which states that one of the basic goals of the State for the Delta is to "[p]rotect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities." Projected development could affect consistency with the Delta Plan adopted by the Delta Stewardship Council if projects could expand urban development into the Delta. In order to be consistent with Delta Plan Policy DP P1, new residential, commercial, or industrial development is permitted outside the urban boundaries only if it is consistent with the land use designated in the relevant county general plan as of the date of the Delta Plan's adoption (May 16, 2013). ...

Jurisdictions with land in the Primary and Secondary Zones are required to adopt local and regional planning documents that are consistent with the policies in the Delta Plan, subject to review by the Delta Stewardship Council (Water Code Section 85212). Therefore, subsequent projects within the proposed plan that fall within the Delta Plan boundaries would be required to demonstrate consistency with the plan and satisfy mitigation requirements.

In response to Comment A18-8, the following clarifications have been made to the public utilities and facilities section on page 3.11-29 of the Draft EIR:

Original:

Portions of Alameda, Contra Costa, and Solano Counties overlap with areas covered by the Delta Plan, adopted by the Delta Stewardship Council. The boundaries, which are described in Delta Plan Policy DP Pl, Locate New Urban Development Wisely (23 CCR Section 5010), are intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk. Delta Plan Policy DP P1 is consistent with the Delta Reform Act (PRC Section 29702) which states that one of the basic goals of the State for the Delta is to "[p]rotect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities."

Revised:

Portions of Alameda, Contra Costa, and Solano Counties overlap with areas covered by the Delta Plan, adopted by the Delta Stewardship Council. The boundaries, which are described in Delta Plan Policy DP Pl, Locate New Urban Development Wisely (23 CCR Section 5010), are intended to strengthen existing Delta communities while protecting farmland and open space, providing land

for ecosystem restoration needs, and reducing flood risk. Delta Plan Policy DP P1 is consistent with the Delta Reform Act (Wat. Code, Sect. 85000 et seq.) (Water Code Section 85000 et seq .) and the Delta Protection Act, (PRC Section 29702), which states that one of the basic goals of the State for the Delta is to "[p]rotect, maintain, and, where possible, enhance and restore the overall quality of the Delta environment, including, but not limited to, agriculture, wildlife habitat, and recreational activities."

3.11 DRAFT EIR SECTION 3.15, "TRANSPORTATION"

A staff-initiated revision has been made to the second paragraph on page 3.15-2 of Section 3.15, "Transportation." The revision does not alter the conclusions of the EIR with respect to the significance of impacts or substantially change the severity of significant impacts.

Original:

Amtrak provides long-distance passenger rail services to the Bay Area via the Capitol Corridor, Gold Runner, Coast Starlight, and California Zephyr lines, connecting the region to the Central Valley, Southern California, the Pacific Northwest, and the Midwest.

Revised:

Amtrak provides long-distance passenger rail services to the Bay Area via the Capitol Corridor, San Joaquin, Coast Starlight, and California Zephyr lines, connecting the region to the Central Valley, Southern California, the Pacific Northwest, and the Midwest.

In response to Comment A8-3, the following revision has been made to the transportation section on pages 3.15-12 and 3.15-13 of the Draft EIR:

Original:

The Climate Action Plan for Transportation Infrastructure was adopted on July 12, 2021, and updated in January 2025 (CalSTA 2025). The Climate Action Plan for Transportation Infrastructure details how the State recommends investing billions of discretionary transportation dollars annually to aggressively combat and adapt to climate change while supporting public health, safety, and equity. The 2021 Climate Action Plan for Transportation Infrastructure was built on executive orders signed by Governor Gavin Newsom in 2019 and 2020 targeted at reducing GHG emissions in transportation, which account for more than 40% of all emissions, to reach the State's ambitious climate goals. The 2025 update includes new strategies and actions to further implement the existing investment framework (CalSTA 2025).

Revised:

The Climate Action Plan for Transportation Infrastructure was adopted on July 12, 2021, and updated in January 2025 (CalSTA 2025). The Climate Action Plan for Transportation Infrastructure details how the State recommends investing billions of discretionary transportation dollars annually to aggressively combat and adapt to climate change while supporting public health, safety, and equity. The 2021 Climate Action Plan for Transportation Infrastructure was built on executive orders signed by Governor Gavin Newsom in 2019 and 2020 targeted at reducing GHG emissions in transportation, which account for more than 40% of all emissions, to reach the State's ambitious climate goals. The Climate Action Plan for Transportation Infrastructure guiding principles include considering alternatives to highway capacity expansion when addressing congestion. The 2025 update includes new strategies and actions to further implement the existing investment framework (CalSTA 2025).

In response to Comment A13-10, the following addition has been included in the transportation section on page 3.15-15 of the Draft EIR:

Original:

N/A

Revised:

San Francisco Bay Conservation and Development Commission Bay Plan
The San Francisco Bay Conservation and Development Commission (BCDC) Bay Plan is a state-adopted policy document that guides the protection, enhancement, and responsible use of the San Francisco Bay and its shoreline, including policies related to transportation, public access, and shoreline development. The Bay Plan provides findings and policies to ensure that transportation facilities within the Bay and along the shoreline are planned and designed to minimize environmental impacts while supporting regional mobility and public access.

A staff-initiated revision has been made to the second paragraph on page 3.15-6 of Section 3.15, "Transportation." The revision does not alter the conclusions of the EIR with respect to the significance of impacts or substantially change the severity of significant impacts.

Original:

For example, the expansion of TNC use and the deployment of autonomous vehicles could introduce zero-passenger vehicle miles as a significant source of car travel on roadways. The aggregate, long-term effect these technologies will have on the transportation system is uncertain and will be shaped by regulations and policies surrounding their use.

Revised:

For example, the expansion of TNC use and the deployment of autonomous vehicles could increase zero-passenger vehicle miles, which could be a significant source of car travel on roadways. The aggregate, long-term effect these technologies will have on the transportation system is uncertain and will be shaped by regulations and policies surrounding their use.

3.12 DRAFT EIR CHAPTER 4, "ALTERNATIVES TO THE PROPOSED PLAN"

A staff-initiated revision has been made on page 4.9 of the Draft EIR.

Original:

- **Strategy: T7 Expand Freeways and Mitigate Impacts:** Eliminates $3.7 billion in funding across 10 freeway expansion projects, including auxiliary lanes, HOV lanes, express lanes, and associated funding for project development and VMT mitigation strategies.

Revised:

- **Modify Strategy T7, Expand Freeways and Mitigate Impacts:** Eliminates $3.7 billion in funding across 10 freeway expansion projects, including auxiliary lanes, HOV lanes, express lanes, and associated funding for project development and VMT mitigation strategies

In May 2025, Congress adopted joint resolutions under the Congressional Review Act, signed into law on June 12, 2025, that overturned U.S. EPA waivers allowing California to enforce several vehicle emissions regulations, including the Advanced Clean Trucks regulation, the Zero-Emission Airport Shuttle regulation, the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and the Heavy-Duty Omnibus regulation. As a result,

these regulations can no longer be enforced by the state or counted toward federal air-quality planning under the Clean Air Act. In response to these federal actions, the California Air Resources Board submitted a request to EPA on October 31, 2025, to adjust the EMFAC2021 emissions model to remove the estimated pollution-reduction benefits associated with these regulations. On November 21, 2025, EPA approved the use of EMFAC2021 with these adjustment factors for State Implementation Plan development and transportation conformity determinations.

In response to EPA's approval of the use of the EMFAC2021 model with adjustment factors for State Implementation Plan development and transportation conformity determinations, the emissions estimates presented in Tables 4-15 (EMFAC2021) and 4-16 (EMFAC2017) and accompanying text within the analyses were updated to incorporate the approved EMFAC2021 adjustment factors. Specifically, the following updates were made to the Draft EIR:

The following edits were made to the second and third paragraphs on Page 4-24:

Original:

In an effort to account for a range of potential scenarios in regard to whether the State is able to implement its own stricter emissions standards in the future, a range of mobile source emissions estimates were calculated for the proposed plan. Therefore, older emissions models that do not assume termination of gas engine vehicle sales by 2035, for instance, were used to determine project-related impacts. Emissions were calculated using both EMFAC2017 and EMFAC2021, in combination with equivalent model versions of CT-EMFAC (the California Department of Transportation ([Caltrans]) model based on data derived from CARB's EMFAC model and ancillary data sets. See Section 3.4, "Air Quality," for further details regarding the emissions estimation methodology and information regarding the current regulatory setting.

Tables 4-13 and 4-14 provide a summary of exhaust emissions, fine particulate matter (PM2.5), and VMT changes in Overburdened Communities and the remainder of the region compared to the existing conditions based on the land use growth footprints using EMFAC2017 and EMFAC2021. Tables 4-15 and 4-16 show the estimated criteria pollutant emissions for each alternative using EMFAC2017 and EMFAC2021. Calculations emissions performed using EMFAC2017 provide a more conservative estimate of emissions (emissions are higher) compared to EMFAC2021 for most instances because EMFAC2017 includes emissions reduction estimates based on older, less stringent mobile-source emissions regulations. However, in some instances, EMFAC2021 emissions estimates may be greater due to the model's higher estimation of emissions from passenger vehicles. The analysis below bases its discussion of impacts of the proposed plan compared to the alternatives based on the more conservative estimates of emissions. MTC anticipates that emissions modeled using an updated EMFAC2021 that accounts for rescission of California's waivers (once made available by CARB) will fall somewhere within the range of emissions modeled using EMFAC2017 and EMFAC2021. Other air quality impacts are discussed qualitatively below.

Revised:

In May 2025, Congress adopted joint resolutions under the Congressional Review Act, signed into law on June 12, 2025, that overturned U.S. Environmental Protection Agency waivers allowing California to enforce several vehicle emissions regulations, including the Advanced Clean Trucks regulation, the Zero-Emission Airport Shuttle regulation, the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and the Heavy-Duty Omnibus regulation. As a result, these regulations can no longer be enforced by the state or counted toward federal air-quality planning under the Clean Air Act. In response to these federal actions, the California Air Resources Board submitted a request to EPA on October 31, 2025, to adjust the EMFAC2021 emissions model to remove the estimated pollution-reduction benefits associated

with these regulations. On November 21, 2025, EPA approved the use of EMFAC2021 with these adjustment factors for State Implementation Plan development and transportation conformity determinations. Thus, the emissions estimates presented below were performed using this methodology approved by EPA on November 21, 2025.

The following edits were made to Table 4-15 and Table 4-16 on page 4-26 of the Draft EIR as follows:

Original:

Table 4-15: Emission Estimates in 2050 for Criteria Pollutants by Alternative (tons per day) (EMFAC2021)

Pollutant	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
ROG (summertime)	16.8	19.0	16.7	16.8
NO_X (summertime)	16.0	18.1	15.9	16.0
NO_X (wintertime)	19.1	21.5	19.0	19.1
$PM_{2.5}$ (wintertime)	4.7	5.1	4.6	4.6
PM_{10} (wintertime)	24.7	27.2	24.5	24.5
Vehicle Miles Traveled	181,222,800	204,547,500	180,111,900	180,651,200

Note: ROG = reactive organic gas; NO_X = nitrogen oxide; PM = particulate matter. Emissions estimates are based on average weekday travel activity forecasts and do not reflect expected impacts from Strategies EN8 or EN9 due to modeling limitations. PM emissions include exhaust, brake wear, tire wear, and re-entrained road dust. VMT estimates include intrazonal trips.
Sources: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

Table 4-16: Emission Estimates in 2050 for Criteria Pollutants by Alternative (tons per day) (EMFAC2017)

Pollutant	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
ROG (summertime)	15.7	17.7	15.6	15.7
NO_X (summertime)	34.5	38.8	34.3	34.4
NO_X (wintertime)	37.8	42.5	37.6	37.7
$PM_{2.5}$ (wintertime)	7.1	7.9	7.1	7.1
PM_{10} (wintertime)	28.9	32.1	28.7	28.8
Vehicle Miles Traveled	181,223,800	204,547,500	180,111,900	180,651,200

Note: ROG = reactive organic gas; NOx = nitrogen oxide; PM = particulate matter. Emissions estimates are based on average weekday travel activity forecasts and do not reflect expected impacts from Strategies EN8 or EN9 due to modeling limitations. PM emissions include exhaust, brake wear, tire wear, and re-entrained road dust. VMT estimates include intrazonal trips.
Sources: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

Revised:

Revised Tables 4-15: Emission Estimates in 2050 for Criteria Pollutants by Alternative Using EMFAC2021 with Adjustment Factors (tons per day)

Pollutant	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
ROG (summertime)	17.2	19.4	17.1	17.2
NO_X (summertime)	27.1	30.5	27.0	27.0
NO_X (wintertime)	30.2	33.9	30.0	30.1
$PM_{2.5}$ (wintertime)	4.8	5.3	4.8	4.8
PM_{10} (wintertime)	25.0	27.5	24.8	24.9
Vehicle Miles Traveled	181,221,800	204,547,500	180,111,900	180,651,200

Note: ROG = reactive organic gas; NO_X = nitrogen oxide; PM = particulate matter. Emissions estimates are based on average weekday travel activity forecasts and do not reflect expected impacts from Strategies EN8 or EN9 due to modeling limitations. PM emissions include exhaust, brake wear, tire wear, and re-entrained road dust. VMT estimates include intrazonal trips.

Sources: Emissions modeling using EMFAC2021 and EPA approved EMFAC2021 adjustment factors (November 21, 2025); data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

Table 4-16 removed.

The following edits were made to the last paragraph on page 4-26 and the first paragraph of on page 4-27 of the Draft EIR as follows:

Original:

The area-source emissions of criteria pollutants and precursors would increase over the planning horizon of the plan due to the net increase in land use development projects. As shown in **Table 4-16**, the regional VMT would be greater under the No Project Alternative than under the proposed plan (approximately 205 million versus approximately 181 million). Additionally, as shown in **Table 4-16**, the No Project Alternative would result in higher emissions for all criteria pollutants compared to the proposed plan. Because the No Project Alternative would emit a greater level of criteria air pollutants and VMT than the proposed plan, this impact would be significant and unavoidable for the reasons described under Impact AQ-3, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan.

Revised:

The area-source emissions of criteria pollutants and precursors would increase over the planning horizon of the plan due to the net increase in land use development projects. As shown in **Table 4-15**, the regional VMT would be greater under the No Project Alternative than under the proposed plan (approximately 205 million versus approximately 181 million). Additionally, as shown in **Table 4-15**, the No Project Alternative would result in higher emissions for all criteria pollutants compared to the proposed plan. Because the No Project Alternative would emit a greater level of criteria air pollutants and VMT than the proposed plan, this impact would be significant and unavoidable for the reasons described under Impact AQ-3, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan.

The following edits were made to the third paragraph under "Alternative 1: No New Highway Capacity and Transit Reinvestment Alternative" on page 4-27 of the Draft EIR as follows:

Original:

The area-source emissions of criteria pollutants and precursors would increase over the planning horizon of the plan due to the net increase in land use, sea level rise adaptation projects, and transportation projects. As shown in **Table 4-14**, the increase of regional VMT would be less under Alternative 1 than the proposed plan (21% regional increase versus 22% regional increase). Alternative 1 would emit a lower level of criteria air pollutants than the proposed plan (see **Table 4-16**). Although Alternative 1 would result in a lower VMT than the proposed plan, this impact would be significant and unavoidable for the reasons described under Impact AQ-3. However, impacts under Alternative 1 would be less than those that would occur under the proposed plan because emissions would be less.

Revised:

The area-source emissions of criteria pollutants and precursors would increase over the planning horizon of the plan due to the net increase in land use, sea level rise adaptation projects, and transportation projects. As shown in **Table 4-14**, the increase of regional VMT would be less under

Alternative 1 than the proposed plan (21% regional increase versus 22% regional increase). Alternative 1 would emit a slightly lower level of criteria air pollutants than the proposed plan except for $PM_{2.5}$ that both proposal plan and Alternative 1 would result in the same level of $PM_{2.5}$ emissions (see **Table 4-15**). Although Alternative 1 would result in a lower VMT than the proposed plan, this impact would be significant and unavoidable for the reasons described under Impact AQ-3. However, impacts under Alternative 1 would be less than those that would occur under the proposed plan because emissions would be less.

The following edits were made to the third paragraph under "Alternative 2: TOC Growth Focus Alternative" on page 4-28 of the Draft EIR as follows:

Original:

The area-source emissions of criteria pollutants and precursors would increase over the planning horizon of the plan due to the net increase in land use, sea level rise adaptation projects, and transportation projects. As shown in **Table 4-14**, the increase of regional VMT would be less under the TOC Growth Focus Alternative than the proposed plan (20% regional increase versus 21% regional increase). This is because the TOC Growth Focus Alternative would emit a lower level of criteria air pollutants than the proposed plan (see **Table 4-16**). Although Alternative 2 would result in a lower VMT than the proposed plan, this impact would be significant and unavoidable for the reasons described under Impact AQ-3. However, impacts under Alternative 2 would be would be less than those that would occur under the proposed plan because emissions would be less.

Revised:

The area-source emissions of criteria pollutants and precursors would increase over the planning horizon of the plan due to the net increase in land use, sea level rise adaptation projects, and transportation projects. As shown in **Table 4-14**, the increase of regional VMT would be less under the TOC Growth Focus Alternative than the proposed plan (20% regional increase versus 21% regional increase). The TOC Growth Focus Alternative would emit a slightly lower level of NOx and PM_{10} than the proposed plan and would emit the same level of ROG and $PM_{2.5}$ emissions as the proposed plan (see **Table 4-15**). Although Alternative 2 would result in a lower VMT than the proposed plan, this impact would be significant and unavoidable for the reasons described under Impact AQ-3. However, impacts under Alternative 2 would be less than those that would occur under the proposed plan because emissions would be less.

Tables 4-17 through 4-20 have been renumbered and the corresponding text on pages 4-29 and 4-30 of the Draft EIR have been revised as follows:

Original:

Table 4-17 provides a summary of the affected acreage of wetland features by alternative and **Table 4-18** provides the total acreage of impacted wetlands by alternative. **Table 4-19** provides a summary of affected essential connectivity by alternative. **Table 4-20** provides a summary of the affected key riparian corridors by alternative.

Table 4-17: Affected Acreage of Wetland Features by Alternative

Table 4-18: Total Affected Acreage of Wetland Features

Table 4-19: Affected Acreage of Bay Area Critical Linkages by Alternative

Table 4-20: Affected Key Riparian Corridors by Alternative (feet)

Revised:

Table 4-16 provides a summary of the affected acreage of wetland features by alternative and **Table 4-17** provides the total acreage of impacted wetlands by alternative. **Table 4-18** provides a summary of affected essential connectivity by alternative. **Table 4-19** provides a summary of the affected key riparian corridors by alternative.

Table 4-16: Affected Acreage of Wetland Features by Alternative

Table 4-17: Total Affected Acreage of Wetland Features

Table 4-18: Affected Acreage of Bay Area Critical Linkages by Alternative

Table 4-19: Affected Key Riparian Corridors by Alternative (feet)

Tables 4-17 through 4-20 have been renumbered and the corresponding text on page 4-31 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 4-17** and **Table 4-18**, primarily because of the reduced sea level rise adaptation projects footprint relative to the proposed plan, a smaller area of wetland features would be affected by the No Project Alternative (5,800 acres) than the proposed plan (44,900 acres). Although the proposed plan includes wetland restoration projects, the acreage of affected wetland in this analysis considers only those that occur under the existing conditions. This impact would be less than significant with mitigation for the reasons described under Impact BIO-2, and impacts under the No Project Alternative would be less than those that would occur under the proposed plan because less wetland features would overlap with the growth footprint compared to the proposed plan.

The Bay Area encompasses large areas of wildlands that provide habitat for both common and rare plants and wildlife, and some of these areas were mapped as Bay Area Critical Linkages. These areas are identified as lands likely important to wildlife movement between large, mostly natural areas at the statewide level in the Bay Area. As shown in **Table 4-19**, implementation of the No Project Alternative would result in a smaller area of affected Critical Linkages (30,500 acres) than the proposed plan (67,400 acres). As shown in **Table 4-20**, implementation of the No Project Alternative would also affect a lesser length of key riparian corridors (156,300 feet) than the proposed plan (348,000 feet).

Revised:

As shown in **Table 4-16** and **Table 4-17**, primarily because of the reduced sea level rise adaptation projects footprint relative to the proposed plan, a smaller area of wetland features would be affected by the No Project Alternative (5,800 acres) than the proposed plan (44,900 acres). Although the proposed plan includes wetland restoration projects, the acreage of affected wetland in this analysis considers only those that occur under the existing conditions. This impact would be less than significant with mitigation for the reasons described under Impact BIO-2, and impacts under the No Project Alternative would be less than those that would occur under the proposed plan because less wetland features would overlap with the growth footprint compared to the proposed plan.

The Bay Area encompasses large areas of wildlands that provide habitat for both common and rare plants and wildlife, and some of these areas were mapped as Bay Area Critical Linkages. These areas are identified as lands likely important to wildlife movement between large, mostly natural

areas at the statewide level in the Bay Area. As shown in **Table 4-18**, implementation of the No Project Alternative would result in a smaller area of affected Critical Linkages (30,500 acres) than the proposed plan (67,400 acres). As shown in **Table 4-19**, implementation of the No Project Alternative would also affect a lesser length of key riparian corridors (156,300 feet) than the proposed plan (348,000 feet).

Tables 4-17 through 4-20 have been renumbered and the corresponding text on pages 4-32 and 4-33 of the Draft EIR have been revised as follows:

Original:

As shown in **Table 4-17** and **Table 4-18**, the No New Highway Capacity and Transit Reinvestment Alternative would affect approximately the same acreage of wetland features (44,800 acres) as the proposed plan (44,900 acres). This impact would be less than significant with mitigation for the reasons described under Impact BIO-2, and impacts under Alternative 1 would be **similar** to those that would occur under the proposed plan because the same amount wetland features would overlap with the growth footprint.

The Bay Area encompasses large areas of wildlands that provide habitat for both common and rare plants and wildlife, and some of these areas were mapped as Bay Area Critical Linkages. As shown in **Table 4-19**, implementation of the No New Highway Capacity and Transit Reinvestment Alternative would result in a smaller area of affected Critical Linkages (66,500 acres) than the proposed plan (67,400 acres). As shown in **Table 4-20**, implementation of the No New Highway Capacity and Transit Reinvestment Alternative would also affect a lesser length of key riparian corridors (345,200 feet) than the proposed plan (348,000 feet).

Revised:

As shown in **Table 4-16** and **Table 4-17**, the No New Highway Capacity and Transit Reinvestment Alternative would affect approximately the same acreage of wetland features (44,800 acres) as the proposed plan (44,900 acres). This impact would be less than significant with mitigation for the reasons described under Impact BIO-2, and impacts under Alternative 1 would be **similar** to those that would occur under the proposed plan because the same amount wetland features would overlap with the growth footprint.

The Bay Area encompasses large areas of wildlands that provide habitat for both common and rare plants and wildlife, and some of these areas were mapped as Bay Area Critical Linkages. As shown in **Table 4-18**, implementation of the No New Highway Capacity and Transit Reinvestment Alternative would result in a smaller area of affected Critical Linkages (66,500 acres) than the proposed plan (67,400 acres). As shown in **Table 4-19**, implementation of the No New Highway Capacity and Transit Reinvestment Alternative would also affect a lesser length of key riparian corridors (345,200 feet) than the proposed plan (348,000 feet).

Tables 4-17 through 4-20 have been renumbered and the corresponding text on page 4-34 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 4-17** and **Table 4-18**, the TOC Growth Focus Alternative would affect approximately the same amount of wetland features (44,800 acres) as the proposed plan (44,900 acres). This impact would be less than significant for the reasons described under Impact BIO-2, and impacts under Alternative 2 would be **similar** those that would occur under the proposed plan because the same amount of wetland features would overlap with the growth footprint.

The Bay Area encompasses large areas of wildlands that provide habitat for both common and rare plants and wildlife, and some of these areas were mapped Bay Area Critical Linkages. As noted above, the Critical Linkages are not regulatory delineations but are identified as lands likely important to wildlife movement between large, mostly natural areas at the statewide level in the Bay Area. As shown in **Table 4-19**, implementation of the TOC Growth Focus Alternative would result in a smaller area of affected Critical Linkages (66,100 acres) than the proposed plan (67,400 acres). As shown in **Table 4-20**, implementation of the TOC Growth Focus Alternative would also affect a lesser length of key riparian corridors (339,000 feet) than the proposed plan (348,000 feet).

Revised:

As shown in **Table 4-16** and **Table 4-17**, the TOC Growth Focus Alternative would affect approximately the same amount of wetland features (44,800 acres) as the proposed plan (44,900 acres). This impact would be less than significant for the reasons described under Impact BIO-2, and impacts under Alternative 2 would be **similar** those that would occur under the proposed plan because the same amount of wetland features would overlap with the growth footprint.

The Bay Area encompasses large areas of wildlands that provide habitat for both common and rare plants and wildlife, and some of these areas were mapped Bay Area Critical Linkages. As noted above, the Critical Linkages are not regulatory delineations but are identified as lands likely important to wildlife movement between large, mostly natural areas at the statewide level in the Bay Area. As shown in **Table 4-18**, implementation of the TOC Growth Focus Alternative would result in a smaller area of affected Critical Linkages (66,100 acres) than the proposed plan (67,400 acres). As shown in **Table 4-19**, implementation of the TOC Growth Focus Alternative would also affect a lesser length of key riparian corridors (339,000 feet) than the proposed plan (348,000 feet).

The following edits were made to the text and Table 4-21 on page 4-35 of the Draft EIR as follows:

Original:

In an effort to account for a range of potential scenarios in regard to whether the State is able to implement stricter emissions standards in the future, a range of mobile source emissions estimates were calculated for the proposed plan using older emissions models that do not assume termination of gas engine vehicle sales by 2035. These model results were used to determine project-related impacts and were calculated using both CT-EMFAC2017 (the California Department of Transportation ([Caltrans]) model based on data derived from CARB's EMFAC model and ancillary data sets (based on EMFAC2017 emissions data) and EMFAC2021. MTC anticipates that emissions modeled using an updated EMFAC2021 that accounts for rescission of California's waivers (once made available by CARB) will fall somewhere within the range of emissions modeled using EMFAC2017 and EMFAC2021. See Section 3.6, "Climate Change, Greenhouse Gases, and Energy," for further details regarding the emissions estimation methodology and information regarding the current regulatory setting. See Appendix D for details regarding the various state and federal laws, regulations, and legislative actions accounted for in EMFAC2017 and EMFAC2021.

Tables 4-21 and 4-22 present a summary of mobile source emission by metric tons of carbon dioxide equivalent ($MTCO_2e$) per day for each alternative using EMFAC2017 and EMFAC2021.

In general, calculations made using EMFAC2017 provide a more conservative estimate of emissions, as compared to EMFAC2021, because EMFAC2017 includes emissions reduction estimates based on older, less stringent mobile-source emissions regulations. However, in some instances, EMFAC2021 emissions estimates may be greater due to the model's higher estimation of emissions from passenger vehicles. The analysis below bases its discussion of impacts of the

proposed plan compared to the alternatives based on the more conservative estimates of regional GHG emissions from EMFAC2021.

Table 4-23 shows the proposed plan and the alternatives' ability to meet the SB 375 goal of reducing GHG emissions per capita by 19% for passenger cars and light-duty trucks. This emissions reduction calculation relies on a version of EMFAC that deactivates clean car standards in order to isolate the benefits of the proposed plan's land use and transportation strategies. As a result, these emission reduction estimates are unaffected by Congressional actions to rescind California's waivers for mobile source emissions regulations.

The impacts related to climate change, greenhouse gases, and energy are discussed qualitatively below.

Table 4-21: Mobile Source Emissions in 2050 by Vehicle Source for Each Alternative (CO_2 tons per day) (EMFAC2021)

	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
Passenger Vehicles	42,900	48,100	42,700	42,800
Trucks	12,500	14,000	12,400	12,500
Buses	440	500	440	440
Other Vehicles	320	360	310	320
Regional total	56,200	62,900	55,800	56,000

Note: Numbers are rounded. Figures may not sum due to independent rounding. Source: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

Revised:

In January 2026, CARB recommended adjustments to the EMFAC2021 model to account for the uncertainty in the regulatory landscape as it is related to transportation-related regulations. The EMFAC2021 emission rates were combined with vehicle activity data provided by regional transportation agencies (such as MTC) to calculate the regional emissions inventories used to inform the GHG analysis. **Tables 4-20** present a summary of mobile source emission by metric tons of carbon dioxide equivalent ($MTCO_2e$) per day for each alternative using EMFAC2021.

Table 4-22 shows the proposed plan and the alternatives' ability to meet the SB 375 goal of reducing GHG emissions per capita by 19% for passenger cars and light-duty trucks. This emissions reduction calculation relies on a version of EMFAC that deactivates clean car standards in order to isolate the benefits of the proposed plan's land use and transportation strategies. As a result, these emission reduction estimates are unaffected by Congressional actions to rescind California's waivers for mobile source emissions regulations.

The impacts related to climate change, greenhouse gases, and energy are discussed qualitatively below.

Revised Table 4-21 to Table 4-20: Mobile Source Emissions in 2050 by Vehicle Source for Each Alternative (CO_2 tons per day) (EMFAC2021 with CARB Adjustment Factors)

	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
Passenger Vehicles	42,900	48,100	42,700	42,800
Trucks	17,700	19,900	17,600	17,700
Buses	530	600	530	530
Other Vehicles	320	360	310	320
Regional total	61,500	68,900	61,100	61,300

Note: Numbers are rounded. Figures may not sum due to independent rounding. Source: Data provided by MTC and ABAG in 2026; compiled by Ascent in 2026.

The following edits were made to tables and text on page 4-36 of the Draft EIR:

Original:

Table 4-22: Mobile Source Emissions in 2050 by Vehicle Source for Each Alternative (CO_2 tons per day) (EMFAC217)

	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
Passenger Vehicles	37,000	41,400	36,700	36,900
Trucks	13,900	15,600	13,800	13,900
Buses	950	1,100	940	950
Other Vehicles	390	440	390	390
Regional total	52,200	58,500	51,900	52,100

Note: Numbers are rounded. Figures may not sum due to independent rounding. Population statistics reflect the total Bay Area population able to travel on the region's transport network; it does not include immobile, involuntary populations such as prison inmates.

Source: Data provided by MTC and ABAG in 2025; complied by Ascent in 2025.

Table 4-23: SB 375 GHG Emissions Reductions Relative to 2005 Baseline for Each Alternative[1]

	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
Modeled Passenger Vehicles Emissions (2035)	67,000	74,300	66,600	67,600
Emissions Per Capita (2035)	13.7	17.4	13.7	13.7
Reductions in Emissions Per Capita Relative to 2005	-21%	0.4%	-21%	-21%

Note: SB = Senate Bill; GHG = greenhouse gas.

[1] Emissions estimates related to SB 376 reduction targets were estimated using EMFAC2014 in accordance with CARB guidance (CARB 2015).

Source: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

NO PROJECT ALTERNATIVE

The forecasted land use growth footprint, sea level rise adaptation projects, and transportation projects would contribute to construction-related and operational GHG emissions. In terms of operational GHG emissions, the No Project Alternative primarily differs from the proposed plan in the number and type of transportation projects and types of mobile source–based GHG emissions reduction programs. As shown in **Table 4-21**, mobile source emissions under the No Project Alternative would be higher (62,900 $MTCO_2e$/day) compared to the proposed plan (56,200 $MTCO_2e$/day). Similar to the proposed plan, construction emissions may not be reduced to net

zero in all cases. This impact would be significant and unavoidable for the reasons described in Impact GHG-1, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan because mobile source emissions would be greater under the No Project Alternative.

The No Project Alternative would not result in a reduction in GHG emissions per capita between 2005 and 2035 as shown in **Table 4-23**. Therefore, the No Project Alternative would not meet SB 375 goals to reduce per capita passenger vehicle and light-duty truck CO_2 emissions by over 19% by 2035 compared to 2005 baseline for the reasons described in Impact GHG-2. This impact would be significant and greater than the impact that would occur under the proposed plan because emissions would be greater. (*Impact GHG2 would be less than significant under the proposed plan.*)

The proposed plan meets SB 375 goals and places the Bay Area on a downward trajectory in GHG emissions, but CARB has identified that meeting SB 375 goals alone will not meet statewide goals under the 2022 Scoping Plan. Neither the proposed plan nor the No Project Alternative have additional land use strategies to feasibly bridge the gap between the proposed plan GHG emissions and 2030 (and beyond) targets. This gap would remain larger under the No Project Alternative than under the proposed plan (**Table 4-23**). Because GHG emissions from mobile sources would be greater under the No Project Alternative, this impact would be significant and unavoidable for the reasons described in Impact GHG-3, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan.

Revised:

Table 4-22 removed.

Table 4-23 revised to Table 4-21: SB 375 GHG Emissions Reductions Relative to 2005 Baseline for Each Alternative[1]

	Proposed Plan	No Project Alternative	Alternative 1	Alternative 2
Modeled Passenger Vehicles Emissions (2035)	67,000	74,300	66,600	67,600
Emissions Per Capita (2035)	13.7	17.4	13.7	13.7
Reductions in Emissions Per Capita Relative to 2005	-2.1%	0.4%	-21%	-21%

Note: SB = Senate Bill; GHG = greenhouse gas.

[1] Emissions estimates related to SB 376 reduction targets were estimated using EMFAC2014 in accordance with CARB guidance (CARB 2015).

Source: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

The forecasted land use growth footprint, sea level rise adaptation projects, and transportation projects would contribute to construction-related and operational GHG emissions. In terms of operational GHG emissions, the No Project Alternative primarily differs from the proposed plan in the number and type of transportation projects and types of mobile source–based GHG emissions reduction programs. As shown in **Table 4-20**, mobile source emissions under the No Project Alternative would be higher (68,900 $MTCO_2e$/day) compared to the proposed plan (61,500 $MTCO_2e$/day). Similar to the proposed plan, construction emissions may not be reduced to net zero in all cases. This impact would be significant and unavoidable for the reasons described in Impact GHG-1, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan because mobile source emissions would be greater under the No Project Alternative.

The No Project Alternative would not result in a reduction in GHG emissions per capita between 2005 and 2035 as shown in **Table 4-21**. Therefore, the No Project Alternative would not meet SB 375 goals to reduce per capita passenger vehicle and light-duty truck CO_2 emissions by over 19% by 2035 compared to 2005 baseline for the reasons described in Impact GHG-2. This impact would be significant and greater than the impact that would occur under the proposed plan because emissions would be greater. (*Impact GHG2 would be less than significant under the proposed plan.*)

The proposed plan meets SB 375 goals and places the Bay Area on a downward trajectory in GHG emissions, but CARB has identified that meeting SB 375 goals alone will not meet statewide goals under the 2022 Scoping Plan. Neither the proposed plan nor the No Project Alternative have additional land use strategies to feasibly bridge the gap between the proposed plan GHG emissions and 2030 (and beyond) targets. This gap would remain larger under the No Project Alternative than under the proposed plan (**Table 4-21**). Because GHG emissions from mobile sources would be greater under the No Project Alternative, this impact would be significant and unavoidable for the reasons described in Impact GHG-3, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan.

Table 4-31 has been renumbered and the corresponding text on page 4-37 of the Draft EIR has been revised as follows:

Original:

VMT per capita would be greater under the No Project Alternative (21.0) than under the proposed plan (18.6) (**Table 4-31**).

Revised:

VMT per capita would be greater under the No Project Alternative (21.0) than under the proposed plan (18.6) (**Table 4-29**).

The following edits were made to the text under the "Alternative 1: No New Highway Capacity and Transit Reinvestment Alternative" on page 4-37 of the Draft EIR:

Original:

Construction- and operations-related GHG emissions associated with the forecasted land use growth footprint, sea level rise adaptation projects, and transportation projects would contribute to GHG emissions. In terms of operations-related GHG emissions, Alternative 1 primarily differs from the proposed plan due to the number and type of transportation projects and types of mobile source–based GHG emission reduction programs. As shown in **Table 4-21**, mobile source emissions under Alternative 1 would be reduced (55,800 $MTCO_2e$/day) compared to the proposed plan (56,200 $MTCO_2e$/day). Similar to the proposed plan, construction emissions may not be reduced to net zero in all cases. This impact would be significant and unavoidable for the reasons described in Impact GHG-1, and impacts under Alternative 1 would be **less** than those that would occur under the proposed plan because mobile source emissions would be lower under Alternative 1.

Alternative 1 would result in a 21% reduction in GHG emissions, similar to the proposed plan, between 2005 and 2035, thereby meeting SB 375 goals to reduce per capita passenger vehicle and light-duty truck CO2 emissions by over 19% by 2035 compared to 2005 baseline (**Table 4-23**).

…

As shown in **Table 4-23**, Alternative 1 would reduce GHG emissions per capita by 21% relative to the 2005 baseline, which is the same level of reduction as the proposed plan.

Revised:

Construction- and operations-related GHG emissions associated with the forecasted land use growth footprint, sea level rise adaptation projects, and transportation projects would contribute to GHG emissions. In terms of operations-related GHG emissions, Alternative 1 primarily differs from the proposed plan due to the number and type of transportation projects and types of mobile source–based GHG emission reduction programs. As shown in **Table 4-20**, mobile source emissions under Alternative 1 would be reduced slightly (61,100 $MTCO_2e$/day) compared to the proposed plan (61,500 $MTCO_2e$/day). Similar to the proposed plan, construction emissions may not be reduced to net zero in all cases. This impact would be significant and unavoidable for the reasons described in Impact GHG-1, and impacts under Alternative 1 would be **less** than those that would occur under the proposed plan because mobile source emissions would be lower under Alternative 1.

Alternative 1 would result in a 21% reduction in GHG emissions, similar to the proposed plan, between 2005 and 2035, thereby meeting SB 375 goals to reduce per capita passenger vehicle and light-duty truck CO2 emissions by over 19% by 2035 compared to 2005 baseline (**Table 4-21**).

…

As shown in **Table 4-21**, Alternative 1 would reduce GHG emissions per capita by 21% relative to the 2005 baseline, which is the same level of reduction as the proposed plan.

Table 4-31 has been renumbered and the corresponding text on page 4-38 of the Draft EIR has been revised as follows:

Original:

VMT per capita would be the similar under Alternative 1 (18.5) as the proposed plan (18.6) (**Table 4-31**).

Revised:

VMT per capita would be the similar under Alternative 1 (18.5) as the proposed plan (18.6) (**Table 4-29**).

The following edits were made to the text under the "Alternative 2: TOC Growth Focus Alternative" on page 4-38 of the Draft EIR:

Original:

Construction-related GHG emissions associated with the forecasted land use growth footprint, sea level rise adaptation projects, and transportation projects would contribute to GHG emissions. In terms of operational GHG emissions, Alternative 2 primarily differs from the proposed plan due to the number and type of transportation projects and types of mobile source–based GHG emission reduction programs. As shown in **Table 4-21**, mobile source emissions under the TOC Growth Focus Alternative (56,000 $MTCO_2e$/day) would be similar to the proposed plan (56,200 $MTCO_2e$/day). Similar to the proposed plan, construction emissions may not be reduced to net zero in all cases. This impact would be significant and unavoidable for the reasons described in Impact GHG-1, and impacts under Alternative 2 would be **similar** to those that would occur under the proposed plan because emissions would be similar.

The TOC Growth Focus Alternative would result in a 21% reduction in GHG emissions, similar to the proposed plan, thereby meeting SB 375 goals to reduce per capita passenger vehicle and light-duty truck CO2 emissions by over 19% by 2035 compared to 2005 baseline (**Table 4-23**).

...

As shown in **Table 4-23**, the Policy Area Growth Focus Alternative would reduce GHG emissions per capita by 21% relative to the 2005 baseline, which represents the same reduction as the proposed plan.

Revised:

Construction-related GHG emissions associated with the forecasted land use growth footprint, sea level rise adaptation projects, and transportation projects would contribute to GHG emissions. In terms of operational GHG emissions, Alternative 2 primarily differs from the proposed plan due to the number and type of transportation projects and types of mobile source–based GHG emission reduction programs. As shown in **Table 4-20**, mobile source emissions under the TOC Growth Focus Alternative (61,300 $MTCO_2e$/day) would be similar to the proposed plan (61,500 $MTCO_2e$/day). Similar to the proposed plan, construction emissions may not be reduced to net zero in all cases. This impact would be significant and unavoidable for the reasons described in Impact GHG-1, and impacts under Alternative 2 would be **similar** to those that would occur under the proposed plan because emissions would be similar.

The TOC Growth Focus Alternative would result in a 21% reduction in GHG emissions, similar to the proposed plan, thereby meeting SB 375 goals to reduce per capita passenger vehicle and light-duty truck CO2 emissions by over 19% by 2035 compared to 2005 baseline (**Table 4-21**).

...

As shown in **Table 4-21**, the Policy Area Growth Focus Alternative would reduce GHG emissions per capita by 21% relative to the 2005 baseline, which represents the same reduction as the proposed plan.

Table 4-31 has been renumbered and the corresponding text on page 4-39 of the Draft EIR has been revised as follows:

Original:

VMT per capita would be similar under the Policy Area Growth Focus Alternative (18.5) and the proposed plan (18.6) (**Table 4-31**).

Revised:

VMT per capita would be similar under the Policy Area Growth Focus Alternative (18.5) and the proposed plan (18.6) (**Table 4-29**).

Tables 4-24 through 4-27 have been renumbered and the corresponding text on pages 4-42 and 4-43 of the Draft EIR have been revised as follows:

Original:

Tables 4-24 through 4-27 provide quantifiable data related to geology, seismicity, and mineral resource impacts.

Table 4-24: Alquist-Priolo Zone Acreage by Alternative

Table 4-25: Ground Shaking Potential Acreage by Alternative

Table 4-26: Liquefaction Potential Acreage by Alternative

Table 4-27: Landslide Zones Potential Acreage by Alternative

...

The land use growth footprint under the No Project Alternative overlaps with a larger portion of Alquist-Priolo Zones (1,100 acres) compared to the proposed plan (570 acres) (see **Table 4-24**). The sea level rise adaptation projects and transportation projects footprint under the No Project Alternative overlap with smaller portions of Alquist-Priolo Zones (50 and 20 acres, respectively) compared to the proposed plan (820 and 170 acres) (see **Table 4-24**).

Revised:

Tables 4-22 through 4-25 provide quantifiable data related to geology, seismicity, and mineral resource impacts.

Table 4-22: Alquist-Priolo Zone Acreage by Alternative

Table 4-23: Ground Shaking Potential Acreage by Alternative

Table 4-24: Liquefaction Potential Acreage by Alternative

Table 4-25: Landslide Zones Potential Acreage by Alternative

...

The land use growth footprint under the No Project Alternative overlaps with a larger portion of Alquist-Priolo Zones (1,100 acres) compared to the proposed plan (570 acres) (see **Table 4-22**). The sea level rise adaptation projects and transportation projects footprint under the No Project Alternative overlap with smaller portions of Alquist-Priolo Zones (50 and 20 acres, respectively) compared to the proposed plan (820 and 170 acres) (see **Table 4-22**).

Tables 4-25 through 4-27 have been renumbered and the corresponding text on page 4-44 of the Draft EIR has been revised as follows:

Original:

Table 4-25 quantifies the area within the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint based on this data.

...

Table 4-26 provides an acreage summary of the area of land use growth, sea level rise adaptation projects, and transportation projects footprints that would be subject to potential liquefaction.

...

Table 4-27 shows acreage of land use growth, sea level rise adaptation projects, and transportation projects footprints where there is potential for landslides.

Revised:

Table 4-23 quantifies the area within the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint based on this data.

...

Table 4-24 provides an acreage summary of the area of land use growth, sea level rise adaptation projects, and transportation projects footprints that would be subject to potential liquefaction.

...

Table 4-25 shows acreage of land use growth, sea level rise adaptation projects, and transportation projects footprints where there is potential for landslides.

Table 4-24 has been renumbered and the corresponding text on page 4-45 of the Draft EIR has been revised as follows:

Original:

The land use growth footprint, sea level rise projects footprint, and transportation projects footprint under Alternative 1 would overlap with the same land area within Alquist-Priolo Zones (1,600 acres) compared to the proposed plan (see **Table 4-24**).

Revised:

The land use growth footprint, sea level rise projects footprint, and transportation projects footprint under Alternative 1 would overlap with the same land area within Alquist-Priolo Zones (1,600 acres) compared to the proposed plan (see **Table 4-22**).

Tables 4-25 through 4-27 have been renumbered and the corresponding text on page 4-46 of the Draft EIR has been revised as follows:

Original:

Table 4-25 quantifies the area in the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint based on this data.

...

Alternative 1 would have less acreage of land in the transportation projects footprint located in areas subject to strong, very strong, or violent ground shaking compared to the proposed plan (**Table 4-25**).

...

Table 4-26 provides an acreage summary of land use growth, sea level rise adaptation projects, and transportation projects footprints that would be subject to potential liquefaction.

...

Table 4-27 shows acreage of land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint where there is potential for landslides.

Revised:

Table 4-23 quantifies the area in the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint based on this data.

...

Alternative 1 would have less acreage of land in the transportation projects footprint located in areas subject to strong, very strong, or violent ground shaking compared to the proposed plan (**Table 4-23**).

…

Table 4-24 provides an acreage summary of land use growth, sea level rise adaptation projects, and transportation projects footprints that would be subject to potential liquefaction.

…

Table 4-25 shows acreage of land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint where there is potential for landslides.

Tables 4-24 through 4-27 have been renumbered and the corresponding text on page 4-48 of the Draft EIR has been revised as follows:

Original:

Focus Alternative overlaps with a smaller portion of Alquist-Priolo Zones (450 acres) than the proposed plan (570 acres) (see **Table 4-24**).

…

Table 4-25 quantifies the area in the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint based on this data.

…

Table 4-26 provides a summary of the acreage of the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint that would be subject to potential liquefaction.

…

Table 4-27 shows acreage of land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint where there is potential for landslides.

Revised:

Focus Alternative overlaps with a smaller portion of Alquist-Priolo Zones (450 acres) than the proposed plan (570 acres) (see **Table 4-22**).

…

Table 4-23 quantifies the area in the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint based on this data.

…

Table 4-24 provides a summary of the acreage of the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint that would be subject to potential liquefaction.

…

Table 4-25 shows acreage of land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint where there is potential for landslides.

Tables 4-28 and 4-29 have been renumbered and the corresponding text on page 4-50 of the Draft EIR has been revised as follows:

Original:

Table 4-28 shows a summary of acreage of ultramafic rock (which produces asbestos) in the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint. **Table 4-29** shows a summary of the acreage of proposed plan and alternatives in fire hazard severity zones.

Table 4-28: Ultramafic Rock Acreage by Alternative

Table 4-29: Fire Hazard Zones Acreage by Alternative

Revised:

Table 4-26 shows a summary of acreage of ultramafic rock (which produces asbestos) in the land use growth footprint, sea level rise adaptation projects footprint, and transportation projects footprint. **Table 4-27** shows a summary of the acreage of proposed plan and alternatives in fire hazard severity zones.

Table 4-26: Ultramafic Rock Acreage by Alternative

Table 4-27: Fire Hazard Zones Acreage by Alternative

Table 4-28 has been renumbered and the corresponding text on page 4-51 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 4-28**, there would be a larger area of the land located in areas that may result in dispersal of NOA (i.e., ultramafic rock) under the No Project Alternative (940 acres) compared to the proposed plan (720 acres).

Revised:

As shown in **Table 4-26**, there would be a larger area of the land located in areas that may result in dispersal of NOA (i.e., ultramafic rock) under the No Project Alternative (940 acres) compared to the proposed plan (720 acres).

Table 4-29 has been renumbered and the corresponding text on pages 4-52 and 4-53 of the Draft EIR have been revised as follows:

Original:

The No Project Alternative would result in a smaller portion of the sea level rise adaptation projects footprint and transportation projects footprint located in fire hazard severity zones compared to the proposed plan (**Table 4-29**). Although the overall sea level rise adaptation projects footprint would be smaller under the No Project Alternative, sea level rise adaptation projects include wetland restoration and new green spaces with water that could serve as fire breaks. However, the No Project Alternative would result in a substantially greater land use growth footprint in a fire hazard severity zone rated moderate, high, or very high (10,200 acres) than the proposed plan (550 acres) (**Table 4-29**).

...

As shown in **Table 4-29**, there would be a smaller area of the land located in areas that may result in dispersal of NOA (i.e., ultramafic rock) under Alternative 1 (700 acres) compared to the proposed plan (720 acres).

...

Alternative 1 would result in the same amount of land in the land use growth footprint (550 acres) and the sea level rise adaptation projects footprint (4,000 acres) in a fire hazard severity zone rated moderate, high, or very high as with the proposed plan (**Table 4-29**).

Revised:

The No Project Alternative would result in a smaller portion of the sea level rise adaptation projects footprint and transportation projects footprint located in fire hazard severity zones compared to the proposed plan (**Table 4-27**). Although the overall sea level rise adaptation projects footprint would be smaller under the No Project Alternative, sea level rise adaptation projects include wetland restoration and new green spaces with water that could serve as fire breaks. However, the No Project Alternative would result in a substantially greater land use growth footprint in a fire hazard severity zone rated moderate, high, or very high (10,200 acres) than the proposed plan (550 acres) (**Table 4-27**).

...

As shown in **Table 4-27**, there would be a smaller area of the land located in areas that may result in dispersal of NOA (i.e., ultramafic rock) under Alternative 1 (700 acres) compared to the proposed plan (720 acres).

...

Alternative 1 would result in the same amount of land in the land use growth footprint (550 acres) and the sea level rise adaptation projects footprint (4,000 acres) in a fire hazard severity zone rated moderate, high, or very high as with the proposed plan (**Table 4-27**).

Table 4-28 has been renumbered and the corresponding text on page 4-54 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 4-28**, there would be a slightly smaller area of the land located in areas that may result in dispersal of NOA (i.e., ultramafic rock) under the TOC Growth Focus Alternative (650 acres) compared to the proposed plan (720 acres).

Revised:

As shown in **Table 4-26**, there would be a slightly smaller area of the land located in areas that may result in dispersal of NOA (i.e., ultramafic rock) under the TOC Growth Focus Alternative (650 acres) compared to the proposed plan (720 acres).

Tables 4-29 and 4-30 have been renumbered and the corresponding text on page 4-55 of the Draft EIR has been revised as follows:

Original:

Alternative 2 would result in the same amount of land in the sea level rise adaptation projects footprint (4,000 acres) and the transportation projects footprint (630 acres) in a fire hazard severity zone rated moderate, high, or very high as the proposed plan (**Table 4-29**). However, the alternative would result in a smaller land use growth footprint within a fire hazard severity zone rated moderate, high, or very high (450 acres) than the proposed plan (550 acres) (**Table 4-29**).

…

Table 4-30 provides a summary of the flood zone acreage associated with the proposed plan and alternatives.

Table 4-30: Flood Zone Acreage by Alternative

Revised:

Alternative 2 would result in the same amount of land in the sea level rise adaptation projects footprint (4,000 acres) and the transportation projects footprint (630 acres) in a fire hazard severity zone rated moderate, high, or very high as the proposed plan (**Table 4-27**). However, the alternative would result in a smaller land use growth footprint within a fire hazard severity zone rated moderate, high, or very high (450 acres) than the proposed plan (550 acres) (**Table 4-27**).

…

Table 4-28 provides a summary of the flood zone acreage associated with the proposed plan and alternatives.

Table 4-28: Flood Zone Acreage by Alternative

Table 4-30 has been renumbered and the corresponding text on page 4-57 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 4-30**, there would be a greater area of the land use growth footprint in the 100-year flood hazard zone under the No Project Alternative (5,000 acres) compared to the proposed plan (4,400 acres).

Revised:

As shown in **Table 4-28**, there would be a greater area of the land use growth footprint in the 100-year flood hazard zone under the No Project Alternative (5,000 acres) compared to the proposed plan (4,400 acres).

Table 4-30 has been renumbered and the corresponding text on page 4-58 of the Draft EIR has been revised as follows:

Original:

As discussed above, there would be the similar acreage of the land use growth footprint in the 100-year flood hazard zone as under Alternative 1 (**Table 4-30**, 4,400 acres) and smaller area in the 100-year flood hazard zone associated with transportation projects (840 acres).

Revised:

As discussed above, there would be the similar acreage of the land use growth footprint in the 100-year flood hazard zone as under Alternative 1 (**Table 4-28**, 4,400 acres) and smaller area in the 100-year flood hazard zone associated with transportation projects (840 acres).

Table 4-30 has been renumbered and the corresponding text on page 4-60 of the Draft EIR has been revised as follows:

Original:

As discussed above, there would be a smaller area of the land use growth footprint in the 100- year flood hazard zone under the TOC Growth Focus Alternative compared the proposed plan (**Table 4-30**, 3,900 acres versus 4,400 acres) and the same area in the 100-year flood hazard zone associated with transportation projects (1,200 acres).

Revised:

As discussed above, there would be a smaller area of the land use growth footprint in the 100- year flood hazard zone under the TOC Growth Focus Alternative compared the proposed plan (**Table 4-28**, 3,900 acres versus 4,400 acres) and the same area in the 100-year flood hazard zone associated with transportation projects (1,200 acres).

Tables 4-31 through 4-33 have been renumbered and the corresponding text on pages 4-70 and 4-71 of the Draft EIR have been revised as follows:

Original:

Table 4-31 provides a summary of Bay Area travel behavior in 2050 under the proposed plan and alternatives. **Table 4-32** provides a comparison of average trip length by alternative. Table 4-33 provides a comparison of journey to work method by alternative.

Table 4-31: Comparison of Bay Area Travel Behavior by Alternative in 2050

Table 4-32: Comparison of Daily Average Trip Length by Purpose by Alternative in 2050 (miles)

Table 4-33: Comparison of Journey to Work by Mode by Alternative in 2050

Revised:

Table 4-29 provides a summary of Bay Area travel behavior in 2050 under the proposed plan and alternatives. **Table 4-30** provides a comparison of average trip length by alternative. Table 4-33 provides a comparison of journey to work method by alternative.

Table 4-29: Comparison of Bay Area Travel Behavior by Alternative in 2050

Table 4-30: Comparison of Daily Average Trip Length by Purpose by Alternative in 2050 (miles)

Table 4-31: Comparison of Journey to Work by Mode by Alternative in 2050

Tables 4-31 through 4-33 have been renumbered and the corresponding text on page 4-72 of the Draft EIR has been revised as follows:

Original:

As shown in **Table 4-31**, modeling indicates that the No Project Alternative would result in more daily trips (approximately 31.9 million versus 31.5 million) and less transit passenger use than the proposed plan (approximately 12.9 million daily passenger miles versus 21.9 million daily passenger miles). In addition, the No Project Alternative would result in longer trips than the proposed plan (5.9 miles versus 5.7 miles, **Table 4-32**) and a larger share of drive-alone, automobile-based commuting (39% versus 31%, **Table 4-33**). Overall, because VMT per capita would be greater under the No Project Alternative than the proposed plan (21.0 versus 18.6, **Table 4-31**), this impact would be significant and unavoidable for the reasons described under Impact TRA-2, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan.

...

Alternative 1 would feature growth similar to the proposed plan (**Table 4-3 and Table 4-6**). However, additional funding would be invested in transit in lieu of highway projects that add lane-mileage to the system. As shown in **Table 4-31**, modeling indicates that Alternative 1 would result in slightly fewer daily trips (approximately 31.46 million versus 31.50 million) and slightly more transit passenger use than the proposed plan (approximately 23.3 million daily passenger miles versus 21.9 million daily passenger miles). In addition, Alternative 1 would result in slightly longer average trips than the proposed plan (5.8 miles versus 5.7 miles, **Table 4-32**) and the same share of drive-alone automobile-based commuting (31%, **Table 4-33**). VMT per capita would be less under Alternative 1 compared to the proposed plan (18.5 versus 18.6, **Table 4-31**).

Revised:

As shown in **Table 4-29**, modeling indicates that the No Project Alternative would result in more daily trips (approximately 31.9 million versus 31.5 million) and less transit passenger use than the proposed plan (approximately 12.9 million daily passenger miles versus 21.9 million daily passenger miles). In addition, the No Project Alternative would result in longer trips than the proposed plan (5.9 miles versus 5.7 miles, **Table 4-30**) and a larger share of drive-alone, automobile-based commuting (39% versus 31%, **Table 4-31**). Overall, because VMT per capita would be greater under the No Project Alternative than the proposed plan (21.0 versus 18.6, **Table 4-29**), this impact would be significant and unavoidable for the reasons described under Impact TRA-2, and impacts under the No Project Alternative would be **greater** than those that would occur under the proposed plan.

...

Alternative 1 would feature growth similar to the proposed plan (**Table 4-3 and Table 4-6**). However, additional funding would be invested in transit in lieu of highway projects that add lane-mileage to the system. As shown in **Table 4-29**, modeling indicates that Alternative 1 would result in slightly fewer daily trips (approximately 31.46 million versus 31.50 million) and slightly more transit passenger use than the proposed plan (approximately 23.3 million daily passenger miles versus 21.9 million daily passenger miles). In addition, Alternative 1 would result in slightly longer average trips than the proposed plan (5.8 miles versus 5.7 miles, **Table 4-30**) and the same share of drive-alone automobile-based commuting (31%, **Table 4-31**). VMT per capita would be less under Alternative 1 compared to the proposed plan (18.5 versus 18.6, **Table 4-29**).

Tables 4-31 through 4-34 have been renumbered and the corresponding text on page 4-73 of the Draft EIR has been revised as follows:

Original:

> The TOC Growth Focus Alternative would result in similar levels of household growth in the proposed plan's Growth Geographies and slightly higher levels of job growth in Growth Geographies compared to the proposed plan (**Table 4-3** and **Table 4-6**). This means that housing growth would be similar, while job growth would be slightly more concentrated in the region's two largest job centers of San Francisco and the northern portion of the Bay Area. As shown in **Table 4-31**, modeling indicates that the TOC Growth Focus Alternative would result in slightly fewer daily trips than the proposed plan (approximately 31.4 million versus 31.5 million) and more transit passenger use than the proposed plan (approximately 22.5 million passenger miles versus 21.9 million passenger miles). In addition, under the TOC Growth Focus Alternative, there would be slightly longer average trips (5.8 miles versus 5.7 miles, **Table 4-32**) and a similar share of automobile-based commuting (31%, **Table 4-33**). Per capita VMT would be less under the TOC Growth Focus Alternative than the proposed plan (18.5 versus 18.6, **Table 4-32**).
>
> …
>
> **Table 4-34** (included at the end of this chapter) provides a comparison of the environmental effects of the alternatives in relation to the proposed plan to assist in understanding the relative differences in outcomes expected to result from implementation of the alternatives.

Revised:

> The TOC Growth Focus Alternative would result in similar levels of household growth in the proposed plan's Growth Geographies and slightly higher levels of job growth in Growth Geographies compared to the proposed plan (**Table 4-3** and **Table 4-6**). This means that housing growth would be similar, while job growth would be slightly more concentrated in the region's two largest job centers of San Francisco and the northern portion of the Bay Area. As shown in **Table 4-29**, modeling indicates that the TOC Growth Focus Alternative would result in slightly fewer daily trips than the proposed plan (approximately 31.4 million versus 31.5 million) and more transit passenger use than the proposed plan (approximately 22.5 million passenger miles versus 21.9 million passenger miles). In addition, under the TOC Growth Focus Alternative, there would be slightly longer average trips (5.8 miles versus 5.7 miles, **Table 4-30**) and a similar share of automobile-based commuting (31%, **Table 4-31**). Per capita VMT would be less under the TOC Growth Focus Alternative than the proposed plan (18.5 versus 18.6, **Table 4-30**).
>
> …
>
> **Table 4-32** (included at the end of this chapter) provides a comparison of the environmental effects of the alternatives in relation to the proposed plan to assist in understanding the relative differences in outcomes expected to result from implementation of the alternatives.

Tables 4-23 and 4-31 have been renumbered and the corresponding text on page 4-74 of the Draft EIR has been revised as follows:

Original:

> As shown in **Table 4-23**, the proposed plan, No New Highway Capacity and Transit Reinvestment Alternative (Alternative 1), and TOC Policy Area Alternative (Alternative 2) would have the same reduction (21%) in per capita GHG emissions in 2035, whereas the No Project Alternative would result in 0% reduction in per capita GHG emissions in 2035. Furthermore, the No New Highway

Capacity and Transit Reinvestment Alternative would have the lowest daily VMT in 2050, followed by the TOC Growth Focus Alternative, proposed plan, and No Project Alternative, as reflected in **Table 4-31**.

Revised:

As shown in **Table 4-21**, the proposed plan, No New Highway Capacity and Transit Reinvestment Alternative (Alternative 1), and TOC Policy Area Alternative (Alternative 2) would have the same reduction (21%) in per capita GHG emissions in 2035, whereas the No Project Alternative would result in 0% reduction in per capita GHG emissions in 2035. Furthermore, the No New Highway Capacity and Transit Reinvestment Alternative would have the lowest daily VMT in 2050, followed by the TOC Growth Focus Alternative, proposed plan, and No Project Alternative, as reflected in **Table 4-29**.

Table 4-34 has been renumbered and the corresponding text on page 4-77 of the Draft EIR has been revised as follows:

Original:

Table 4-34: Summary Comparison of Impacts

Revised:

Table 4-31: Summary Comparison of Impacts

3.13 DRAFT EIR CHAPTER 7, "REFERENCES"

In response to Comment A7-6, the following reference has been added to the public utilities and facilities section on page 7-25 of the Draft EIR:

Original:

N/A

Revised:

Alameda County Water District. 2025. *Alameda County Water District's Comments on Draft Plan Bay Area 2050+ Environmental Impact Report*.

In response to Comment A7-7, the following reference has been revised to the public utilities and facilities section on page 7-25 of the Draft EIR:

Original:

Alameda County Water District. 2021. *Urban Water Management Plan 2020-2025*. Available: https://www.acwd.org/DocumentCenter/View/3816/Final-2020-2025-UWMP. Accessed November 25, 2024.

Revised:

Alameda County Water District. 2021. *Urban Water Management Plan 2020-2025*. Available: https://www.acwd.org/DocumentCenter/View/4116/Final-2020-2025-UWMP-Version-Including-Minor-Edits. Accessed December 29, 2025.

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No sources are cited in this chapter.

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BCDC. *See* San Francisco Bay Conservation and Development Commission.

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CARB. *See* Calfiornia Air Resources Board.

MTC and ABAG. *See* Metropolitan Transportation Commission and Association of Bay Area Governments.

MTC/ABAG and BCDC. *See* Metropolitan Transportation Commission/Association of Bay Area Governments and San Francisco Bay Conservation and Development Commission.

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San Francisco Bay Conservation and Development Commission. 2025 (March). *San Francisco Bay Plan*. Adopted in 1968; reflects amendments through March 2025. Available: https://www.bcdc.ca.gov/wp-content/uploads/sites/354/2025/05/SanFranciscoBayPlan_ADA.pdf. Accessed: December 30, 2025.

San Francisco Estuary Institute. 2015. *The Baylands and Climate Change, Baylands Ecosystem Habitat Goals Science Update*. Available: https://www.sfei.org/projects/baylands-ecosystem-habitat-goals-project. Accessed January 2026.

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California Energy Commission. 2024. *Integrated Energy Policy Report*. Available: https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report-iepr/2024-integrated-energy-policy-report. Accessed: January 15, 2025

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Chapter 3, "Revisions to the Draft EIR"

No sources are cited in this chapter.

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Draft CEQA Findings and Facts in Support of Findings and Statement of Overriding Considerations

for

PLAN BAY AREA 2050+

Regional Transportation Plan (RTP)/ Sustainable Communities Strategy (SCS)

State Clearinghouse Number SCH# 2025010348

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March 2026

1 INTRODUCTION

1.1 ROLE OF THE FINDINGS

The following findings are hereby adopted by the Metropolitan Transportation Commission (MTC)[1] and Association of Bay Area Governments (ABAG)[2] Executive Board pursuant to the requirements of the California Environmental Quality Act, California Public Resources Code Section 21000 et seq. (CEQA), and the Guidelines for California Environmental Quality Act, Title 14, California Code of Regulations Section 15000 et seq. (CEQA Guidelines).

These Findings and Facts in Support of Findings relate to the 2026 approval of Plan Bay Area 2050+, the San Francisco Bay Area's long-range regional plan for transportation, housing, the economy, and the environment (final plan). The final plan's 35 integrated strategies across four key issues — transportation, housing, the economy, and the environment — chart a course to make the Bay Area more affordable, connected, diverse, healthy and vibrant for all residents, while also achieving regional greenhouse gas emissions reduction targets established by the California Air Resources Board pursuant to the Sustainable Communities and Climate Protection Act of 2008 (Senate Bill (SB) 375, Statutes of 2008).

The Findings state the Commission's and Board's conclusions regarding the significance of the potential environmental impacts of the final plan after all feasible mitigation measures have been adopted. These findings have been prepared to comply with the requirements of CEQA and the CEQA Guidelines and are based on information in the Draft and Final Environmental Impact Report (EIR) for the final plan and on all other relevant information contained in the administrative record for the final plan.

CEQA requires agencies to identify mitigation measures that would avoid or substantially lessen a project's significant impacts or potential significant impacts if such measures are feasible. The mitigation measures identified in the EIR mitigate the potential significant impacts of the final plan, to the extent feasible, as described in the EIR. All mitigation measures identified in the EIR (as listed in Table ES-1 of the Draft EIR and as amended in Section 3.0, "Revisions to the Draft EIR," of the Final EIR) are hereby adopted by the Commission and Board. Because the final plan contemplates projects that would be developed by other agencies throughout the region, MTC and ABAG find that the implementation of some mitigation measures is not within their authority. These measures can and should be implemented and monitored by the agencies responsible for implementing and overseeing individual projects. When MTC and/or ABAG are the lead agencies on a project, they will ensure compliance with the identified mitigation measures by requiring them as conditions of approval for relevant projects, and if applicable, requiring individual projects to undergo CEQA compliance review prior to project approval.

The ability of MTC and ABAG to enforce mitigation measures identified within the EIR is expressly limited by statute. SB 375[3] provides that the final plan cannot "regulat[e] the use of land… [and does not] supersed[e] the exercise of the land use authority of cities and counties within the region." (Gov. Code, § 65080, subd. (b)(2)(K).) For this reason, unless MTC or ABAG have regulatory or approval authority over a future

1 As used herein, "MTC" refers to the agency as a whole, while the "Commission" refers to MTC's legislative body (i.e., the MTC Commissioners).

2 As used herein, "ABAG" refers to the agency as a whole, while the "Board" refers to ABAG's legislative body (i.e., the Executive Board).

3 Senate Bill 375, also known as "The Sustainable Communities and Climate Protection Act of 2008."

transportation project (including bike and pedestrian facilities) implemented pursuant to the final plan, MTC and ABAG must rely on the CEQA streamlining incentives made available by statute to encourage implementing agencies to commit to the mitigation measures set forth in the EIR for the final plan. Similarly, an implementing agency that elects to take advantage of the CEQA streamlining provisions of SB 375 (Public Resources Code sections 21155.1, 21155.2, and 21159.28) must commit to the mitigation measures set forth in the EIR, as applicable and feasible, to address site-specific conditions. Therefore, as set forth in these Findings and more fully in the EIR, where it cannot be ensured that a mitigation measure would be implemented in all cases due to the statutory limitations on the authority of MTC and ABAG pursuant to SB 375, MTC and ABAG have concluded the impacts remain potentially significant. However, where existing regulatory requirements or permitting requirements exist, it is assumed that since these regulations are law and binding on all implementing agencies and project sponsors, it is reasonable to determine that they would be implemented, thereby reducing certain impacts to less than significant notwithstanding the limitations on MTC and ABAG's authority. (See *Oakland Heritage Alliance v. City of Oakland* (2011) 195 Cal.App.4th 884, 906 ["a condition requiring compliance with regulations is a common and reasonable mitigation measure and may be proper where it is reasonable to expect compliance"].)

By adopting the mitigation measures listed in the EIR and establishing a Mitigation Monitoring and Reporting Program (included as Attachment B to MTC Resolution No. 4485 and Exhibit 2 to ABAG Resolution No. 09-21) to ensure implementation of these mitigation measures, MTC and ABAG will ensure the corresponding significant impacts within their jurisdiction are avoided or reduced to the maximum extent feasible. Future projects must comply with CEQA, including implementation of project-specific mitigation measures where applicable and feasible. (Public Resources Codes section 21155.2, subdivision (a); CEQA Guidelines section 15168, subdivision (c)(3).)

Subsequent environmental review for specific projects identified in the final plan may tier off the programmatic analysis or incorporate information from this analysis by reference (CEQA Guidelines, Sections 15150, 15152, and 15168). A project specific EIR that tiers off the EIR for the final plan must incorporate the mitigation measures set forth in the EIR where applicable and feasible (See, e.g., CEQA Guidelines, Section 15168, subd. (c)(3)). The potential streamlining benefits included in SB 375 provide local agencies and project proponents with an incentive to propose projects that are consistent with the final plan and that incorporate applicable and feasible mitigation measures from the Program EIR.

The Statement of Overriding Considerations explains MTC's-ABAG's reasons for approving the final plan, even though the final plan will have significant and unavoidable impacts on the environment.

1.2 SCOPE OF THE ENVIRONMENTAL ANALYSIS

As required under state law, and pursuant to the role of a regional planning body, the final plan provides a regional blueprint or strategy to better accommodate the region's projected growth in an equitable and efficient manner and in partnership with local governments who still retain local land use control, through coordinated land use and transportation policies, projects, and public investments. The regional forecast projects overall changes in economic activity, population growth and composition for the region, as well as household growth and composition.

The EIR, in compliance with CEQA, is designed to inform decision-makers, other responsible agencies, and the public of the environmental consequences of implementation of the final plan. In accordance with CEQA, the EIR identifies regional effects of the implementation of projects that could follow adoption of the final plan. As a program-level EIR that addresses the entire nine-county, 101-city region, impacts of individual land use, sea level rise, or transportation projects are not addressed in site-specific detail; the focus of this analysis is on addressing the impacts of implementation of the final plan at a programmatic level.

The analysis in the EIR considers the impacts of the final plan in terms of the forecasted land use development pattern ("land use growth footprint"), sea level rise adaptation infrastructure ("sea level rise adaptation footprint"), and transportation projects and programs ("transportation projects footprint"). The impact discussions generally disclose the potential effects of the final plan at the regional level, which covers the Bay Area as a whole, and at the county level, which covers each Bay Area County.

1.3 ORGANIZATION

This document identifies the Findings and Facts in Support of Findings regarding recirculation of the Draft EIR, as well as findings for each potentially significant impact identified in the Draft EIR, and findings regarding mitigation measures and alternatives proposed during the public comment period on the Draft EIR. This document identifies the Findings for Alternatives, briefly summarizing the alternatives discussed in the Draft EIR and making findings with respect to their feasibility and whether each alternative would lessen the significant environmental effects of the final plan. This document also includes a Statement of Overriding Considerations setting forth the specific reasons supporting MTC's and ABAG's actions in approving the final plan despite its significant environmental impacts and concludes with a finding on the Commission's and Board's independent review and analysis of the EIR.

The findings set forth in the following sections state the Commission's and Board's reasons for making each finding and the rationale connecting the evidence to its conclusions. All records and materials constituting the record of the proceedings upon which these Findings are made are located at the Bay Area Metro Center, MTC Public Information, 375 Beale Street, Suite 800, San Francisco, California, 94105. A list of documents relied on for the EIR, Findings, alternatives analysis, and the Commission's and Board's ultimate decision on the final plan is included at the end of this document as the Record of Proceedings.

2 FINDINGS AND FACTS IN SUPPORT OF FINDINGS

2.1 CEQA REQUIREMENTS

The EIR identifies significant effects on the environment, which may occur because of the projects contemplated by the final plan.

Public Resources Code Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would *substantially lessen* the significant environmental effects of such projects[.]" (Emphasis added.) The same section states that the procedures required by CEQA "are intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will *avoid or substantially lessen* such significant effects." (Emphasis added.) Section 21002 goes on to state that "in the event [that] specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof." (Pub. Resources Code, Section 21002.)

The mandate and principles set forth in Public Resources Code Section 21002 are implemented, in part, through the requirement that agencies must adopt findings before approving projects for which EIRs are required. (See Pub. Resources Code, Section 21081, subd. (a); CEQA Guidelines, Section 15091, subd. (a).) Specifically, Section 15091 of the CEQA Guidelines establishes the following requirements for findings:

No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

1. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (CEQA Guidelines, Section 15091(a)(1).)

   [This finding shall be referred to herein as "Finding (1)."]

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency. (CEQA Guidelines, Section 15091(a)(2).)

   [This finding shall be referred to herein as "Finding (2)."]

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR. (CEQA Guidelines, Section 15091(a)(3).)

   [This finding shall be referred to herein as "Finding (3)."]

As stated in Finding (2), some of the identified significant effects can be fully avoided or substantially lessened through another agency's adoption of the mitigation measures set forth in the EIR. SB 375 makes clear that the legislation shall not be interpreted as superseding the land use authority of cities and counties. SB 375 does not require "a city's or county's land use policies and regulations, including its general plan, to be consistent with the regional transportation plan or an alternative planning strategy." (Government Code, Section 65080(b)(2)(K).) MTC and ABAG cannot compel future lead agencies to adopt specific mitigation measures in approving land use projects. It is, therefore, the responsibility of each subsequent lead agency to independently review the identified mitigation measures and make a determination of the applicability and feasibility of each measure for a specific project.

Pursuant to Public Resources Code Sections 21155.2(a) and (b)(2) and Section 21159.28(a), in order to take advantage of CEQA streamlining benefits allowed under SB 375, projects that seek to tier from the EIR must incorporate the mitigation measures identified in the Mitigation Monitoring and Reporting Program or, if the identified mitigation is found to be infeasible based on substantial evidence, the project must incorporate equivalent measures that avoid or mitigate potential impacts.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Project modifications or alternatives are not required, however, where such changes are infeasible or where the responsibility for modifying the project lies with some other agency. (CEQA Guidelines, Section 15091, subd. (a), (b).) Public Resources Code Section 21061.1 defines "feasible" to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." CEQA Guidelines Section 15364 adds another factor: "legal" considerations. (See also *Citizens of Goleta Valley v. Board of Supervisors (Goleta II)* (1990) 52 Cal.3d 553, 574-75 [concluding whether project applicant owned alternative site for project was an appropriate legal and economic factor to consider].) Moreover, judicial decisions have held "desirability" is also an appropriate consideration. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417 ["'[F]easibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors"]; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 998 [same].)

Here, even with MTC and ABAG adoption of the mitigation measures identified in the Final EIR, it may not be feasible to substantially lessen or avoid significant impacts. Finding (3) is used herein where (i) the impact remains significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt the mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation, making implementation by MTC and ABAG infeasible, or (ii) even with implementation of mitigation measures, because site conditions are unique, MTC and ABAG cannot conclude with certainty that all significant impacts could be avoided and no additional feasible measures are available.

With respect to a project for which significant impacts are not avoided or substantially lessened, a public agency, after adopting proper findings, may nevertheless approve the project if the agency first adopts a statement of overriding considerations setting forth the specific reasons why the agency found that the project's "benefits" rendered "acceptable" its "unavoidable adverse environmental effects." (CEQA Guidelines, Section 15093, 15043, subd. (b); see also Pub. Resources Code, Section 21081, subd. (b).) The California Supreme Court has stated, "[t]he wisdom of approving... any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Goleta II*, *supra,* 52 Cal.3d at p. 576.)

For purposes of these findings, the term "avoid" refers to the effectiveness of one or more mitigation measures in reducing an otherwise significant effect to a less-than-significant level. In contrast, the term "substantially lessen" refers to the effectiveness of such measure or measures in substantially reducing the severity of a significant effect, but not to a less-than-significant level. Although CEQA Guidelines Section 15091 requires only that approving agencies specify that a particular significant effect is "avoid[ed] or substantially lessen[ed]," these findings, for purposes of clarity, in each case specify whether the effect in question has been reduced to a less than significant level, or has simply been substantially lessened but remains potentially significant.

These findings constitute the Commission's and Board's best efforts to set forth the evidentiary and policy basis for its decision to approve the final plan in a manner consistent with the requirements of CEQA. To the extent these findings conclude that various proposed mitigation measures outlined in the EIR are feasible, within its responsibility and jurisdiction, and have not been modified, superseded, or withdrawn, the Commission and Board hereby bind MTC and ABAG to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations.

2.2 FINDINGS REGARDING RECIRCULATION OF THE DRAFT EIR

Under Section 15088.5 of the CEQA Guidelines, recirculation of an EIR is required when "significant new information" is added to the EIR after public notice is given of the availability of the Draft EIR for public review but prior to certification of the Final EIR. The term "information" can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement. "Significant new information" requiring recirculation includes, for example, a disclosure showing that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. The above standard is "not intend[ed] to promote endless rounds of revision and recirculation of EIRs." (*Laurel Heights Improvement Assn. v. Regents of the University of California* (1993) 6 Cal. 4th 1112, 1132) "Recirculation was intended to be an exception, rather than the general rule." (*Ibid*.)

CEQA case law emphasizes that "'[t]he CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new, and unforeseen insights may emerge during investigation, evoking revision of the original proposal.'" (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 736-737; see also *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 335-336; *River Valley Preservation Project v. Metropolitan Transit Development Bd*. (1995) 37 Cal.App.4th 154, 168, fn. 11.) "'CEQA compels an interactive process of assessment of environmental impacts and responsive project modification which must be genuine. It must be open to the public, premised upon a full and meaningful disclosure of the scope, purposes, and effect of a consistently described project, with flexibility to respond to unforeseen insights that emerge from the process.' [Citation.] In short, a project must be open for public discussion and subject to agency modification during the CEQA process." (*Concerned Citizens of Costa Mesa, Inc. v. 33rd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 936; *Citizens for East Shore Parks v. State Lands Com*. (2011) 202 Cal.App.4th 549, 563 ["Administrative agencies not only can, but should, make appropriate adjustments… as the environmental review process unfolds."].)

The Draft EIR analyzed impacts associated with the draft (also referred to in the EIR as "proposed") plan released October 20, 2025. Since the release of the Draft Plan and Draft EIR, in response to public comments, MTC and ABAG considerations, and continued staff analysis, there have been several text changes to the Draft Plan. The changes have been incorporated into the final plan and supplemental reports, which are available on the Plan Bay Area 2050+ website at https://planbayarea.org/finalplan.

The changes incorporated into the final plan include clarifications, corrections and elaborations to the text, figures and tables of the plan and the supplemental reports. **Table A1** summarizes changes made between the October 2025 release of the Draft Plan and supplemental reports and the March 2026 release of the final plan and supplemental reports.

The changes incorporated into the final plan do not alter any of the planning assumptions (Regional Growth Forecast, Financial Forecasts or Growth Geographies), strategies, or the corresponding project footprints (land use growth, sea level rise adaptation or transportation projects) discussed in Sections 2.2.3 and 3.1.3 of and analyzed throughout the Draft EIR. Similarly, proposed changes to the Implementation Plan chapter include the addition of detail, specified commitments to action and timing. The intent of the Implementation Plan chapter is to provide guidance on how the final plan's 35 strategies are implemented through a series of "near-term actions." Therefore, the changes incorporated into the Implementation Plan chapter do not alter the EIR's analysis of the potential impacts of implementing the plan's 35 strategies discussed in Section 2.2.2 of the Draft EIR.

Table A1: Changes Incorporated into the final Plan Bay Area 2050+ and Supplemental Reports

Document	Revision
Plan Bay Area 2050+	Additional context added on autonomous vehicles and the Resilience Project List, as well as an introductory Executive Letter. Updated Implementation Plan actions (see Implementation Plan Report below). Updated technical information based on newly available data from the California Air Resources Board, reflecting recent federal regulatory actions. Refreshed engagement numbers added following Round 4 engagement. Minor updates to maps and to address typos, citations and formatting.
Equity Analysis Report	Added context noting that the report's Title VI equity analysis follows existing guidance, which FTA has indicated is out-of-date and will be updated in the near term to align with the Department of Justice's revised regulations in accordance with Executive Order 14821.
Forecasting and Modeling Report	Added more background information on the Regional Growth Forecast, including history, current statutory requirements, methodology, and relationships with the California Department of Finance population forecast and with the Regional Housing Needs Allocation (RHNA). Added additional modeling metrics and documentation from Travel Model 1.6. Minor updates to maps and citations.
Implementation Plan Report	Added one new implementation action: "Action 61, Convene a technical advisory committee to review and update the Regional Growth Forecast Methodology." Merged two implementation actions associated with the Create Healthy and Safe Streets theme to reflect the full range of active transportation and Vision Zero initiatives in a single action; the new merged action is: "Action 21, Improve street safety and expand active transportation through a package of technical assistance offerings." Moderately refined seven actions (2, 3, 31, 34, 35, 48 and 64), resulting in small changes to scope and/or more substantial revisions to action descriptions based on input received during the public comment period. Made minor edits to 27 actions that did not alter the scope of the action but sought to improve clarity and consistency. No significant edits.
Performance Report	Updated technical information based on newly available data from the California Air Resources Board, reflecting recent federal regulatory actions.
Public Engagement Report	Content will be added to reflect Round 4 engagement activities conducted since the release of Draft Plan Bay Area 2050+.
Resilience Project List Report	This report centralizes Resilience Project List information from the Draft Technical Assumptions Report, the Transportation and Resilience Project List Briefer, the Final Blueprint Resilience Project List and other Draft Plan Bay Area 2050+ products. No new information was produced for this report after the release of Draft Plan Bay Area 2050+.

Document	Revision
	The two edits to the Resilience Project List between the Draft Plan and final plan did not change the environmental impact or cost of Strategy EN1 – Adapt to Sea Level Rise. The SR-37 project was separated into two components to clarify anticipated near-term activities, and the Pacifica Sea-Level Rise Adaptation Plan Adaptation Options project was broken into subcomponents to clarify near- and long-term projects.
Statutorily Required Plan Maps Report	Updated description of Natural Lands maps to reflect the connection between the Bay Area conservation lands with the California State Wildlife Action Plan. Update to Map 4 (change in household density) to reflect accurate data.
Technical Assumptions Report	Added clarifying language on consistency between state funding assumptions used in the plan and state funding estimates, as well as road pricing revenues. Updated language in the Environment Element chapter to reflect inclusion of the Resilience Project List Report.
Transit 2050+ Report	Incorporated changes made to other reports, including the minor updates to the Transportation Project List Report described below and Implementation Plan Report described above.
Transportation-Air Quality Conformity Report	Updated summary of consultation and public engagement processes. Added summary of latest planning assumptions table; updated documentation of travel model updates. Added Appendix H: Response to Public Comments and adjusted numbering from other appendices. Minor updates to address typos, references and formatting.
Transportation Project List Report	Added bike highways as a programmatic investment type within Strategy T9. Expanded the discussion on goods movement and the regional trail network. Clarification language added under Strategy EN1 on sea level rise adaptation and the role of external plans in shaping Plan Bay Area 2050+ strategies. Minor updates to address typos and revise formatting.
Tribal Engagement Report	Content will be added to reflect Round 4 engagement activities conducted since the release of Draft Plan Bay Area 2050+.

There have also been modifications to the Draft EIR, as identified in Chapter 3 of the Final EIR. Some of the changes were made in direct response to comments raised on the Draft EIR and provide clarifications and modifications to address commenters' requests, as described in more detail below. Other changes were initiated by MTC and ABAG staff, following the release of the Draft EIR. Specifically, air quality and greenhouse gas emissions were reanalyzed using the latest emissions tools between the Draft and Final EIR.

As described in greater detail in "Chapter 3: Revisions to the Draft EIR," in May 2025, Congress adopted joint resolutions under the Congressional Review Act that were signed into law on June 12, 2025. These resolutions overturned U.S. Environmental Protection Agency (EPA) waivers that had allowed California to implement and enforce several vehicle emissions regulations. The affected regulations include the Advanced Clean Cars (ACC) II Program, the Advanced Clean Trucks regulation, and the Heavy-Duty Omnibus

regulation. Similarly, other California emissions regulations requiring waivers under the federal Clean Air Act (CAA) are also impacted, including the Zero-Emission Airport Shuttle regulation and the Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1).

As a result of these federal regulations, the affected State regulations can no longer be enforced by the State or counted toward federal air-quality planning requirements under the CAA. In response, the California Air Resources Board (CARB) developed emissions adjustment factors to remove the estimated emissions benefits attributed to the Advanced Clean Trucks, ZeroEmission Airport Shuttle, Heavy-Duty Vehicle and Engine Emission Warranty and Maintenance Provisions (Warranty Phase 1), and Heavy-Duty Omnibus (Omnibus) regulations from the modeling tool used to estimate air quality and greenhouse gas emissions, EMFAC2021.

On October 31, 2025, CARB submitted a letter to the EPA requesting approval of these off-model adjustment factors. On November 21, 2025, EPA approved the use of EMFAC2021 with the adjustment factors for State Implementation Plan (SIP) development and transportation conformity determinations. The approved adjustment factors revised emissions for reactive organic gases (ROG), nitrogen oxides (NO_X) and fine particulate matter ($PM_{2.5}$ and PM_{10}).

Similarly, in January 2026, CARB released additional EMFAC2021 adjustment factors to remove the benefits of the aforementioned State programs to estimate revised emissions of greenhouse gases, including carbon dioxide (CO_2), methane (CH_4) and nitrous oxide (N_20). The greenhouse gas adjustment factors for EMFAC2021 are not subject to EPA approval.

Notably, these adjustment factors were developed for the EMFAC2021 model rather than the more recent EMFAC2025 model version, not yet approved by EPA for use in SIP development and transportation conformity determinations. In addition, MTC anticipates that the use of EMFAC2025 could result in underestimating future emissions due to its inclusion of the aforementioned State policies. Therefore, the older EPA-approved EMFAC2021 model was used and is considered a suitable model to determine project-related air quality and greenhouse gas emission impacts.

Given these considerations, use of the EMFAC2021 model in combination with the adjustment factors developed by CARB serves as the most current methodology available at the time of the writing of this analysis to calculate mobile source emissions. Accordingly, the emissions estimates presented in Tables 3.4-10 (EMFAC2021), 3.4-11 (EMFAC2017), 3.6-10 (EMFAC2021), 3.6-11 (EMFAC2017) and 3.6-12 (EMFAC2021), and the accompanying text within the analysis, were updated to incorporate the EMFAC2021 adjustment factors.

The changes in total emissions from implementation of the plan do not reflect any changes in the final plan land use and transportation strategies, nor any changes made by MTC and ABAG. Rather, the changes in emissions are the result of the federal actions. While there would be minor changes in the emissions modeling outputs as a result of modeling adjustment, these changes do not alter the conclusions of the EIR with respect to the significance of impacts or substantially change the severity of significant impacts; nor do the refinements present new information not previously included in the Draft EIR.

Air Quality Revisions

As described in Final EIR "Chapter 3: Revisions to the Draft EIR," and incorporated herein by reference, the updated modeling results are within the range of emissions estimated in Section 3.4, "Air Quality" of the Draft EIR using both EMFAC2017 and EMFAC2021, with the exception of the estimated emissions of daily tons of operational summertime ROG, as well as $PM_{2.5}$ and PM_{10}.

While the air quality modeling adjustment would result in increases in the emissions for those pollutants estimated in the Draft EIR, the plan would still result in an overall decrease of air quality emissions for ROG

and a minimal increase in particulate matter emissions in 2050 compared to 2023. As shown in the Final EIR, the model revisions affecting air quality emissions results are not considered new information as defined in Section 15088.5 of the CEQA Guidelines, because they do not change any impact significance conclusions or result in a substantial increase in the severity of impacts; nor do the refinements present new information not previously included in the Draft EIR.

Greenhouse Gas Revisions

As described in Final EIR "Chapter 3: Revisions to the Draft EIR," and incorporated herein by reference, based on the modeling adjustment, GHG emissions in 2050 would be higher than reported in the Draft EIR; however, there would still be an overall decrease in emissions from implementation of the plan. Importantly, the change does not result in an exceedance of any significance threshold, and goals and objectives of the plan would still be met under the statutory requirements of SB 375. There would be no change in the impact significance conclusions because GHG emissions would still decrease from plan implementation, would be less than the baseline, and would be less than if the plan were not implemented.

As shown in the Final EIR, the model revisions affecting GHG emissions results are not considered new information as defined in Section 15088.5 of the CEQA Guidelines, because they do not change any impact significance conclusions or result in a substantial increase in the severity of impacts; nor do the refinements present new information not previously included in the Draft EIR.

Of the text changes listed in the Final EIR: one (1) includes minor revisions to the Project Description; approximately 28 make minor clarifications and corrections to environmental and regulatory setting information; two (2) include the addition of a reference document; approximately fifteen (15) include minor clarifications to text in impact discussions as a result of comment letters; eleven (11) include minor corrections to impact discussions as a result of the modeling revisions for air quality; fifteen (15) include minor corrections to impact discussions as a result of modeling revisions for greenhouse gas emissions; none include the addition of text to existing mitigation measures; and one (1) includes clarifications to alternatives discussions.

As explained in each of the corresponding responses to comments in "Chapter 2: the revisions and clarifications made in responses to comments serve to amplify and add detail to the existing discussion in the Draft EIR, including the environmental setting and environmental impacts

As demonstrated in the Final EIR, and summarized above, the revisions to the Draft EIR do not fall into any of the four circumstances identified by CEQA as triggering recirculation. MTC and ABAG have determined that the provisions of Section 15088.5 of the CEQA Guidelines are not triggered and recirculation of this EIR is not required.

The Commission and Board hereby find that the changes made to the final plan clarify and/or correct the text of the final plan, but do not result in any changes that would have environmental effects. The potential impacts from the final plan fit within the range of impacts analyzed in the EIR. There are no substantial changes in the final plan or the circumstances under which the final plan is being undertaken, that necessitate revisions of the EIR. Nor has new information become available. The final plan does not result in any new impacts, nor does it cause the level of significance for any previously identified impacts to change. The circumstances, impacts, and mitigation requirements identified in the EIR remain applicable to the final plan and support the finding that the final plan does not raise any new issues and does not cause the levels of impacts identified in the EIR to be exceeded.

Further, the changes to the Draft EIR described in the Final EIR and in these Findings supplement or clarify the existing language. Clarifications and corrections to the text, tables, and figures do not alter the conclusions of the Draft EIR.

In sum, no changes made to the final plan or the EIR since release of the Draft EIR involve "significant new information" triggering recirculation because the changes do not result in any new significant environmental effects, any substantial increase in the severity of any previously identified significant effects or otherwise trigger recirculation. Instead, the modifications are either environmentally benign or environmentally neutral and thus represent the kinds of changes that commonly occur as the environmental review process works towards its conclusion. The Commission and Board hereby determine, based on the standards provided in Section 15088.5 of the CEQA Guidelines, that recirculation of the Draft EIR is not required.

2.3 FINDINGS REGARDING THRESHOLDS OF SIGNIFICANCE FOR ENVIRONMENTAL DETERMINATIONS

CEQA requires a lead agency to determine the significance of all environmental impacts (Public Resources Code Section 21082.2; CEQA Guidelines Section 15064). A threshold of (or criteria for) significance for a given environmental impact defines the level of effect above which the lead agency will consider impacts to be significant, and below which it will consider impacts to be less-than-significant and therefore acceptable. Thresholds of significance may be defined either as quantitative or qualitative standards, or sets of criteria, whichever is most applicable to each specific type of environmental impact. For example, quantitative criteria are often applied to traffic, air quality, and noise impacts, while aesthetics impacts are typically evaluated using qualitative thresholds. Lead agencies have discretion to formulate their own significance thresholds. Setting thresholds requires the lead agency to make a policy judgment about how to distinguish significant impacts from less-than-significant impacts. Lead agencies can set thresholds on a project-by-project basis, or they can informally or formally adopt thresholds to be consistently applied to all projects.

Lead agencies are responsible for determining the thresholds of significance for all CEQA documents they prepare. They can rely on several sources, including: Appendix G of the CEQA Guidelines; CEQA's mandatory findings of significance (CEQA Guidelines Section 15065); thresholds established by regulatory agencies; thresholds provided in General Plans or other local planning documents; or thresholds established by other agencies. For example, many jurisdictions rely on thresholds established by a local or regional air district when analyzing air quality impacts. Appendix G is the most common source, though lead agencies are not required to use it and are free to develop their own thresholds. Lead agencies are encouraged in the CEQA Guidelines (Section 15064.7(a)) to develop and formally adopt thresholds of significance, though this is not a requirement. Thresholds used solely for a specific project are not required to be adopted by ordinance or other formal means.

The significance thresholds criteria used in the EIR are consistent with the requirements of CEQA and, where noted, CEQA Guidelines Appendix G. MTC and ABAG hereby affirm the use of these significance thresholds for the purpose of analyzing the potential for environmental impacts that could result from adoption and implementation of the final plan.

2.4 FINDINGS REGARDING SIGNIFICANT EFFECTS AND MITIGATION MEASURES

The following subsection lists each significant or potentially significant environmental impact by issue area in the order it appears in the EIR, the mitigation measures identified for each impact in the EIR, the CEQA Finding or Findings applied by the Commission and Board, and the Facts in Support of each Finding. The facts in support of each finding are a summary of the facts and analysis contained in the EIR and in the Record of Proceedings, including compliance with all relevant existing laws, policies, and regulations, as summarized in the Regulatory Setting sections for each impact area addressed in the EIR. This discussion

does not attempt to describe the full analysis of each environmental impact contained in the EIR. A full documentation of the environmental analysis and conclusions is in the EIR, and the Record of Proceedings identified at the end of this document and incorporated herein by reference.

In these findings, MTC and ABAG discuss each potentially significant environmental impact analyzed in the EIR. For each potentially significant environmental impact, MTC and ABAG summarize the level of significance before mitigation, the level of significance after mitigation, the mitigation measure(s), and findings regarding significance after mitigation is implemented. Where an impact was determined to be less-than-significant (LTS) in the EIR, no discussion of the impact is provided in these findings because PRC Section 21081 and CEQA Guidelines Section 15091 do not require findings of fact for impacts that are less-than-significant.

The Commission and Board have determined the adoption of feasible mitigation measures, alternatives, and proposals incorporated into the final plan will reduce impacts to some extent, but in some instances the impact will not be reduced to a level that is deemed "less than significant." Thus, some impacts remain Significant and Unavoidable. The Statement of Overriding Considerations contains additional information explaining the reasons for the Commission's and Board's decision to approve the final plan despite potentially significant environmental effects that MTC and ABAG cannot mitigate or ensure will be mitigated by implementing agencies to less-than-significant levels.

2.4.1 Aesthetics and Visual Resources (3.2)

IMPACT

AES-1 Have a substantial adverse effect on a scenic vista (Draft EIR, p. 3.2-10)

Mitigation Measures

AES-1 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity.
- Site or design projects to minimize their intrusion into important viewsheds. Measures to achieve this could include, but are not limited to, requiring that the scale and massing of new development in higher-density areas provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods that have lower development intensities and building heights, and ensuring building heights are stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to protect scenic vistas and scenic resources.
- Design projects to minimize the potential to obscure, detract from, or negatively affect the quality of views from state-designated scenic roadways or scenic highways.
- Use see-through safety barrier designs (e.g., railings rather than walls).
- Develop interchanges and transit lines at the grade of the surrounding land to limit view blockage.
- Where highway screening is a required element of a development, design landscaping along all highways, including state-designated scenic highways, locally designated scenic highways, and highway corridors in rural and open space areas to add natural elements and visual interest to soften

the hard-edged, linear travel experience that would otherwise occur. Retain or replace trees bordering highways so that clear-cutting is not evident.

- Identify, preserve, and enhance scenic vistas to and from hillside areas and other visual resources.

Significance After Mitigation

Mitigation Measure AES-1 would reduce significant impacts to scenic vistas because it would modify site design and provide development recommendations that would minimize visual intrusion on important viewsheds. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant viewshed impacts could be avoided. Therefore, there may still be instances in which viewshed impacts are substantially altered. This impact would remain **significant and unavoidable (SU)**.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (CEQA Guidelines, Section 15091(a)(1).) (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. Strategies EN04 and EN05 would protect existing scenic resources, including scenic views, located within open space lands, agricultural lands, wildland-urban interface lands, and Priority Conservation Areas (PCAs).

B. Denser or more compact development in the final plan's Growth Geographies may block panoramic views or views of landscape features or landforms from public and individual properties because increasing densities on existing footprints could result in taller buildings and/or buildings placed more closely together. Therefore, depending on the location of the viewer, scenic vistas may be substantially altered, and short-range impacts on views of scenic vistas would be potentially significant (PS). (Draft EIR, p. 3.2-11)

C. Development of sea level rise adaptation projects, such as horizontal levees, marsh restoration, seawalls, and tidal gates, are unlikely to block or substantially alter views of scenic vistas because these types of structures would be located low to the ground and would not be of substantial height. However, development of sea level rise adaptation projects, such as vertical levees and elevated roadways and rail, could be tall enough to alter views of scenic vistas. Therefore, depending on the location of the viewer, scenic vistas may be substantially altered, and impacts on views of scenic vistas would be potentially significant (PS). (Draft EIR, p. 3.2-11)

D. Construction of transportation projects included in the final plan could take several months to several years and have the potential to result in long-term effects on scenic views from discrete locations depending on the size of projects. As discussed above for land use projects, construction of projects could directly alter a feature or be placed in a location such that the intensity and height of development would obstruct views. Transportation projects included in the proposed plan could require the removal of landscaping, temporary traffic changes, temporary signage, and construction staging areas. Larger projects, such as expansion of regional transit lines, and construction of train stations and parking structure could take long periods of time (e.g., several years) to complete, require substantial grading activities, and the prolonged presence of construction equipment and stockpiling of materials. As shown

in Figure 2-4 of the Draft EIR (see Chapter 2, "Project Description"), transportation projects are clustered in Santa Clara County around the densely populated areas of Santa Clara, downtown San Jose, and Milpitas; in central and western Alameda County; in San Mateo County around the City of San Mateo and South San Francisco and Contra Costa County around the City of Richmond. Due to the size and duration of some projects, construction may result in significant temporary impacts to scenic vistas (PS). (Draft EIR, p. 3.2-12)

E. Upon completion, the extent to which there would be impacts on scenic vistas from new transportation projects would depend on the type of project and its location relative to specific vantage point of viewers. For example, bicycle and pedestrian projects, such as sidewalk and roadway striping, are unlikely to have adverse impacts on scenic vistas because these types of projects would not require earth moving activities that would result in physical changes to the environment. Many of the other major transportation projects would not substantially alter the Bay Area at a regional scale such that scenic views could be substantially altered because the expected appearance of arterials, highways, and local and regional transit systems would remain generally the same at a regional scale as under the existing conditions. However, new features such as new travel lanes or rail lines, large signs, new intersections, and new stations could be placed in a location such that the intensity and height of development may block public views of landscape features or landforms. Therefore, scenic vistas could be substantially altered because of new transportation infrastructure. This impact would be potentially significant (PS). (Draft EIR, pp. 3.2-12 to 3.2-13)

F. Mitigation Measure AES-1 would reduce significant impacts to scenic vistas because it would modify site design to minimize visual intrusion on important viewsheds and require landscaping and trees where highway screening is required along highway corridors. It would also require reduced visibility of construction staging areas and revegetation of exposed earth surfaces at the earliest opportunity.

IMPACT

AES-2 Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway (Draft EIR, p. 3.2-14)

Mitigation Measures

AES-2 Implement Mitigation Measure AES-1.

Significance After Mitigation

Mitigation Measure AES-2 would reduce significant impacts on visual resources within a state-designated scenic highway because it involves modifying site design and providing development recommendations that would minimize visual intrusion. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant visual resource impacts could be avoided. Therefore, there may still be instances in which visual resources along state-designated scenic highways are substantially altered. This impact would remain **significant and unavoidable (SU)**.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. Development adjacent to scenic highways could cause short-term visual impacts resulting from construction equipment and scaffolding, temporary lighting, and exposed excavation and slope faces. In general, construction-related impacts to scenic highways would be the same as those under Impact AES-1 relating to the blockage of views. Large projects are most likely to have significant impacts on scenic highways, but small projects could have substantial impacts depending on their duration. Generally, construction impacts would be less than significant because of their temporary nature; however, as noted, large or long duration projects could have significant impacts (PS). (Draft EIR, p. 3.2-14)

B. Pursuant to PRC Section 21099, aesthetic impacts of residential, mixed-use residential, or employment center projects located within TPAs are not considered significant environmental impacts. Therefore, the potential for visual impacts on scenic highways would result from dense, compact development projects located in less urbanized areas, and adjacent to scenic highways, which could damage scenic resources or create visual contrast between the project and existing conditions. The Scenic Highway Program managed by Caltrans to protect scenic highway corridors includes certain limits on land uses adjacent to the roadway, which are implemented at the local level. When nominating a scenic highway, Caltrans requires that the nominating agency adopt a CPP that includes regulation of land use and density of development; detailed land and site planning; control of outdoor advertising; careful attention to and control of earthmoving and landscaping; and the design and appearance of structures and equipment. These programs are included as part of the scenic highway designation, and Caltrans can revoke the designation if these programs are not followed. Cities and counties also have policies (e.g., general plan), regulations (e.g., zoning), and other guidance (e.g., design guidelines) that control the size and scale of new development to maintain visual compatibility with the natural and built environments. However, development adjacent to scenic highways could result in short-term and long-term impacts on resources along scenic highways. This impact would be potentially significant (PS). (Draft EIR, p. 3.2-14)

C. The implementation of sea level rise adaptation projects could result in the development of levees, seawalls, elevated roadways, marsh restoration, and tidal gates. These adaptation projects would be clustered in Sonoma County, followed by Marin, San Mateo, Alameda, Solano, and Santa Clara Counties. Sea level rise adaptation projects would be minimal in Contra Costa, Napa, and San Francisco Counties. As explained above, the presence of construction equipment would be temporary and would be removed following construction. Grading and earthwork for construction of adaptation projects such as horizontal levees, marsh restoration, seawalls, tidal gates, vertical levees, and elevated roadways and rail could result in the removal of trees and other vegetation and topographic disturbance. As noted above, the Scenic Highway Program managed by Caltrans to protect scenic highway corridors includes certain limits on land uses adjacent to the roadway, which would be implemented at the local level. When nominating a scenic highway, Caltrans requires that the nominating agency adopt a CPP that includes regulation of land use and density of development; detailed land and site planning; control of outdoor advertising; careful attention to and control of earthmoving and landscaping; and the design and appearance of structures and equipment. These programs are included as part of the scenic highway designation, and Caltrans can revoke the designation if these programs are not followed. Additionally, cities and counties have policies (e.g., general plan), regulations (e.g., zoning), and other guidance (e.g., design guidelines) that control the size and scale of new infrastructure to maintain visual compatibility with the natural and built environments. However, infrastructure placement adjacent to scenic highways could result in short-term and long-term impacts on resources along scenic highways. This impact would be potentially significant (PS). (Draft EIR, pp. 3.2-14 to 3.2-15)

D. Proposed transportation projects could impact portions of Bay Area highways that are designated as state scenic highways or that are eligible scenic highways. These projects could have adverse effects on the visual character of land adjacent to designated scenic highways or highways eligible for designation. Transportation projects subject to review by the Federal Transit Administration, Federal Railroad

Administration, or Federal Highway Administration would be subject to National Environmental Policy Act (NEPA) review and compliance with guidance related to visual resources such as the Federal Highway Administration (FHWA) Guidelines for the Visual Impact Assessment of Highway Projects (FHWA 2015). Therefore, because existing regulations would protect resources along scenic highways, impacts would be less than significant after construction. However, because substantial visual impacts may occur during construction and because construction of some projects may take years, this impact is potentially significant (PS). (Draft EIR, p. 3.2-15)

E. Mitigation Measure AES-2 would reduce significant impacts on visual resources within a State-designated scenic highway because it involves modifying site design to minimize visual intrusion on important viewsheds and require landscaping and trees where highway screening is required along highway corridors. It would also require reduced visibility of construction staging areas and revegetation of exposed earth surfaces at the earliest opportunity.

IMPACT

AES-3 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality (Draft EIR, p. 3.2-16)

Mitigation Measures

AES-3 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Require that the scale, massing, and design of new development provide appropriate transitions in building height, bulk, and architectural style that are sensitive to the physical and visual character of surrounding areas.
- Contour the edges of major cut and fill slopes to provide a finished profile that is appropriate to the surrounding context, using shapes, textures, colors, and scale to minimize contrasts between the project and surrounding areas.
- Require project sponsors to conduct shadow studies for four-story high (and higher) buildings and roadway facilities to identify and implement development strategies for reducing the impact of shadows on public open space, where feasible. Study considerations shall include, but are not limited to, the placement, massing, and height of structures, surrounding land uses, time of day and seasonal variation, and reflectivity of materials. Study recommendations for reducing shadow impacts shall be incorporated into the project design as feasible based on project- and site-specific considerations.

Significance After Mitigation

Mitigation Measure AES-3 would reduce significant impacts to visual character or quality because it would modify site design and provide development recommendations that would result in projects that would be consistent in appearance to their surroundings. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, because site conditions are unique within urban and non-urban areas, it cannot be concluded with certainty that all significant impacts to existing visual character could be avoided. Therefore, there may still be instances in which impacts to visual character are **significant and unavoidable (SU)**.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. At the regional scale, the greatest impacts would result from high density residential development and high intensity nonresidential projects located within existing communities where the visual contrast between the project and existing conditions would be the most apparent. Development outside of urban built-up lands could introduce dense compact development that would contrast with the existing character of the community. In many cases, the existing visual character within urban built-up lands would not be substantially altered because dense compact development would be similar to existing conditions. As required under state law, all cities and counties have policies (e.g., general plan), regulations (e.g., zoning), and other guidance (e.g., design guidelines) that control the size and scale of new development, which serves to maintain its visual compatibility with the natural and built environments. However, implementation of the proposed plan would increase density and intensity of growth in designated Growth Geographies to a level greater than currently planned, particularly in less urbanized areas. Therefore, the potential for impacts to visual character and quality is considered potentially significant (PS). (Draft EIR, p. 3.2-16)

B. Sea level rise adaptation projects would occur primarily in nonurbanized areas but could be located in areas subject to public views where viewer sensitivity is high. Grading and earthwork for construction of adaptation projects could result in the removal of trees and other vegetation and topographic disturbance, which would alter the existing character of the project sites. Therefore, this impact would be potentially significant (PS). (Draft EIR, p. 3.2-17)

C. Development of sea level adaptation projects, such as horizontal levees, marsh restoration, seawalls, and tidal gates, are unlikely to substantially degrade visual quality because these types of structures would be located low to the ground and would not be of significant height. However, development of sea level adaptation projects, such as vertical levees and elevated roadways and rail, could require greater tree removal or earthwork and could alter or degrade existing visual quality in the region depending on their location by introducing new built elements in existing natural landscapes or increasing the vertical profile of existing infrastructure. Therefore, the potential for impacts to visual character and quality is considered potentially significant (PS). (Draft EIR, p. 3.2-17)

D. Development of major above-ground transportation projects could result in substantial effects on the visual character in the region depending on their location and project type. Substantial regional projects that would add travel lanes to freeways, expressways, highways, or add new routes to fixed guideway transit facilities and would be located in already developed areas and would not constitute a significant change in visual character. However, the proposed plan's transportation projects that extend into non-urban areas or that expand existing rights-of-way could impact community character by increasing visual contrast within the community. Therefore, implementation of the proposed plan's major transportation projects would constitute a potentially significant impact (PS). (Draft EIR, p. 3.2-17)

E. Mitigation Measure AES-3 would reduce significant impacts to visual character or quality because it would require that projects would be compatible in appearance to their surroundings and implement strategies to reduce the impact of shadows on public spaces. (Draft EIR, p. 3.2-18)

IMPACT

AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area (Draft EIR, p. 3.2-18)

Mitigation Measures

AES-4 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Design projects to minimize light and glare from lights, buildings, and roadways facilities.
- Minimize and control glare from transportation projects through the adoption of project design features that reduce glare. These features include:
    - planting trees along transportation corridors to reduce glare from the sun;
    - landscaping off-street parking areas, loading areas, and service areas; and
    - shielding transportation lighting fixtures to minimize off-site light trespass.
- Minimize and control glare from land use and transportation projects through the adoption of project design features that reduce glare. These features include:
    - limiting the use of reflective materials, such as metal;
    - using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry;
    - screening parking areas by using vegetation or trees; and
    - using low-reflective glass.
- Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with land use development. These standards include the following:
    - minimizing incidental spillover of light onto adjacent private properties and undeveloped open space;
    - directing luminaries away from habitat and open space areas adjacent to the project site;
    - installing luminaries that provide good color rendering and natural light qualities; and
    - minimizing the potential for sky glow into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.

Significance After Mitigation

Mitigation Measure AES-4 would reduce significant impacts from light and glare because it would result in the modification of site design and would provide standards that would minimize the effects of light and glare. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact would be less than significant with mitigation (LTS-M). Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact remains **significant and unavoidable (SU)** for purposes of this program level analysis.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. Implementation of the final plan would result in the development of new residential or commercial structures that could result in substantial sources of light at the regional scale that cause a public hazard, disrupt scenic vistas, and brighten the night sky. Development projects resulting from the final plan could create new substantial sources of light and glare at the local scale. In addition, the introduction of new sources of light and glare could impact local visual resources by altering the local character of the built environment. High density residential and high intensity nonresidential development, in particular, could have substantial increases in light and glare at the local level. Overall, the impact of new sources of light and glare would be less than significant (LTS) in urban areas and potentially significant (PS) in rural areas. (Draft EIR, p. 3.2-18)

B. Transportation projects could result in marginal increases in light and glare from additional vehicle headlights, new reflective signage, new streetlights, new intersection control devices, and other lighting ancillary to transportation projects. Most improvements would take place on existing facilities that have existing sources of light, and many projects are clustered in urban areas where light and glare would be similar in character to existing light sources. It is not anticipated that these transportation projects would substantially increase the amount of light and glare. However, transportation projects located within rural areas could introduce light and glare to areas where no sources existed previously, which would constitute a potentially significant impact (PS). (Draft EIR, p. 3.2-19)

C. Mitigation Measure AES-4 would reduce significant light and glare impacts through requirements related to project design, shading and shielding, non- and low-reflective materials, and landscaping. Additionally, it would provide standards that would minimize the effects of light trespass and glare. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact would be less than significant with mitigation (LTS-M). (Draft EIR, p. 3.2-20)

2.4.2 Agriculture and Forestry Resources (3.3)

IMPACT

AGF-1 Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract (PS) (Draft EIR, p. 3.3-14)

Mitigation Measures

Mitigation Measure AGF-1 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- Require project relocation or corridor realignment, where feasible, to avoid agricultural land, especially Prime Farmland, Farmland of Statewide Significance, Unique Farmland, and land under a Williamson Act contract.
- Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, and to reduce conflict with farming that could result from implementation of transportation projects and/or the projected land use growth footprint included as a part of the RTP/SCS.
- Maintain and expand agricultural land protections such as urban growth boundaries.
- Achieve compensatory mitigation in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by the permitting agencies.
- Require acquisition of conservation easements on land in the same jurisdiction, if feasible, and at least equal in quality and size as mitigation for the loss of agricultural land.
- Institute new protection of farmland in the project area or elsewhere through the use of long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).

Significance After Mitigation

Implementation of Mitigation Measure AGF-1 would reduce the potentially significant impact of conversion of Farmland, lands zoned for agriculture or lands under Williamson Act contracts to other uses because it would require avoidance or compensation for converted lands. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above, as applicable, to address site-specific conditions. However, the mitigation would not ensure that the forecasted development pattern, sea level rise adaptation projects, and transportation projects could feasibly relocate or realign to avoid conversion of Farmland and conflict with lands zoned for agricultural use or lands under Williamson Act contract to a less-than-significant level. Accordingly, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (CEQA Guidelines, Section 15091(a)(1).) (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy.

B. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

C. The final plan's land use growth footprint could have the potential to convert Prime or Farmland of Statewide Importance or Unique Farmland and conflict with existing zoning for agricultural use or Williamson Act contracts. The potential conversion of Farmland and conflict with lands zoned for agricultural use or lands under Williamson Act contracts would be potentially significant (PS). (Draft EIR, p. 3.3-16)

D. Implementation of the final plan's sea level adaptation infrastructure has the potential to convert lands zoned for agriculture and lands under Williamson Act contract thought the extent of conversion would depend on the final scale and design of proposed adaptation infrastructure. This impact would be potentially significant (PS). (Draft EIR, pp. 3.3-17 to 3.3-18)

E. The final plan's transportation projects footprint could have the potential to convert Prime Farmland, Unique Farmland, and Farmland of Statewide Importance as well and conflict with existing zoning for agricultural use or Williamson Act contracts. The likelihood of Farmland conversion increases where transportation projects are located at the edges of existing urban areas, along waterways, or over hills separating urban areas. The extent of this area would depend on the final scale and design of transportation projects. The majority of the potential Farmland conversion would occur in Sonoma County. The potential conversion of Farmland acreage and conflict with lands zoned for agricultural use or lands under Williamson Act contract due to implementation of transportation projects under the proposed plan would be potentially significant (PS). (Draft EIR, pp. 3.3-18 to 3.3-19)

F. Implementation of Mitigation Measure AGF-1 would reduce the potentially significant impact of conversion of Farmland, lands zoned for agriculture, and lands under Williamson Act contracts to other uses because it would require avoidance or compensation for converted lands. (Draft EIR, p. 3.3-19)

IMPACT

AGF-2 Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]) (Draft EIR, p. 3.3-20)

Mitigation Measures

AGF-2 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- Require project relocation or corridor realignment, where feasible, to avoid land zoned for forest land or timberland.
- Maintain and expand forest land protections such as urban growth boundaries.
- Achieve compensatory mitigation in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by the permitting agencies.
- Require acquisition of conservation easements on land at least equal in quality and size as mitigation for the loss of forest land or timberland.

Significance After Mitigation

Implementation of Mitigation Measure AGF-2 would reduce the potentially significant impact related to conflict with zoning or rezoning of land zoned for forest land or timberland because it would require avoidance or compensation for converted lands. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above, as applicable, to address site-specific conditions. However, because the mitigation would not ensure that the land use growth footprint, sea level rise adaptation projects, or transportation projects could

feasibly relocate or realign to avoid lands zoned as forest land or timberland and because compensation may not adequately reduce the impact to a less-than-significant level, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (CEQA Guidelines, Section 15091(a)(1).) (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts on forest land or timberland. Some Bay Area cities have urban growth boundaries, which help to protect natural lands such as forest land and timberland. However, implementation of the final plan's land use growth footprint could conflict with the existing zoning for forest land, timberland, or Timberland Production. The potential conversion would be potentially significant (PS). (Draft EIR p. 3.3-20)

B. The final plan anticipates a 4.9-foot inundation along the shoreline communities from sea level rise. Strategy EN1, “Adapt to Sea Level Rise,” would protect shoreline communities affected by sea level rise inundation by identifying a series of adaption projects reflected in the Sea Level Rise Resilience Project list. Implementation of sea level rise adaptation projects could result in conflicts with existing zoning for, or cause rezoning of forest land, timberland, or timberland zoned Timberland Production if the projects are in areas zoned as forest land, timberland, or timberland zoned Timberland Production. The impact would be potentially significant (PS). (Draft EIR p. 3.3-20)

C. The final plan’s transportation projects footprint could have the potential to conflict with the existing zoning for forest land, timberland, or Timberland Production. The extent of this impact would depend on the final scale and design of proposed projects. Nonetheless, the conversion of forest land and timberland acreage would be potentially significant (PS). (Draft EIR, pp. 3.3-20 to 3.3-21)

D. Implementation of Mitigation Measure AGF-2 would reduce the potentially significant impact of conversion of forest or timberland to other uses because it would require avoidance or compensation for converted lands. (Draft EIR, p. 3.3-21)

IMPACT

AGF-3 Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use (Draft EIR, p. 3.3-22)

Mitigation Measures

AGF-3 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- Implement Mitigation Measures AGF-1 and AGF-2.

- Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.
- Design project features to minimize fragmenting or isolating agricultural land. Where a project involves acquiring land or easements, ensure that the remaining agricultural land is of a size sufficient to allow economically viable farming operations. The project sponsors shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.

Significance After Mitigation

Implementation of Mitigation Measure AGF-3 would reduce the potentially significant impact of conversion Farmland or forestland to other uses because it would require avoidance or compensation for converted lands. Projects taking advantage of CEQA Streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, for the reasons described above, the mitigation measures may not be feasible or may not adequately reduce the impact to a less-than-significant level. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (CEQA Guidelines, Section 15091(a)(1).) (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. A range of local conservation plans, habitat conservation agencies and State/federal park designated areas provide protection for a substantial amount of forest land and Farmland. The majority of projected development under the proposed plan would occur on existing urban land, thereby minimizing impacts and potential further fragmentation of Farmland, forest land or timberland. As noted above, some Bay Area cities have urban growth boundaries to limit sprawl and protect forest land and agricultural land and timberland. However, a substantial amount of land on the urban and suburban fringe is vulnerable to development, if not within the boundaries of protected lands, and face additional development

pressure as adjacent lands are converted from undeveloped to developed uses. Therefore, development projects anticipated to occur under the proposed plan could have the potential to cause other changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. This impact would be potentially significant (PS). (Draft EIR, p. 3.3-22)

C. Implementation of Mitigation Measure AGF-3 would reduce the potentially significant impact of conversion Farmland or forestland to other uses because it would require avoidance or compensation for converted lands. (Draft EIR p. 3.3-23)

2.4.3 Air Quality (3.4)

IMPACT

AQ-2 Result in a substantial net increase in construction-related emissions (Draft EIR, p. 3.4-41)

Mitigation Measures

AQ-2 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable to reduce impacts to a less-than-significant level based on project- and site-specific considerations, that include those identified below:

When applicable screening levels set by the relevant air district are exceeded, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable to reduce impacts to a less-than-significant level based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

Construction Best Practices for Exhaust

The applicant or general contractor for the project shall submit a list of all off-road equipment greater than 25 horsepower (hp) that would be operated for more than 20 hours over the entire duration of project construction, including equipment from subcontractors, to the relevant air district (e.g., the Bay Area Air District, NSCAPCD, or YSAQMD) for review and certification. The list shall include all information necessary to ensure the equipment meets the following requirements:

- Equipment shall be zero emission or have engines that meet or exceed either EPA or CARB Tier 4 off-road emission standards, and it shall have engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS), if one is available for the equipment being used. Equipment with engines that meet Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement; therefore, a VDECS would not be required.
- Idling time of diesel-powered construction equipment and trucks shall be limited to no more than 2 minutes. Clear signage of this idling restriction shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with the manufacturers' specifications.
- Portable diesel generators shall be prohibited. Grid power electricity should be used to provide power at construction sites, or propane and natural gas generators may be used when grid power electricity is not feasible.
- Current certificate(s) of compliance with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, Sections 2449 and 2449.1) shall be provided.

Construction Best Practices for Entrained Dust

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. For projects over 5 acres in size, soil moisture should be maintained at a minimum of 12%. Moisture content can be verified by lab samples or a moisture probe.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. Dry power sweeping should only be performed in conjunction with thorough watering of the subject roads.
- All vehicle speeds on unpaved roads and surfaces shall be limited to 15 miles per hour (mph).
- All roadway, driveway, and sidewalk paving shall be completed as soon as possible. Building pads shall be paved as soon as possible after grading.
- All construction sites shall provide a posted sign visible to the public with the telephone number and person to contact at the lead agency regarding dust complaints. The recommended response time for corrective action shall be within 48 hours. The Bay Area Air District's Complaint Line (1.800.334.6367) shall also be included on posted signs to ensure compliance with applicable regulations.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50% air porosity.
- Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
- The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
- All trucks and equipment, including their tires, shall be washed off before leaving the site.
- Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.
- Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1%.
- Hydroseed or apply nontoxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.
- Minimize the amount of excavated material or waste materials stored at the site.
- Applicable mitigation measures shall be required at the time grading permits are issued.

Significance After Mitigation

The measures described above would minimize emissions of criteria air pollutants (e.g., PM_{10} and $PM_{2.5}$) and precursors (e.g., ROG and NOx) by requiring best practices for dust and exhaust emissions through the use of readily available, lower-emitting diesel equipment, and/or equipment powered by alternative cleaner fuels (e.g., propane) or electricity, as well as on-road trucks using particulate exhaust filters. To the extent that an implementing agency requires an individual project to implement all feasible mitigation measures described above, a project's impact would be less than significant with mitigation (LTS-M).

Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific

conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. As individual projects under the land use growth footprint, sea level rise adaptation projects, and planned transportation projects are constructed, construction activity would result in emissions of criteria air pollutants (e.g., PM2.5 and PM10) and precursors (e.g., ROG and NOX) from site preparation (e.g., excavation, grading, and clearing); exhaust from off-road equipment, material delivery vehicles, and worker commute vehicles; vehicle travel on paved and unpaved roads; and other miscellaneous activities (e.g., building construction, asphalt paving, application of architectural coatings, and trenching for utility installation). Although EPA and CARB have adopted stringent diesel PM emission regulations for construction equipment, these regulations alone cannot assure that all projects consistent with the proposed plan would use only the lowest emissions-generating construction equipment. Additionally, dust emissions from construction activity would occur from the disturbance of sites and material handling. Construction could also occur at any point under the plan build-out period and could potentially occur over a short period of time, resulting in substantial construction-related emissions on a daily basis. This impact would be potentially significant (PS). (Draft EIR, pp. 3.4-42 to 3.4-43)

B. Mitigation Measure AQ-2 would minimize emissions of criteria air pollutants (e.g., PM10 and PM2.5) and precursors (e.g., ROG and NOx) by requiring best practices for dust and exhaust emissions through the use of readily available, lower-emitting diesel equipment, and/or equipment powered by alternative cleaner fuels (e.g., propane) or electricity, as well as on-road trucks using particulate exhaust filters.

Impact

AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or State ambient air quality standard (Draft EIR, p. 3.4-45)

Mitigation Measures

AQ-3(a) MTC and ABAG, in partnership with the local air districts and implementing agencies, shall work together to support the use of existing air quality and transportation funds and seek additional funds to continue to implement the Bay Area Air District, NSCAPCD, YSAQMD, and CARB programs (e.g., Carl Moyer Program) intended to retrofit and replace trucks and locomotives.

AQ-3(b) MTC and ABAG, in partnership with the local air districts and the Port of Oakland, and other agency partners, shall work together to secure incentive funding to reduce mobile PM emissions from mobile exhaust and entrained PM sources, such as tire wear, brake wear, and roadway dust.

AQ-3(c) MTC and ABAG, in partnership with local air districts, and implementing agencies shall:

- support the advancement of corridor-level plans and implementation of projects located on severely congested (LOS F) facilities, and

- incorporate transportation demand management (TDM) strategies into individual land use land transportation projects and plans, as part of the planning process; TDM strategies could include ridesharing, carsharing, telecommuting, adopting flexible working hours, implementing parking management and traffic-calming measures, and marketing TDM options (especially alternative commuting services).

AQ-3(d) When applicable screening levels set by the applicable air district are exceeded for a specific project, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below or are updated by the applicable air district or within CalEEMod:

- use of energy-efficient lighting and process systems (e.g., low-NOX water heaters and boiler units);
- design streets to maximize pedestrian access to transit stops;
- include bus shelters at transit access points where deemed appropriate by local public transit operator in large residential, commercial, and industrial projects;
- equip residential structures with electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment;
- provide for, or contribute to, dedication of land for off-site Class I and Class II bicycle facilities linking the project to designated bicycle commuting routes in accordance with the regional bikeway master plan;
- contribute to the provision of synchronized traffic signals on roadways affected by the project and as deemed necessary by the local public works department;
- provide transit-enhancing infrastructure that includes bus turnouts or bulbs, passenger benches, street lighting, route signs and displays, and shelters as demand and service routes warrant, subject to review and approval by local transportation planning agencies;
- provide pedestrian-enhancing infrastructure that includes sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs and infrastructure, street furniture and artwork, street lighting, pedestrian signalization and signage, and/or access between bus service and major transportation points within the project;
- include neighborhood park(s) or other recreational options, such as trails, within the development to minimize vehicle travel to off-site recreational and/or commercial uses;
- install solar water heaters;
- incorporate mixed uses, where permitted by local development regulations, to achieve a balance of commercial, employment, and housing options on the project site;
- contribute to traffic-flow improvements (e.g., right-of-way, capital improvements) that reduce traffic congestion and do not substantially increase roadway capacity;
- provide preferential parking spaces for carpool and vanpool vehicles, implement parking fees for single-occupancy vehicle commuters, and implement parking cash-out program for employees;
- use clean fuel vehicles in the vehicle fleet;
- require all employment centers to include an adequate number of on-site shower/locker facilities for bicycling and pedestrian commuters (typically one shower and three lockers for every 25 employees per shift);
- construct/contribute to bicycle and pedestrian facility improvements;
- provide ancillary services (e.g., cafeterias, health clubs, automatic tellers, and post offices) within walking distance of proposed development (no further than 1,500 feet) as appropriate and in compliance with local development regulations;

- provide park-and-ride lots as deemed feasible and appropriate by transportation planning agencies;
- employment centers that exceed a designated size, as measured by the number of employees, shall provide on-site child care and after-school facilities or contribute to off-site construction of such facilities within walking distance of employment land uses (for employment centers on or adjacent to industrial land uses, on-site child daycare centers shall be provided only if supported by the findings of a comprehensive HRA performed in consultation with the local air district);
- provide on-site pedestrian facility enhancements, such as walkways, benches, proper lighting, vending machines, and building access that are physically separated from parking lot traffic;
- offer alternative work schedules, where practical, that allow for work hours that are compressed into fewer than 5 days (e.g., 9/80, 4/40, or 3/36 schedules), or allow flextime schedules;
- provide transit amenities (e.g., on-site and off-site bus turnouts, passenger benches, or shelters) where deemed appropriate by local transportation planning agencies;
- contribute to the provision of synchronized traffic signals on roadways affected by the proposed project and as deemed necessary by the local public works department;
- provide video conferencing facilities;
- commit to support programs that include guaranteed ride home, subsidized transit passes, and rideshare matching;
- provide transportation (e.g., shuttles) to major transit stations and multimodal centers;
- require each employer employment center (more than 25 employees) to assign a transportation coordinator for the applicable transportation management association (TMA);
- require all employers to install a permanent display in employee common areas of alternate transit information, as determined by the requirements of the TMA;
- require employers or employment centers (more than 25 employees) to implement a guaranteed ride home program;
- require employers or employment centers (more than 25 employees) to implement an incentive program for riding transit, carpooling, vanpooling, biking, and walking instead of driving a single-occupancy vehicle to work, and design and locate buildings to facilitate transit access;
- install Energy Star (or equivalent) cool roofing systems on all buildings;
- design shuttle and transit exits to adjoining streets to reduce time to reenter traffic from the project site;
- increase wall and attic insulation to 20% above Title 24 requirements (residential and commercial);
- orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial);
- provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways;
- include passive solar cooling and heating features in designs, as well as ceiling and whole house fans;
- include programmable thermostats in the design of heating and cooling systems; and
- use day lighting systems, such as skylights, light shelves, and interior transom windows.
- See also Chapter 3, “Measures to Reduce GHG Emissions,” in CAPCOA’s *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA Handbook) for additional reduction measures (CAPCOA 2024). Although the

CAPCOA Handbook focuses on GHG reduction measures, co-benefits of many measures include criteria pollutant emission reductions. Future project proponents shall use the CAPCOA Handbook to develop measures to reduce emissions to below thresholds if significant impacts are identified.

AQ-3(e): Implementing agencies and/or project sponsors shall implement the following measures, where feasible and as applicable to reduce impacts to a less-than-significant level based on project- and site-specific considerations, to reduce criteria air pollutant emitted by natural gas combustion in buildings:

- Prohibit natural gas infrastructure in new development.
- Use, or design to support, microgrid electric systems to facilitate the resiliency of new developments prohibiting natural gas.
- Equip residential structures containing front and rear yard area with electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment.
- Install ground-source heat pumps, solar, or other alternatively-fueled water heaters instead of natural gas or grid-based electric water heaters.
- Install ground-source heat pump, or other alternative, heating and cooling systems.
- Increase wall and attic insulation to 20% above Title 24 requirements (residential and commercial).
- Orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial).
- Provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways.
- Use passive solar cooling and heating designs, ceiling and whole house fans, and programmable thermostats in the design of heating and cooling systems.

Significance After Mitigation

Mitigation Measures AQ-3(a) through AQ-3(d) would reduce significant impacts from forecasted increases in $PM_{2.5}$ and PM_{10} because they would lead to reductions in vehicle trips and VMT. Further, Mitigation Measure AQ-3(e) would reduce area-source emissions from natural gas combustion and landscaping equipment in new developments. Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, because reductions cannot be estimated, it cannot be concluded with certainty that all significant impacts would be avoided. This impact would remain **significant and unavoidable (SU)** for purposes of this program level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Additionally, changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which avoid or substantially lessen the significant environmental effect as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan is designed to reduce GHG emissions pursuant to SB 375, through designated growth geographies and complementary land use (e.g., H03, E04, E05), transportation (e.g., T03, T04, T05, T08, T09, T10, T11, T12), and environmental strategies (i.e., EN07, EN08, EN09).

B. Statewide, criteria pollutant emissions from area sources are forecast to increase through 2050 . Therefore, it would be anticipated that regional emissions of ROG and PM from area sources would also increase, despite implementation of the plan. This is because as regional population and employment grow, so too would architectural coating applications, paving and roofing, and landscaping activities associated with growth in the built environment to accommodate housing and employment.

C. Despite increases in overall statewide and regional area-source emissions, implementation of the proposed plan would result in a more efficient distribution of emissions per capita due to the denser land use growth footprint proposed as part of the plan. Increasing housing density would result in fewer criteria pollutant emissions per capita, or the criteria pollutant emissions associated either directly or indirectly with a single person.

D. Because of the programmatic nature of the proposed plan, individual projects and associated emissions may be different than what is projected at the plan level and may exceed applicable emissions thresholds set by the Bay Area Air District, NSCAPCD, or YSAQMD, as such thresholds were developed to be applied to project-level emissions. Operational area-source emissions from discretionary development would be evaluated prior to project-level approval to ensure proper CEQA clearance and implementation of applicable reduction controls or mitigation measures.

E. With respect to stationary source emissions, levels can vary greatly depending on the exact operations and processes involved. Stationary sources of pollutants would be required to obtain permits from the local air district to operate in compliance with local air district rules. These sources could include diesel engine or gas turbine generators for emergency power generation; central heating boilers for commercial, industrial, or large residential buildings; process equipment for light industrial uses; kitchen equipment at restaurants and schools; service station equipment; and dry-cleaning equipment. The permit process would ensure that these sources would be equipped with required emission controls. Because of the programmatic nature of the proposed plan, individual projects and potential associated stationary-source emissions may be different than what is projected at the plan level and may exceed applicable emissions thresholds set by the Bay Area Air District, NSCAPCD, or YSAQMD, as such thresholds were developed to be applied to project-level emissions. Operational stationary-source emissions from projected growth would be evaluated prior to project-level approval to ensure proper CEQA clearance and implementation of applicable reduction controls and/or mitigation measures. This impact would be potentially significant (PS). (Draft EIR, pp. 3.4-45 to 3.4-47)

F. The proposed transportation projects would result in a net increase in VMT; however, mobile source emissions of criteria pollutants ROG and NOX (summertime and wintertime) in the region would decrease between 2023 and 2050, the planning horizon for the final plan. The primary reason for these reductions is the increasingly stringent vehicle emissions regulations and statewide EV sales requirements (e.g., Advanced Clean Trucks, portions of Advanced Clean Fleets, and Multi-Pollutant Emissions Standards for Light- and Medium-Duty Vehicles) that are assumed as part of the EMFAC2021 model. PM2.5 emissions would increase 27 percent (1.0 ton per day) and PM10 emissions would increase 34 percent (6.3 tons per day) during the final plan's timeframe compared to existing conditions. Despite the significant reductions in ROG and NOX emissions, this impact would be potentially significant (PS) because there would be a net increase in PM10 and PM2.5 emissions from mobile sources. (Draft EIR, pp. 3.4-48 to 3.4-49)

G. A key source of PM is the combustion of fossil fuels. After these fuels break down during combustion, they cool, become radicalized, and agglomerate. These particles can form highly toxic compounds, and, when inhaled, the particles can enter the respiratory tract, causing chemical imbalances throughout the body, potentially resulting in inflammation, cell death, and organ failure. The health effects from toxic PM emission compounds can contribute to cardiovascular events, such as stroke and heart attack. It would be speculative to correlate exposure to criteria air pollutants from this plan to specific health outcomes for sensitive receptors other than determining the types of health effects that could occur due to

knowledge gaps and the complexity factors contributing to individual health outcomes. (Draft EIR, pp. 3.4-49 to 3.4-50)

H. Mitigation Measures AQ-3(a) through AQ-3(d) would reduce significant impacts from forecasted increases in PM2.5 and PM10 because they would lead to reductions in vehicle trips and VMT, thereby reducing mobile source emissions. Further, Mitigation Measure AQ-3(e) would reduce area-source emissions from natural gas combustion and landscaping equipment in new developments. (Draft EIR, p. 3.4-53)

IMPACT

AQ-4 Expose sensitive receptors to substantial pollutant concentrations (Draft EIR, p. 3.4-53)

Mitigation Measures

AQ-4(a) When locating sensitive receptors in TAC risk areas, as identified in Figure 3.4-1, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- Install, operate and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13 (MERV-16 for projects located in the West Oakland Specific Plan area) or higher (BAAQMD 2016). The HVAC system shall include the following features: installation of a high-efficiency filter and/or carbon filter to filter particulates and other chemical matter from entering the building; either high-efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85% supply filters shall be used.
- Reduce emissions from diesel trucks through implementing the following measures, if feasible:
    - installing electrical hook-ups for diesel trucks at loading docks;
    - requiring trucks to use transportation refrigeration units that meet Tier 4 emission standards;
    - requiring truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels;
    - prohibiting trucks from idling for more than 2 minutes;
    - establishing truck routes to avoid sensitive receptors in the project; and
    - implementing a truck route program, along with truck calming, parking, and delivery restrictions.
- Install passive electrostatic filtering systems with low air velocities (i.e., less than 1 mph).
- Phase residential developments when proposed within 500 feet of freeways such that homes nearest the freeway are built last, if feasible.
- Locate sensitive receptors as far away from truck activity areas, such as loading docks and delivery areas, as feasible.
- Ensure that existing and new standby or emergency diesel generators meet CARB's Tier 4 emission standards, if feasible.
- Locate individual and common exterior open space and outdoor activity areas proposed as part of individual projects as far away as possible from emission source within the project site boundary, face them away major freeways, and shield them from the source (i.e., the roadway) of air pollution with buildings or otherwise buffer them to further reduce air pollution for project occupants.

- Locate air intakes and design windows to reduce PM exposure (e.g., windows nearest to the roadway do not open).
- If sensitive receptors are located near a distribution center, do not locate residents immediately adjacent to a loading dock or where trucks concentrate to deliver goods.
- Locate sensitive receptors in buildings in areas upwind of major roadway traffic to reduce exposure to reduce cancer risk levels and exposure to PM2.5.
- Plant trees and/or vegetation between sensitive receptors and pollution source. Trees that are best suited to trapping PM shall be planted, including one or more of the following species: pine (Pinus nigra var. maritima), cypress (x Cupressocyparis leylandii), hybrid popular (Populus deltoids x trichocarpa), California pepper tree (Schinus molle), and redwood (Sequoia sempervirens).
- Reduce emissions from diesel trucks by establishing truck routes to avoid residential neighborhoods or other land uses serving sensitive populations, such as hospitals, schools, and child care centers. A truck route program, along with truck calming, parking and delivery restrictions, shall be implemented to direct traffic activity at non-permitted sources and large construction projects.

These measures are consistent with recommendations in the Bay Area Air District's CEQA Guidelines (BAAQMD 2023a) and Planning Healthy Places (BAAQMD 2016).

AQ-4(b) MTC and ABAG shall partner with the Bay Area Air District and local lead agencies to develop a program to install air filtration devices in existing residential buildings, and other buildings with sensitive receptors, located near freeways or sources of TACs and $PM_{2.5}$.

AQ-4(c) MTC and ABAG shall partner with the Bay Area Air District to develop a program to provide incentives to replace older locomotives and trucks in the region to reduce TACs and $PM_{2.5}$.

AQ-4(d) The implementing agency shall implement the strategies identified in the CARB Technical Advisory to reduce air pollution exposure near high-volume roadways to less-than-significant levels, where feasible. Examples of effective strategies include (CARB 2017):

- using speed reduction mechanisms, such as roundabouts to reduce the frequency of stop-and-go driving common among streets that support stop signs;
- using traffic signal management to limit the frequency of stop-and-go driving and vehicle idling;
- establishing and enforcing speed limit reductions of high-speed roadways;
- using design elements that promote air flow and pollutant dispersion along street corridors to optimize air flow, building downwash, and pollution dispersal;
- incorporating bike lanes and sidewalks to promote alternative, zero-pollution modes of transportation; and
- constructing solid barriers directly adjacent to high-volume roadways, such as sound walls to improve downwash.

Significance After Mitigation

Implementation of Mitigation Measure AQ-2 would minimize emissions of TACs by requiring best practices for exhaust emissions through the use of readily available, lower-emitting diesel equipment, and/or equipment powered by alternative cleaner fuels (e.g., propane) or electricity, as well as on-road trucks using particulate exhaust filters. Mitigation Measure AQ-4(a) would reduce the amount of TAC emissions that sensitive receptors would be exposed to through actions such as requiring setback distances between receptors and sources of TAC emissions (studies show that diesel PM is highly dispersive and that concentrations of diesel PM decline with distance from the source [e.g., 500 feet from a freeway, the concentration of diesel PM decreases by 70%] [Roorda-Knape et al. 1999; Zhu et al. 2002, cited in CARB

2005:9]), as well as by improving building air filtration systems and routing truck trips away from residential neighborhoods. Mitigation Measure AQ-4(b) would reduce the exposure of existing receptors to substantial concentrations of TAC emissions by facilitating air filtration improvements in existing buildings near TAC sources. Mitigation Measure AQ-4(c) would reduce TAC emissions generated by older locomotives and trucks by facilitating incentives to replace them with newer models that have improved emissions control technologies, or have zero-emissions in the case of electric trains and trucks. Lastly, Mitigation Measure AQ-4(d) would reduce the exposure of sensitive receptors to substantial TAC concentrations by improving transportation efficiency to reduce vehicle exhaust emissions through methods such as improving traffic flow efficiency, promoting alternative transportation methods, such as biking and walking, and implementing physical barriers along high-volume roadways to decrease emissions dispersion. The vehicle speed reduction measures listed under Mitigation Measure AQ-4(d) would result in reduced stop-and-go driving and hard accelerations thereby reducing emissions rates. Although each vehicle reaches its optimal fuel economy at a different speed (or range of speeds), gas mileage usually decreases rapidly at speeds above 50 mph. Aggressive driving (speeding, rapid acceleration and braking) wastes gas and lowers gas mileage by approximately 15–30% at highway speeds and 10–40% in stop-and-go traffic (Oak Ridge National Laboratory 2017).

Site-specific analysis would be needed when a project is proposed in the plan area to determine the actual level of exposure and whether feasible mitigation exists for the project to implement to reduce its level of cancer risk exposure to less than 100 in a million and $PM_{2.5}$ concentrations less than 0.8 $\mu g/m^3$.

The proposed plan could result in changes in total $PM_{2.5}$ exposure levels that disproportionally impact Overburdened Communities. These impacts would vary across counties.

The mitigation measures identified above would result in reduced emissions and lower exposure levels near sensitive receptors. Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, the exact reductions are not known at this time. Therefore, this impact would be **significant and unavoidable (SU).**

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan is designed to reduce GHG emissions pursuant to SB 375, through designated growth geographies and complementary land use (e.g., H03, E04, E05), transportation (e.g., T03, T04, T05, T08, T09, T10, T11, T12), and environmental strategies (i.e., EN07, EN08, EN09).

B. The final plan could locate sensitive receptors in areas where TACs or PM2.5 concentrations result in cancer risk levels greater than 100 in a million or a concentration of PM2.5 greater than 0.8 micro grams (µg) per cubic meter (m3)or where TACs or PM2.5 concentrations are in noncompliance with an adopted CRRP. Therefore, land use impacts would be potentially significant (PS). (Draft EIR, p. 3.4-55)

C. While exhaust-related emissions would decrease in both Overburdened Communities and non-Overburdened Communities, total PM2.5 emissions would increase in the plan area as would total

PM2.5 emissions in multiple Overburdened Communities (see Table 3.4-13 and Table 3.4-14) . The projected increase in total PM2.5 emissions in these Overburdened Communities from 2023 to 2050 would constitute a change in PM2.5 exposure levels that disproportionally affect Overburdened Communities and would exacerbate an existing hazard to Overburdened Communities which are currently exposed to a disproportionately high concentration of air toxics. This would be a potentially significant impact (PS). (Draft EIR, p. 3.4-61)

D. Mitigation Measures AQ-4(a) through AQ-4(d) would result in reduced emissions and lower exposure levels near sensitive receptors by modifying project siting and orientation, establishing truck routes, requiring air filtration systems, and implementing CARB Technical Advisory strategies that would reduce air pollution exposure near high-volume roadways such as strategies to reduce stop-and-go driving, promoting zero-pollution travel modes, and design elements to reduce pollution dispersal. (Draft EIR, p. 3.4-63)

2.4.4 Biological Resources (3.5)

IMPACT

BIO-1(a) Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries (Draft EIR, p. 3.5-36)

Mitigation Measures

BIO-1(a) Implementing agencies and/or project sponsors shall implement measures, where feasible and necessary based on project- and site-specific considerations, that include those identified below:

- Implementing agencies shall require project sponsors to prepare biological resource assessments for specific projects proposed in areas known or likely to contain habitat suitable for special-status plants and wildlife, such as sites that are not surrounded by urban development and/or have not been previously disturbed or developed. The assessment shall be conducted by qualified professionals pursuant to adopted protocols and agency guidelines, where applicable. Where the biological resource assessments establish that mitigation is required to avoid and minimize direct and indirect adverse effects on special-status plant and wildlife species, or compensate for unavoidable effects, mitigation shall be developed consistent with the requirements or standards of CEQA, USFWS, CDFW, and local regulations and guidelines, in addition to requirements of any applicable and adopted HCP/NCCP or other applicable plans developed to protect species or habitat.
- For proposed plan projects subject to CEQA or NEPA, or subject to permitting processes and review by CDFW, USFWS, and NOAA Fisheries, pre-project biological surveys shall be conducted as part of the CEQA/NEPA process to determine the presence and extent of sensitive habitats and species in the project vicinity. Surveys shall follow established methods and shall be conducted at times when the subject species is most likely to be identified. In cases where impacts on State- or federally listed plant or wildlife species are possible, formal protocol-level surveys may be required on a species-by-species basis to determine the local presence and distribution of these species. Coordination with CDFW, USFWS, and NOAA Fisheries, as appropriate, shall be conducted early in the planning process at an informal level for projects that could adversely affect federal or State candidate, proposed, threatened, or endangered species to determine the need for consultation or permitting actions. Projects shall obtain incidental take authorization from the permitting agencies, as required, before project implementation.

- A species and habitat compensation plan shall be prepared and implemented for unavoidable direct impacts on special-status plant species and shall be reviewed and approved by the resource agencies and lead agency prior to project approval. The plan shall identify effective methods for reestablishing the affected species and habitat, including but not limited to seed collection, salvage of root masses, and planting seeds and/or root masses in an area with suitable conditions. The plan shall also specify a monitoring program designed to evaluate success in reestablishing the affected species and habitat, and remedial measures that shall be followed if the project is not meeting specified performance criteria. The monitoring program shall be designed and implemented to evaluate the current and probable future health of the resources, and their ability to sustain populations in keeping with natural populations following the completion of the program. Remedial measures are highly dependent upon the species and habitats in question, but generally shall include but not be limited to invasive species management, predator control, access control, replanting and reseeding of appropriate habitat elements, regarding, and propagation and seed bulking programs.
- Project designs shall be reconfigured, whenever practicable, to avoid special-status species and sensitive habitats. Projects shall minimize ground disturbances and transportation project footprints near sensitive areas to the extent practicable.
- Temporary access roads and staging areas shall not be located within the areas containing sensitive plants or wildlife species wherever feasible, to avoid or minimize impacts on these species.
- Project activities in the vicinity of sensitive resources shall be completed during the period that best avoids disturbance to plant and wildlife species present to the extent feasible.
- Individual projects shall minimize the use of in-water construction methods in areas that support sensitive aquatic species, especially when listed species could be present.
- If equipment needs to operate in any watercourse with flowing or standing water where special-status species may be affected, a qualified biological resource monitor shall be present to alert construction crews to the possible presence of such special-status species.
- If project activities involve pile driving or vibratory hammering in or near water, interim hydroacoustic threshold criteria for protected fish species shall be adopted as set forth by the Interagency Fisheries Hydroacoustic Working Group, as well as other avoidance methods to reduce the adverse effects of construction to sensitive fish, piscivorous birds, and marine mammal species.
- A qualified biologist shall locate and fence off sensitive resources before construction activities begin and, where required, shall inspect areas to ensure that barrier fencing, stakes, and setback buffers are maintained during construction.
- For work sites located adjacent to special-status plant or wildlife populations, a biological resource education program shall be provided for construction crews and contractors (primarily crew and construction foremen) before construction activities begin.
- Biological monitoring shall be considered for areas near identified habitat for State- and federally listed species, and a “no take” approach shall be taken whenever feasible during construction near special-status plant and wildlife species.
- Mitigation Measure NOISE-1 shall be implemented when permanent or temporary noise has been identified as having a potential impact on wildlife.
- Impacts resulting from nighttime lighting associated with construction and future permanent lighting shall be assessed at the project level. This assessment shall include an analysis of current light sources in the vicinity of the project. All feasible measures to reduce impacts from nighttime

lighting shall be considered and implemented at the project level based on site-specific conditions. They may include but shall not be limited to the following measures:

- To the extent feasible, nighttime lighting sources shall not be installed in areas that contain or are likely to contain habitat suitable for special-status species.
- Nighttime lighting shall be directed at the construction or project site and away from sensitive habitats. Light glare shields shall be used to reduce the extent of illumination onto adjoining areas. Permanent lighting shall be shielded and directed at intended use areas.
- LEDs or bulbs installed as part of a project shall be rated to emit or produce light at or under 2700 Kelvin, which results in the output of a warm white color spectrum.
- Physical barriers, including solid concrete barriers or privacy slats in cyclone fencing, shall be installed where they have the potential to reduce illumination from overhead lights and automobile lights. Barriers should only be utilized as a light pollution minimization measure if they do not create a substantial barrier to wildlife movement such that the height and/or width of the barrier do not allow wildfire to move through the area. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway.
- Reflective highway markers shall be used to reduce raptor collisions on roadways.
- Projects on previously unlit roadways with adjacent sensitive habitat and open space shall explore design options that address safety needs without the use of artificial lighting.
- If nighttime lighting has the potential to result in adverse effects on a listed or candidate wildlife species (e.g., a nest, den, or other important habitat feature is identified near the project site), then consultation with the appropriate natural resource agency may be required.

- Fencing and/or walls shall be built to avoid temporary or permanent access of humans or domestic animals from development areas into areas occupied by special-status species. Spoils, trash, or any debris shall be removed offsite to an approved disposal facility.
- Project activities shall comply with existing local regulations and policies, including applicable HCP/NCCPs, that exceed or reasonably replace any of the above measures protective of special-status species.
- Compensatory mitigation for unavoidable loss of habitat or other impacts on special-status species may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning (RAMP) (i.e., Conservation and Mitigation Banking, natural community conservation planning, Regional Conservation Investment Strategies), as deemed appropriate by the permitting agencies. Projects will prioritize mitigation banking within the same county as the project, if possible (i.e., if mitigation banks or mitigation credits are available in a given county).

Significance After Mitigation

To the extent that a local agency requires an individual project to implement the feasible mitigation measure described above, as applicable, the impact would be less than significant with mitigation (LTS-M) because these mitigation measures would require pre-project surveys and biological monitoring, avoidance or minimization of project-related disturbance or loss of special-status species, and coordination with permitting agencies as required prior to project implementation.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt

mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Implementation of the land use development pattern under the final plan could result in regional impacts on special-status species. Potential regional effects on special-status species could occur as a result of habitat fragmentation, increased human intrusion into wildland areas, introduction of invasive species, disruption of migratory corridors, and a resulting regional reduction in biological diversity. Potential localized effects on special-status species include the temporary and permanent removal or conversion of vegetation and habitat necessary for species breeding, feeding, dispersal, or sheltering. Construction of projects and ongoing operations could result in direct mortality of special-status plants and wildlife, entrapment of wildlife in open trenches, and general disturbance because of noise or vibration during pile driving, earthmoving, and other construction activities for species present in disturbance areas. Construction-generated fugitive dust accumulation on surrounding vegetation and construction-related erosion, runoff, and sedimentation could degrade the quality of adjacent vegetation communities, affecting their ability to support special-status plants and wildlife. Habitat fragmentation and disruption of migratory corridors could also occur on a local level, potentially affecting local populations by making them more vulnerable to extirpation. Because the proposed plan's forecasted development pattern could result in the disturbance or loss of special-status plant and wildlife species and habitats, this impact would be potentially significant (PS). (Draft EIR, p. 3.5-37)Potential effects of sea level rise adaptation projects on special-status plant and wildlife species are generally like those described above for the land use growth footprint under the proposed plan. In this case, most potential impacts on special-status species would occur in association with adaptation projects that would result in earthmoving or vegetation removal activities (e.g., elevated roadways and rail infrastructure, levees, sea walls, tidal gates) that are currently within or adjacent to occupied habitat or habitat suitable for special-status species. While marsh land restoration projects would likely benefit special-status species that occur in marsh habitats, overall, these projects could result in temporary adverse effects on these resources. Because the implementation of sea level rise adaptation projects may result in construction that results in the disturbance or loss of special-status plant and wildlife species and habitats, this impact would be potentially significant (PS). (Draft EIR, p. 3.5-37)

C. Transportation projects - particularly new rail projects located in areas that have not been subject to previous ground disturbance - could contribute to regional and local habitat loss and fragmentation. Due

to the potential for habitat loss and fragmentation noted above, construction impacts would be potentially significant (PS). (Draft EIR, pp. 3.5-37 to 3.5-38)

D. Long-term increases in the volume of vehicular traffic and major expansions of existing roads or development of new roads in rural areas are expected to result in increased automobile-related wildlife mortalities and injuries of common and special-status wildlife species. This effect would be most pronounced in rural areas, where roads traverse larger expanses of natural habitats. Because the proposed plan transportation projects may result in the disturbance or loss of special-status plant and wildlife species and habitats, this impact would be potentially significant (PS). (Draft EIR, p. 3.5-38)

E. Mitigation Measure BIO-1(a) would reduce direct and indirect impacts to candidate, sensitive, or special status species because it would require pre-project surveys and biological monitoring, avoidance or minimization of project-related disturbance or loss of special-status species, and coordination with permitting agencies as required prior to project implementation. (Draft EIR, p. 3.5-40)

IMPACT

BIO-1(b) Have substantial adverse impacts on designated critical habitat for federally listed plant and wildlife species (Draft EIR, p. 3.5-41)

Mitigation Measures

BIO-1(b) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, for projects that could affect designated critical habitat for federally listed plant and wildlife species that include those identified below (or other equally effective measures):

- Coordination with USFWS and NOAA Fisheries, as appropriate based on the species, shall be conducted early in the environmental review process to determine the need for further mitigation, consultation, or permitting actions. Formal consultation is required for any project with a federal nexus when a listed species or designated critical habitat is likely to be adversely affected. Any conservation measures required by USFWS or NOAA Fisheries as part of formal consultation (e.g., through issuance of a biological opinion) would be implemented.
- Reconfigure project design to avoid or minimize adverse effects on protected species within designated critical habitats.
- Implementing agencies and/or project sponsors shall comply with existing local regulations and policies, including applicable HCP/NCCPs.
- Additionally, implementation of Mitigation Measure BIO-1(a), above, includes an initial biological resource assessment and, if necessary, compensatory mitigation for unavoidable loss of habitat or other impacts on special-status species. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through RAMP, as deemed appropriate by the permitting agencies.

Significance After Mitigation

To the extent that a local agency requires an individual project to implement all feasible and applicable mitigation measures described above, the impact would be less than significant with mitigation (LTS-M). These mitigation measures would require coordination or consultation with USFWS and NOAA Fisheries, as appropriate based on the species, for projects that could adversely affect critical habitat; avoidance or minimization of adverse effects on protected species within critical habitats; and compliance with applicable regulations and policies that protect critical habitat. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions.

As noted above in the Regulatory Setting, pursuant to the requirements of the ESA, an agency reviewing a proposed project within its jurisdiction must determine whether any federally listed or proposed species may be present in the project region and whether the proposed project would result in a "take" of such species. In addition, the agency is required to determine whether the project is likely to jeopardize the continued existence of any species proposed to be listed under the ESA, or result in the destruction or adverse modification of critical habitat proposed to be designated for such species. The "take" prohibition of the ESA applies to any action that would adversely affect a single member of an endangered or threatened species. "Take," as defined in Section 9 of the ESA, is broadly defined to include intentional or accidental "harassment" or "harm" to wildlife. "Harm" is defined as an act that actually kills or injures wildlife. It may include significant habitat modification or degradation where it actually kills or injures wildlife by significantly impairing essential behavioral patterns, including breeding, feeding, or sheltering.[4] Further, because Mitigation Measure BIO-1(b) is tied to existing regulations that are law and binding on responsible agencies and project sponsors, it is reasonable to determine that they would be implemented. Therefore, with the incorporation of Mitigation Measure BIO-1(b), this impact would be **less than significant with mitigation (LTS-M)**.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts.

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Land use development under the final plan could result in temporary or permanent loss of critical habitat. Degradation of areas that have high conservation value for these species could also occur in association with final plan development, where such development occurs within or adjacent to critical habitat, through the introduction of night lighting, increases in ambient noise levels, and the introduction of invasive species and predators. Plan development could also result in the introduction of, or increases in, additional vehicular or recreational pressures in areas designated as critical habitat. Although direct effects on salmonid critical habitat are not expected, disturbances outside critical habitat could generate erosion, sedimentation, or other water quality impacts on salmonid critical habitat downstream. Because the final plan's forecasted development pattern may result in the loss or degradation of designated critical habitat for federally listed plant and wildlife species, this impact would be potentially significant (PS). (Draft EIR, p. 3.5-42)

[4] There is currently a proposed rule (Federal Register Vol. 90 No. 73, USFWS 2025) to rescind the definition of "harm" from ESA's "take" definition; however, a final rule has not been published.

C. Potential effects of sea level rise adaptation projects on designated critical habitat are generally similar to those described above for land use development under the proposed plan. In this case, most impacts on critical habitat would occur in association with sea level rise adaptation projects that would result in earthmoving activities (e.g., elevated highway/roadway, levees, sea walls, tidal gates) in locations that are currently on the boundary of, or that traverse, critical habitat. Because the proposed sea level rise adaptation projects may result in permanent or temporary disturbance or loss of designated critical habitat for federally listed plant and wildlife species, this impact would be potentially significant (PS). (Draft EIR, p. 3.5-43)

D. Potential effects of transportation projects on designated critical habitat are generally similar to those described above for land use development under the proposed plan. In this case, most impacts on critical habitat would occur in association with widening (or otherwise expanding) roads that are currently on the boundary of, or that traverse, critical habitat, as well as constructing new rail projects within the boundaries of, or that traverse, critical habitat. Because the proposed transportation projects may result in permanent or temporary disturbance or loss of designated critical habitat for federally listed plant and wildlife species, this impact would be potentially significant (PS). (Draft EIR, p. 3.5-44)

E. Mitigation Measure BIO-1(b) would reduce significant impacts because it would require coordination or consultation with USFWS and NOAA Fisheries, as appropriate based on the species, for projects that could adversely affect critical habitat; avoidance or minimization of adverse effects on protected species within critical habitats; and compliance with applicable regulations and policies that protect critical habitat. (Draft EIR, p. 3.5-45)

IMPACT

BIO-2 Have a substantial adverse effect on riparian habitat, State- or federally protected wetlands (including but not limited to marsh, vernal pool, coastal), or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS, through direct removal, filling, hydrological interruption, or other means (Draft EIR, p. 3.5-45)

Mitigation Measures

BIO-2 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Implementing agencies shall require project sponsors to prepare biological resource assessments for specific projects proposed in areas containing, or likely to contain, jurisdictional waters or other sensitive or special-status communities. These assessments shall be conducted by qualified professionals in accordance with agency guidelines and standards. Qualified professionals shall reference applicable regional data sources for wetland mapping, which may include, but not be limited to, the Adaptation Atlas (San Francisco Estuary Institute 2021), Recovery Plan for Tidal Marsh Ecosystems of Northern and Central California (USFWS 2013), and the 2015 Bay Ecosystem Habitat Goals Update (Goals Project 2015). Where the biological resource assessments establish that mitigation is required to avoid and minimize direct and indirect adverse effects on State- or federally protected wetlands, or compensate for unavoidable effects, mitigation shall be developed consistent with the requirements or standards of USACE, EPA, RWQCB, and CDFW, and local regulations and guidelines, in addition to requirements of any applicable and adopted HCP/NCCP or other applicable plans developed to protect these resources. In keeping with the "no net loss" policy for jurisdictional waters (i.e., wetlands and other waters of the United States or State), project designs shall be configured, whenever possible, to avoid wetlands and other waters and avoid disturbances to wetlands and riparian corridors to preserve both the habitat and the overall

ecological functions of these areas. Projects shall minimize ground disturbances and transportation project footprints near such areas to the extent practicable.

  - Project sponsors shall consult with USFWS, NMFS, USFS, CDFW where State-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the ESA, the MBTA during the breeding season, CESA, or fully protected species afforded protection pursuant to the State Fish and Game Code and with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds.

- Where avoidance of jurisdictional waters is not feasible, project sponsors shall minimize fill and the use of in-water construction methods, and place fill only with express permit approval from the appropriate resource agencies (e.g., USACE, RWQCB, CDFW, BCDC, CCC) and in accordance with applicable existing regulations, such as the Clean Water Act or local stream protection ordinances.
- Where avoidance of jurisdictional waters is not feasible, project sponsors shall arrange for compensatory mitigation in the form of mitigation bank credits; on-site or off-site enhancement of existing waters; or wetland creation in accordance with applicable existing regulations and subject to approval by USACE, RWQCB, CDFW, BCDC, and/or CCC. If compensatory mitigation is required, the project sponsor shall develop a restoration and monitoring plan that describes how compensatory mitigation will be achieved, implemented, maintained, and monitored. At a minimum, the restoration and monitoring plan shall include clear goals and objectives, success criteria, specifics on restoration/creation/enhancement (e.g., plant palette, soils, irrigation design standards and requirements), specific monitoring periods and reporting guidelines, and a maintenance plan. The following minimum performance standards (or other standards as required by the permitting agencies) shall apply to any wetland compensatory mitigation:
  - Compensation shall be provided at a minimum 1:1 ratio for restoration, preservation, and creation but shall in all cases be consistent with mitigation ratios set forth in locally applicable plans (e.g., general plans, HCP/NCCPs) or in project-specific permitting documentation. Compensatory mitigation may be a combination of on-site restoration/creation/enhancement or off-site restoration, preservation, or enhancement. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through RAMP, as deemed appropriate by the permitting agencies.
  - In general, any compensatory mitigation shall be monitored for a minimum of 5 years and will be considered successful when at least 75% cover (or other percent cover considered appropriate for the vegetation type) of installed vegetation has become successfully established.
  - If the restoration is not meeting success criteria, remedial measures shall be implemented and can include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods. After final success criteria have been met and relevant permitting agencies have approved the mitigation project as complete, all mitigation areas shall be permanently conserved (e.g., conservation easement) and managed in perpetuity.
- Salvage and stockpile topsoil (i.e., the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes shall be avoided as identified by the qualified wetland biologist.
- In accordance with CDFW guidelines and other instruments protective of sensitive or special- status natural communities, project sponsors shall avoid and minimize impacts on sensitive natural

communities and habitats when designing and permitting projects. Where applicable, projects shall conform to the provisions of special area management or restoration plans, such as the Suisun Marsh Protection Plan and the East Contra Costa County HCP, which outline specific measures to protect sensitive vegetation communities. Where applicable, project sponsors shall consult standards established in the Regional Shoreline Adaptation Plan guidelines to avoid impacts on shoreline habitats.

- If any portion of a sensitive natural community is permanently removed or temporarily disturbed, the project sponsor shall provide compensatory mitigation for the loss. If such mitigation is required by the implementing agency, the project sponsor shall develop a restoration and monitoring plan that describes how compensatory mitigation will be achieved, implemented, maintained, and monitored. At a minimum, the restoration and monitoring plan shall include clear goals and objectives, success criteria, specifics on restoration/creation/enhancement (e.g., plant palette, soils, irrigation design standards and requirements), specific monitoring periods and reporting guidelines, and a maintenance plan. The following minimum performance standards (or other standards as required by the permitting agencies) shall apply to any compensatory mitigation for sensitive natural communities:
    - Compensation shall be provided at a minimum 1:1 ratio for restoration and preservation but shall in all cases be consistent with mitigation ratios set forth in locally applicable plans (e.g., general plans, HCP/NCCPs) or in project-specific permitting documentation. Compensatory mitigation may be a combination of on-site restoration/creation/enhancement or off-site restoration, preservation, or enhancement. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through RAMP, as deemed appropriate by the permitting agencies.
    - In general, any compensatory mitigation shall be monitored for a minimum of 5 years and will be considered successful when at least 75% cover (or other percent cover considered appropriate for the vegetation type) of installed vegetation has become successfully established.
    - If the restoration is not meeting success criteria, remedial measures shall be implemented and may include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods. After final success criteria have been met and relevant permitting agencies have approved the mitigation project as complete, all mitigation areas shall be permanently conserved (e.g., conservation easement) and managed in perpetuity.
- All construction materials, staging, storage, dispensing, fueling, and maintenance activities shall be located in upland areas outside of sensitive habitat, and adequate measures shall be taken to prevent any potential runoff from entering jurisdictional waters. Fueling of equipment shall take place within existing paved roads. Contractor equipment shall be checked for leaks prior to operation and repaired, as necessary.
- Construction activities shall be scheduled, to the extent feasible, to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased.
- Compliance with existing local regulations and policies, including applicable HCP/NCCPs, that exceed or reasonably replace any of the above measures protective of wetlands and other waters or sensitive natural communities.

Significance After Mitigation

To the extent that a local agency requires an individual project to implement the feasible mitigation measure described above, as applicable, the impact would be less than significant with mitigation (LTS-M). These measures would require that sensitive habitat (e.g., jurisdictional waters, sensitive natural communities) be avoided to the extent feasible and that sensitive habitats that cannot be avoided are restored following construction, or if the habitat cannot be restored, that the project proponent compensates for unavoidable losses in a manner that results in no net loss of sensitive habitats and meets applicable regulatory requirements.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. Similar to Impact BIO-1(b), because Mitigation Measure BIO-2 is tied to existing regulations that are law and binding on responsible agencies and project sponsors, it is reasonable to determine that they would be implemented. Therefore, with the incorporation of Mitigation Measure BIO-2, this impact would be **less than significant with mitigation (LTS-M)**.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts.

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Potential impacts of the forecasted development pattern under the final plan on wetlands include the temporary disturbance, or permanent loss, of jurisdictional waters, including wetlands; loss or degradation of stream or wetland function; incremental degradation of wetland habitats; and fragmentation of streams and wetlands. Jurisdictional waters in the region vary from relatively small, isolated roadside areas, wet meadows, and vernal pools to major streams and rivers, bays and estuaries, and tidal, brackish, and freshwater marshes. Any fill of jurisdictional waters associated with proposed land development would be a significant impact. In addition to direct habitat loss, implementation of the forecasted development pattern under the final plan could increase the potential for stormwater runoff to carry a variety of pollutants into wetlands, rivers, streams, and San Francisco Bay through increases in the extent of impervious surfaces.

C. Adverse effects on State- and federally protected wetlands would be addressed, if feasible, through avoidance of these resources. Where avoidance is not possible, and in accordance with USACE, EPA, USFWS, RWQCB, and CDFW guidelines, a standard of "no net loss" of wetland acreage and value is required. Mitigation to compensate for project-related loss of wetland acreage and functions would be based on project-specific wetland mitigation plans, subject to approval by USACE, RWQCB, CDFW,

BCDC, and the California Coastal Commission where applicable. Impacts on jurisdictional waters would be potentially significant (PS). (Draft EIR, pp. 3.5-46 to 3.5-47)

D. Potential effects of sea level rise adaptation projects on wetlands and other waters are generally similar to those described above for land use development under the proposed plan. In this case, most impacts on wetlands and other waters would occur in association with sea level rise adaptation projects that would result in earthmoving activities (e.g., elevated roadways and rail infrastructure, levees, sea walls, tidal gates) in areas that contain or are adjacent to wetlands or other waters. While marshland restoration projects would likely result in an overall beneficial impact on wetlands and other waters, these projects could also result in temporary adverse effects on these resources. Additionally, if sea walls or levees are sited in areas containing or adjacent to wetland habitat (e.g., estuarine and marine wetlands [or, tidal wetlands]), indirect effects on these resources may occur, including disruption of the existing hydrology of these habitats. Adverse effects on State- and federally protected wetlands would be addressed, if feasible, through avoidance of these resources. Where avoidance is not possible, and in accordance with USACE, EPA, USFWS, RWQCB, and CDFW guidelines, a standard of "no net loss" of wetland acreage and value is required. Mitigation for wetland impacts would be based on project-specific wetland mitigation plans, subject to approval by USACE, RWQCB, CDFW, BCDC, and CCC where applicable. Impacts on jurisdictional waters would be potentially significant (PS). (Draft EIR, p. 3.5-47)

E. Potential effects of transportation projects are similar to those discussed above projected growth. Where feasible, State- and federally protected wetlands would be avoided. Where avoidance is not possible, and in accordance with USACE, EPA, USFWS, RWQCB, and CDFW guidelines, a standard of "no net loss" of wetland acreage and value is required. Mitigation for wetland impacts would be based on project-specific wetland mitigation plans, subject to approval by USACE, RWQCB, CDFW, and potentially CCC and BCDC. Impacts on jurisdictional waters resulting from implementation of transportation projects would be potentially significant (PS). (Draft EIR, p 3.5-48)

F. Mitigation Measure BIO-2 would reduce significant direct and indirect impacts because it would require that sensitive habitat (e.g., jurisdictional waters, sensitive natural communities) be avoided to the extent feasible and that sensitive habitats that cannot be avoided are restored following construction, or if the habitat cannot be restored, that the project proponent compensates for unavoidable losses in a manner that results in no net loss of sensitive habitats and meets applicable regulatory requirements. (Draft EIR, p. 3.5-51)

IMPACT

BIO-3 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites (Draft EIR, p. 3.5-51)

Mitigation Measures

BIO-3(a) Implementing agencies shall require project sponsors to prepare detailed analyses for specific projects affecting mapped critical linkages to determine the wildlife species that may use these areas and the habitats those species require. Projects that would not affect mapped critical linkages but that are located within or adjacent to open space lands, including wildlands and agricultural lands, or otherwise may contain land used as wildlife movement corridors (e.g., green belts in urban areas) shall also assess whether significant wildlife corridors are present, what wildlife species may use them, and what habitat those species require. The assessment shall be conducted by qualified professionals and according to applicable agency standards with consideration of the local, regional, and global context of landscape connectivity for a given project in a given area.

Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Design projects to minimize impacts on wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors.
- Design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches.
- Consult relevant guidance documents regarding wildlife movement and habitat connectivity during the project design phase, including but not limited to statewide and Bay Area region guides (e.g., CLN mapping, CDFW's California Wildlife Barriers 2020 [CDFW 2020], the California Department of Transportation's Wildlife Crossings Guidance Manual [Meese et al. 2007], Critical Linkages: Bay Area & Beyond [Penrod et al. 2013]), and local guides (e.g., Gray et al. 2018; Diamond and Snyder 2016).
- Conduct wildlife movement studies for projects that may fragment or constrict regional or local corridors and impede use to nursery sites. These studies will include, but would not be limited to, the following objectives: identify activity levels and directional wildlife movement trends within the study area, consult the California Fish Passage Assessment Database (CALFISH database) to identify potential fish barrier locations and conduct first pass and second pass fish assessments as necessary, assess current functionality of existing underpasses, and determine what species or groups of species exhibit sensitivity to the existing roadways. Movement studies shall identify project-specific measures to avoid or mitigate impacts on corridors and movement to nursery sites that may include, but are not limited to, developing alternative project designs that allow wider movement corridors to remain; provide for buffer zones adjacent to corridors, such as passive recreation zones; implement physical barriers that prevent human and/or domestic predator entry into the corridor or block noise and lighting from development; incorporate shielded and directed lighting in areas near corridors; implement a "natives only" landscaping policy within 200 feet of identified wildlife corridors; incorporate periodic larger habitat patches along a corridor's length; minimize the number of road crossings of identified wildlife corridors; and replace roadway culverts with bridges to allow for wildlife movement.
- For projects that cannot avoid significant impacts on wildlife movement corridors or native wildlife nursery areas, consult with CDFW to determine appropriate measures to minimize direct and indirect impacts and implement measures to mitigate impacts on wildlife corridors or native wildlife nursery sites.
- Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Preservation or improvements of habitat on both sides of a wildlife crossing shall be prioritized.
- Analyze habitat linkages and wildlife movement corridors on a broad scale for long linear projects with the possibility of adversely affecting wildlife movement to avoid critical narrow choke points that could reduce function of recognized movement corridor.
- Construct wildlife-friendly overpasses and culverts. These structures shall be designed to meet the needs of appropriate species, considering factors such as the size or diameter of the structure (e.g., large enough to allow a target species to pass through/over or to allow sufficient stream flow), interval frequency, and/or physical design to allow conditions similar to the surrounding habitat (e.g., open-bottom culverts that provide natural substrate on the stream bottom).
- Upgrade existing culverts or implement directional fencing to guide animals to existing culverts or underpasses when conducting expansion or enhancement projects on existing roads.
- Fence major transportation corridors in the vicinity of identified wildlife corridors.

- Use wildlife-friendly fences that allow larger wildlife, such as deer, to jump over (i.e., no greater than 4 to 5 feet tall on average) and smaller wildlife to move under (by leaving a gap under the fence).
- For projects that require the placement of stream culverts in a fish spawning stream, follow USACE, NOAA Fisheries, USFWS, and CDFW permit conditions and design requirements to allow fish passage through the culverts.
- Limit wildland conversions in identified wildlife corridors such that the function of the wildlife corridor is not impaired.
- Retain wildlife-friendly vegetation in and around developments (e.g., native plant species; vegetation that provides sufficient cover, nesting, or foraging opportunities; mature trees; riparian vegetation).
- Monitor and maintain fencing, under crossings, and/or other crossing structures as needed to ensure corridor permeability and functionality. Development and implementation of a fencing and wildlife crossing structure maintenance plan is recommended to maintain permeability for wildlife across corridors.
- Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 Section 460 of the CCR (protecting fur-bearing mammals), during the breeding season.
- Comply with existing local regulations and policies, including applicable HCP/NCCPs, that exceed or reasonably replace any of the above measures to protect wildlife corridors.

Mitigation Measure BIO-3(b) Implementing agencies and/or project sponsors shall implement the following measures, where feasible and as applicable based on project- and site-specific considerations:

- Implement Mitigation Measures BIO-1(a) and BIO-2.

Significance After Mitigation

To the extent that a local agency requires an individual project to implement all feasible and applicable mitigation measures described above, the impact would be less than significant with mitigation (LTS-M). These mitigation measures would require assessing whether significant wildlife corridors are present in project areas, minimizing wildland conversions in identified wildlife corridors, implementing wildlife-friendly design features, and complying with regulations and policies to protect wildlife corridors and wildlife nursery sites.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Unlike Mitigation Measures BIO-1(b) and BIO-2, the above mitigation measure is not directly tied to existing regulations that are law and binding on responsible agencies and project sponsors. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. The final plan's land use growth footprint overlaps with approximately 450 acres of important baylands, 20 acres of large landscape blocks, 40,550 meters of key riparian corridors, 180 acres of linkage designs, and 7,640 acres of riparian buffer zones (Table 3.5-10). However, the land use growth footprint is concentrated primarily in or adjacent to already urban and built-up areas and along existing transit corridors where migratory corridors for wildlife have already been fragmented and degraded to the point that their function as linkages is either limited or lost entirely. On a local level, waterways, riparian corridors, and contiguous or semicontiguous expanses of habitat are likely to facilitate wildlife movement, even through urbanized areas in the region. In some cases, land use development projects may directly encroach on wildlife corridors, particularly when direct habitat removal occurs or when sites are located adjacent to open space or streams. Degradation of areas that have high value as wildlife movement corridors could also occur in association with proposed plan development, where such development occurs adjacent to these corridors, through increases in ambient noise levels and fire frequency, as well as the introduction of lighting, domestic pets, pollution, and invasive species. Land use growth could also encroach on nursery sites, which are locations where fish or wildlife concentrate for hatching and/or raising young, such as nesting rookeries for birds (e.g., herons, egrets), spawning areas for native fish, fawning areas for mule deer (Odocoileus hemionus), and maternal roosts for bats. The locations of nursery sites in the State are generally not mapped. While most of these sites would likely occur in undeveloped natural areas and the land use growth footprint is located primarily in or adjacent to already urbanized areas, development projects may result in loss or abandonment of wildlife nursery sites.

C. Construction of land use development projects could result in temporary impediment of wildlife movement corridors due to use of heavy equipment, ground disturbance, or staging and direct removal of wildlife nurseries. Ongoing operations of these projects could result in substantial permanent encroachment on local wildlife corridors or permanent loss or ongoing disturbance (e.g., from light or noise) of wildlife nursery sites; therefore, this would be a potentially significant (PS) impact. (Draft EIR, pp. 3.5-51 to 3.5-52)

D. The final plan's sea level rise adaptation projects footprint overlaps with approximately 19,600 acres of important baylands, 990 acres of large landscape blocks, 298,300 feet of key riparian corridors, 2,800 acres of linkage designs, and 32,800 acres of riparian buffer zones (Table 3.5-11). Construction of sea level rise adaptation projects may result in temporary impediment of wildlife corridors, and in some cases, sea level rise adaptation projects may directly encroach on wildlife corridors, particularly when direct habitat removal occurs or when sites are located adjacent to open space or streams. Implementation of sea level rise adaptation projects also may result in loss or abandonment of wildlife nursery sites. Substantial encroachment on local wildlife corridors or loss of wildlife nursery sites would be a potentially significant (PS) impact. (Draft EIR, p. 3.5-52)

E. The final plan's transportation projects footprint overlaps with approximately 250 acres of important Baylands, 10 acres of large landscape blocks, 12,300 feet of key riparian corridors, 180 acres of linkage designs, and 2,500 acres of riparian buffer zones (Table 3.5-12). Many of these transportation projects are expansions or enhancements of existing highways or other transportation routes with existing urban corridors established along them. In these areas, migratory corridors have already been fragmented and degraded to the point that their function as linkages is either limited or has been lost entirely. However,

some transportation projects, particularly new rail projects, could be located in areas that have not been subject to previous disturbance and fragmentation. As discussed for projected land development within land use growth footprint, construction activities associated with proposed transportation projects may result in temporary impediments to wildlife corridors, and operation of these projects may directly encroach on local wildlife corridors, particularly when direct habitat removal occurs or when sites are located adjacent to open space or streams. Additionally, as described above, transportation projects may result in loss or abandonment of wildlife nursery sites. Substantial encroachment on local wildlife corridors or loss of wildlife nursery sites would be a potentially significant (PS) impact. (Draft EIR, pp. 3.5-53 to 3.5-54)

F. Mitigation Measures BIO-3(a) and BIO-3(B) would reduce significant direct and indirect effects because they would require assessing whether wildlife corridors are present in project areas, minimizing wildland conversions in identified wildlife corridors, implementing wildlife-friendly design features, and complying with regulations and policies to protect wildlife corridors and wildlife nursery sites. (Draft EIR, p. 3.5-56)

IMPACT

BIO-5 Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species (Draft EIR, p. 3.5-58)

Mitigation Measures

BIO-5 Implementing agencies and/or project sponsors shall implement the following measures (or other equally effective measures), where feasible and as applicable based on project- and site-specific considerations:

- Implement Mitigation Measures BIO-1(a), BIO-1(b), BIO-2, and BIO-3(a).

Significance After Mitigation

To the extent that a local agency requires an individual project to implement all feasible and applicable mitigation measures described above, the impact would be less than significant with mitigation (LTS-M), for the same reasons described previously for implementation of Mitigation Measures BIO-1(a), BIO-1(b), BIO-2, and BIO-3(a), which would reduce impacts on special-status plants and wildlife, critical habitat, State- and federally protected wetlands, wildlife movement corridors, and wildlife nursery sites.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Although Mitigation Measures BIO-1(b) and BIO-2 are directly tied to existing regulations that are law and binding on responsible agencies and project sponsors, they would not apply to all areas considered sensitive natural communities. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions

of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. As described in Impacts BIO-1a, BIO-1b, and BIO-2, implementation of the projected forecasted development pattern, sea level rise adaptation projects, and transportation projects under the proposed plan could adversely affect special-status species and sensitive natural communities. The degree to which plan implementation could jeopardize a special-status species or sensitive natural community by substantially reducing the abundance, distribution, or viability of the species or natural community is unknown. However, because of their declining status, special-status species and sensitive natural communities are considered the most vulnerable to potential loss of viability. This impact would be potentially significant (PS). (Draft EIR, p. 3.5-58)

C. Mitigation Measure BIO-5 would reduce impacts by requiring implementation of Mitigation Measures BIO-1(a), BIO-1(b), BIO-2, and BIO-3(a) for the same reasons described previously for those measures.

2.4.5 Climate Change, Greenhouse Gases, and Energy (3.6)

IMPACT

GHG-1 Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to existing conditions that may have a significant impact on the environment (Draft EIR, p. 3.6-40)

Mitigation Measures

GHG-1 The applicable lead agency can and should implement, where feasible and as applicable to address site-specific construction climate change impacts, the following measures (or equally effective measures) to avoid or minimize impacts related to construction GHG emissions:

- Project proponents shall require its contractors to restrict the idling of on- and off-road diesel equipment to no more than 5 minutes while the equipment is on-site.
- Project proponents of new facilities shall implement waste, disposal, and recycling strategies (i.e., 10% recycled content for Tier 1 and 15% recycled content for Tier 2) in accordance with the voluntary measures for nonresidential land uses contained in Section A5.405 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.
- Project proponents of new facilities shall achieve or exceed the enhanced Tier 2 target for nonresidential land uses of recycling or reusing 80% of the construction waste as described in Section A5.408 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction.
- Project proponents shall require all diesel-powered, off-road construction equipment meet EPA's Tier 3 or Tier 4 emissions standards as defined in 40 CFR 1039 and comply with the exhaust emission

test procedures and provisions of 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment as it becomes available.

- Project proponents shall implement a program that incentivizes construction workers to carpool and use public transit or EVs to commute to and from the project site.

Significance After Mitigation

Implementation of Mitigation Measure GHG-1 would mitigate the GHGs emitted during the construction phase of the projected land use growth footprint, sea level rise adaptation, and transportation projects under the proposed plan. Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. If these mitigation measures were adopted by the implementing agency, construction related impacts could be reduced, but not necessarily to a less-than-significant level, and this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan is designed to reduce GHG emissions pursuant to SB 375, through designated growth geographies and complementary land use (e.g., H03, E04, E05), transportation (e.g., T03, T04, T05, T08, T09, T10, T11, T12), and environmental strategies (i.e., EN07, EN08, EN09).

B. The forecasted development pattern and transportation network improvements and programs of the final plan, combined with the implementation of federal and State regulations that would result in reduced GHG emissions from activities in the plan area, would lead to lower total GHG emissions in 2050 as compared to 2023. (Draft EIR, p. 3.6-43)

C. The level of GHG emissions from construction activity would depend on the type and scale of projects being constructed under the proposed plan. Generally, GHGs could be generated from a variety of activities and emission sources (e.g., exhaust emissions from off-road construction equipment, material delivery trips, and construction worker-commute trips). These emission types and associated levels fluctuate greatly depending on the particular type, number, and duration of usage for the varying equipment. The site preparation phase typically generates the most substantial emission levels because of the on-site equipment and ground-disturbing activities associated with grading, compacting, and excavation. Site preparation equipment and activities typically include backhoes, bulldozers, loaders, and excavation equipment (e.g., graders and scrapers). Construction activity tends to be temporary in nature for individual projects and would be expected to occur throughout the proposed plan's implementation period through 2050 because of the various land use growth footprint, sea level rise adaptation projects, and transportation projects that could be constructed. Where regulatory requirements or permitting requirements exist that are legally or otherwise binding on responsible agencies and project sponsors, it is reasonable to assume that they would be implemented, thereby reducing impacts. However, because construction emissions may not be reduced to net zero in all cases, this impact would be potentially significant (PS). (Draft EIR, p. 3.6-40)

D. Projected development as part of the final plan would increase direct and indirect GHG emissions from building electricity and natural gas use, water use, wastewater treatment, waste generation, and landscaping equipment. However, the final plan was designed to accommodate the people, households, and jobs identified in the regional growth forecast, and includes land use strategies that would promote denser or more compact development in designated Growth Geographies. These strategies would allow greater densities for new residential and commercial development in select Planned Development Areas (PDAs) and select Transit-Rich Areas and provide incentives to employers to shift jobs to housing-rich areas well served by transit. Increasing housing density generally results in fewer GHG emissions per capita, as well as the criteria pollutant emissions associated either directly or indirectly with a single person. This is because GHG emissions are considered more efficient when a given area houses a larger number of people in a smaller area. Therefore, the final plan would be considered more efficient in terms of emissions per capita because the forecasted development pattern would accommodate a greater number of people in existing infill areas. The proposed growth pattern would thereby limit an increase in emissions.

E. In addition, improved building energy efficiency standards and increased renewable energy sources for electricity would reduce future GHG emissions from new land use. Notably, as the California Energy Code continues to be updated on a triennial basis, future iterations of the California Energy Code will likely become more energy efficient than the current 2025 code, as well as include restrictions on the use of on-site natural gas consumption as the building sector trends toward decarbonization. Therefore, emissions from building energy consumption in 2035 may be overestimated. However, the exact level of energy efficiency and allowed on-site natural gas associated with future versions of the California Energy Code are unknown. However, AB 130 enacts restrictions on modifications to future iterations of the California Building Standards Code for residential development until 2031. AB 130's moratorium on updating the California Building Standards Code for residential development would affect the GHG reductions associated with future iterations of the California Building Standards Code which have historically increased the energy efficiency of buildings. Energy efficiency and renewable energy design features to reduce electricity demand and promote on-site renewable energy associated with future versions for the California Energy Code would not be realized for residential development beyond what is required by the 2025 version of the code. Because the projected development as part of the proposed plan would increase direct and indirect GHG emissions from building electricity and natural gas use, water use, wastewater treatment, waste generation, and landscaping equipment, implementation of the forecasted development pattern under the proposed plan would contribute toward a net increase in GHG emissions. This impact would be potentially significant (PS). (Draft EIR, pp. 3.6-40 to 3.6-41)

F. Implementation of Mitigation Measure GHG-1 would mitigate the GHGs emitted during the construction phase of projects under the final plan. (Draft EIR, p. 3.6-44) The measures in Mitigation Measure GHG-1 would mitigate GHGs by reducing emissions from construction equipment and worker commutes and by recycling construction waste to offset the need to produce new construction materials.

IMPACT

GHG-3 Conflict with an applicable State plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases (Draft EIR, p. 3.6-46)

Mitigation Measures

ABAG and MTC do not have authority to require the implementing agencies to adopt the identified mitigation measures but instead shall serve in a supportive role to assist implementing agencies in applying these measures. However, implementation of the following measures or other comparable measures identified by the lead agency at a project-level would reduce impacts related conflict with GHG emissions targets and agencies with jurisdiction to adopt these measures can and should do so (PRC Section 21081).

GHG-3 ABAG and MTC, in partnership with air districts in the plan area, shall work with the counties and cities in the plan area to adopt qualified GHG reduction plans (e.g., CAPs), develop GHG-reducing planning policies, and implement local climate initiatives, with the ultimate completion date to be achieved by the proposed plan's horizon year. These reductions can be achieved through a combination of programs, including zero net energy in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, and other measures. Notably, the development and implementation of GHG reduction plans would ultimately occur at the discretion of local agencies, counties, and municipalities. Nevertheless, ABAG and MTC shall contribute relevant data and protocols to assist in the development of inventories, forecasts, and GHG reduction strategies.

- Implement Mitigation Measures AQ-3(a) through AQ-3(d), TRA-2(a), and TRA-2(b).

Significance After Mitigation

Although many local jurisdictions in the region have released CAPs, additional implementation of CAPs in the region would continue to help to reduce GHG emissions from the land use projects that would be constructed under the proposed plan, as well as reducing GHG emissions from existing uses. Energy reduction incentive programs, such as those supported by the Bay Area Regional Network, would help reduce GHG emissions from energy usage in existing and new structures in the region. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions.

However, there is no assurance that this level of mitigation would achieve the regional reductions needed to attain the statewide 2030 and 2045 targets. Additional regulatory action that results in substantial GHG reductions throughout all sectors of the State economy and based on State-adopted regulations would likely be needed to attain such goals, and they are beyond the feasible reach of MTC and ABAG and local jurisdictions. Moreover, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Even with full implementation of the mitigation measure, forecasted emissions would not be reduced to target levels under SB 32 and AB 1279. Therefore, this impact would be **significant and unavoidable (SU).**

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan is designed to reduce GHG emissions pursuant to SB 375, through designated growth geographies and complementary land use (e.g., H03, E04, E05), transportation (e.g., T03, T04, T05, T08, T09, T10, T11, T12), and environmental strategies (i.e., EN07, EN08, EN09).

B. As discussed under Impact GHG-1, implementation of the final plan would result in a net reduction in GHG emissions from transportation sources and would result in more efficient GHG emissions per capita because the projected land use growth footprint would accommodate a greater number of people in the plan area compared to existing conditions.

C. The final plan is specifically designed to reduce regional VMT and use of fossil fuel consumption in the transportation and building sectors. Because the 2022 Scoping Plan directs local agencies to take action to reduce VMT, increase ZEV usage, and decarbonize buildings, and therefore contribute to achieving statewide GHG reduction targets, the 2022 Scoping Plan is a GHG reduction plan applicable to the proposed plan. The 2022 Scoping Plan outlines the primary strategies California intends to implement to achieve the legislative GHG emission target for 2030 and provide a pathway toward the State's 2045 climate goals. The 2022 Scoping Plan identifies the reductions needed by each GHG emission sector including transportation, industry, electricity generation, agriculture, commercial and residential, pollutants with high global warming potential, and recycling and waste. The 2022 Scoping Plan lays out the pathway to achieve the State's carbon neutrality goal and reduce anthropogenic GHG emissions by 85% below 1990 levels no later than 2045.

D. The Local Actions Appendix (Appendix D) to the 2022 Scoping Plan includes various recommendations that local governments can implement to align their planning and development review processes with the State's climate goals. Appendix D recommends that local governments focus on transportation electrification, VMT reduction, and building decarbonization (CARB 2022a). As detailed above, the proposed plan was specifically designed to reduce regional VMT and was prepared pursuant to SB 375. SB 375 seeks to reduce GHG emissions from the passenger-vehicle sector by reducing VMT in developed areas and areas planned for development in the jurisdictions of the State's 18 MPOs. Compliance with the reduction goals of SB 375 is identified in the 2022 Scoping Plan as a necessary component to achieving the short-term goal of reducing statewide GHG emissions to 40% below 1990 levels by 2030 as mandated by SB 32.

E. CARB adopted the most current SB 375 regional GHG reduction targets in March 2018. This includes the MTC and ABAG region's target for GHG emissions reductions of 19% per capita passenger vehicle as compared to 2005 levels by 2035 (CARB 2018). This reduction target adds to the GHG reductions achieved through the implementation of other statewide programs (e.g., Cap-and-Trade, RPS).

F. Although the final plan would be expected to meet the region's SB 375 target of reducing vehicle emissions by 19% by 2035 relative to 2005 levels, recent reports on the State's climate goals suggest that the regional 2035 GHG emissions reduction targets under SB 375 are not adequate to fully meet the GHG reduction goals of SB 32 (CARB 2022b). Collectively, CARB determined that if the State's 18 MPOs' all met the SB 375 GHG emission reduction targets set by CARB in 2018, a 19% reduction in per capita VMT would be achieved by 2035. In The Updated Final Staff Report to the Proposed Update to the SB 375 Greenhouse Gas Emission Reduction Targets, CARB expressed that to meet the statewide reduction goals set forth by SB 32, the State would need to reduce per capita GHG emissions by 25% by 2035, resulting in a 6% gap between the 19% emissions reductions targets set for the regions (averaged for the 18 MPOs and compared to a baseline year of 2005). Notably, CARB is required to update the reduction targets under SB 375 every 8 years and is currently conducting workshops to solicit input from stakeholders for the next target update planned for 2026.

G. Further, in the 2022 Progress Report California's Sustainable Communities and Climate Protection Act, CARB also states that an RTP/SCS that meets the applicable SB 375 targets alone will not result in the GHG emissions reductions necessary to meet State climate goals in 2030 nor in 2050 (CARB 2022b). CARB has also noted that greater reductions in VMT will be required to achieve overall GHG goals. Further, CARB states that California is still not reducing GHG emissions from personal vehicle travel as needed to meet climate commitments and as targeted under SB 375 (CARB 2022b). It will take collaboration among all the levels of government to identify the additional VMT reductions needed to achieve the State's climate goals because MPOs by themselves do not have the land use authority or resources to meet this challenge alone. Additional reductions would be needed in the transportation sector and all other GHG sectors to achieve the goals of SB 32 and AB 1279. The other sectors include how energy is sourced, generated, and used; how solid waste is generated, managed, and disposed of; treatment, conveyance, and uses of water supply and wastewater; energy sources and feedstocks for

industrial processes and activities; management of natural and working lands; and uses of high-GWP gases. Achieving GHG reductions from these sectors at the scale required to meet the goals of SB 32 and AB 1279 would require major changes to government regulation, private sector activity, consumer behavior, and other facets of life throughout California and beyond.

H. In the 2022 Scoping Plan, CARB identifies several pathways for each sector to close the reduction gap needed to achieve the targets of AB 1279. These will be achieved through building decarbonization, reducing the cap of the Cap-and-Trade Program, investing in the health of the State's natural and working lands, and ultimately reliance on carbon capture and sequestration technologies to eliminate residual emissions from those sectors CARB cannot independently regulate or control. The reductions achieved through SB 375 and the efforts of MPOs would contribute to the overall goal of carbon neutrality; however, this regulation is one component of many GHG reduction plans, policies, and actions taken by the State to reduce statewide emissions. Therefore, without sufficient State legislation and regulation, attainment of State goals is extremely difficult. This would be a potentially significant (PS) impact. (Draft EIR, pp. 3.6-46 to 3.6-48)

I. Implementation of Mitigation Measure GHG-3 would mitigate GHG emissions because the additional implementation of CAPs in the region would reduce GHG emissions from the land use projects constructed under the plan, as well as from existing uses, and energy reduction incentive programs, such as those supported by the Bay Area Regional Network, would help with reduce GHG emissions from energy usage in existing and new structures in the region. (Draft EIR, p. 3.6-49)

2.4.6 Cultural Resources and Tribal Cultural Resources (3.7)

IMPACT

CUL/TCR-1 Cause a substantial adverse change in the significance of a built environment historical resource as defined in Guidelines Section 15064.5 (Draft EIR, p. 3.7-26)

Mitigation Measures

CUL/TCR-1 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- Require a survey and evaluation of buildings and structures greater than 50 years in age within the area of potential effect to determine their eligibility for recognition under federal, State, and/or local historic preservation criteria. The evaluation shall be prepared by an architectural historian or historical architect meeting the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation-Professional Qualification Standards (SOI PQS). The evaluation shall comply with CEQA Guidelines Section 15064.5(b) and, if federal funding or permits are required, with Section 106 of the National Historic Preservation Act of 1966 (16 US Code Section 470 et seq.). Study recommendations shall be implemented.
- Realign or redesign projects to avoid impacts on known historical resources where possible.
- If avoidance of impacts to a significant historical resource is not feasible, implement additional mitigation options that include specific design plans for historic districts or plans for alteration or adaptive reuse of a historical resource that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. The application of the standards shall be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report meeting industry standards shall identify

and specify the treatment of character-defining features and construction activities and be provided to the lead agency for review and approval.

- If a project would result in the demolition or significant alteration of a historical resource, the resource shall be recorded prior to demolition or alteration. Recordation shall take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation and shall be performed by an architectural historian or historian who meets the SOI PQS. The documentation package shall be archived in appropriate public and secure repositories. The specific scope and details of documentation shall be developed at the project level in coordination with the lead agency.
- Comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect historical resources.

Significance After Mitigation

Implementation of Mitigation Measure CUL/TCR-1 would reduce impacts associated with historical resources because it would require the performance of professionally accepted and legally compliant procedures for the avoidance of known historical resources and the evaluation of previously undocumented historical resources. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact may be reduced to less than significant with mitigation (LTS-M) by avoidance or project redesign, by minimizing physical alterations, or by designing building use while retaining a property's historic character. However, CEQA Guidelines [CCR 15126.4(b)(2)] note that in some circumstances, documentation of a historical resource will not mitigate the effects of demolition of that resource to a less-than-significant level because the historic resources would no longer exist. The entire removal of a historically significant building or structure and/or the loss of character-defining features, however, would result in a significant and unavoidable (SU) impact. Therefore, this impact would be significant and unavoidable (SU).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan

strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Projects located in areas with known historical resources, located in communities with established historic preservation programs, or involving activities that would introduce new visual elements or disturb the existing terrain have the potential to result in significant historical resource impacts. These projects could potentially reduce the aesthetic and physical integrity of historic districts, buildings, and structures (e.g., bridges, towers, sculptures). A higher incidence of conflict with historical resources is expected to occur in urban areas with buildings that are more than 45 years old. The final plan designates Growth Geographies and identifies a set of land use strategies to accommodate the projected growth that results in focused housing and job growth concentrated primarily in or adjacent to developed areas and along existing transit corridors. Projects located in developed areas would be less likely to introduce new visual elements that could alter the visual character associated with historic districts or buildings. Projects located in or traversing rural lands could also have significant impacts related to sites that are singular examples of a historical setting or structures whose historic value and significance have not been previously evaluated and recognized. Construction could directly impact historical resources, and ongoing operation could have indirect impacts on historical resources. Identification of the degree and extent of impact requires project-specific analysis that includes a determination of the importance (i.e., the eligibility for local, State, or national register listing) of any historical resource recognized within a proposed alignment or project area. Given the magnitude and location of the forecasted development pattern and transportation projects involving construction activities in the proposed plan, it is possible that significant impacts on historical resources could occur. Because implementation of the final plan's forecasted development pattern, sea level rise adaptation projects, and transportation projects have the potential to significantly affect historical resources on a regional and localized level, these impacts would be potentially significant (PS). (Draft EIR, pp. 3.7-26 to 3.7-27)

C. Implementation of Mitigation Measure CUL/TCR-1 would reduce impacts associated with historical resources because it would require the performance of professionally accepted and legally compliant procedures for the avoidance of known historical resources and the evaluation of previously undocumented historical resources. (Draft EIR, p. 3.7-28)

IMPACT

CUL/TCR-2 Cause a substantial adverse change in the significance of a unique archaeological resource or a historical resource of an archaeological nature as defined in Guidelines Section 15064.5 (Draft EIR, p. 3.7-29)

Mitigation Measures

CUL/TCR-2 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below:

- Before construction activities, project sponsors shall retain a qualified archaeologist to conduct a record search at the appropriate information center to determine whether the project area has been previously surveyed and whether resources were identified; the record search shall include contacting the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. If a survey of the project area has not been conducted in the last 5 years, project sponsors shall retain a qualified archaeologist to conduct archaeological surveys prior to construction activities. Project sponsors shall follow recommendations identified in the survey, which may include activities such as subsurface testing, designing and implementing a Worker Environmental Awareness Program, construction monitoring by a qualified archaeologist, avoidance of sites, or preservation in place.

- Areas determined to be of cultural significance shall be monitored during the grading, excavation, trenching, and removal of existing features by a qualified archeologist and culturally affiliated California Native American tribal monitor.
- To ensure that new transportation facilities do not adversely affect potentially buried archaeological deposits, an underwater archaeological survey shall be conducted to identify, evaluate, and protect significant submerged cultural resources prior to activities that would disturb the shoreline or the floor of the bay. Additionally, the archaeologist shall request a search of California State Lands Commission's Shipwreck Database.
- When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource (CEQA Guidelines Section 15064.5[c][1]). If archaeological resources identified in the project area are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, and/or local register and to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, culturally affiliated California Native American tribal representatives shall be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing.
- If precontact archeological resources are identified through survey or discovered in the project area, the culturally affiliated California Native American tribe shall be notified. Both the archeologist and tribal monitor or tribal representative should strive for agreement on the determined significance of an artifact or cultural resource.
- If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place (CEQA Guidelines Section 15126.4[b]; PRC Section 21083.2). Preservation in place may be accomplished by, but is not limited to, avoidance by project design, incorporation within parks, open space or conservation easements, covering with a layer of sterile soil, or similar measures. If preservation in place is feasible, mitigation is complete. Additionally, where the implementing agency determines that an alternative mitigation method is superior to in-place preservation, the project sponsor and/or implementing agency may implement such alternative measures.
- When preservation in place or avoidance of historical or unique archaeological resources are infeasible, data recovery through excavation shall be required (CEQA Guidelines Section 15126.4[b]). Data recovery would consist of approval of a Data Recovery Plan and archaeological excavation of an adequate sample of site contents so that research questions applicable to the site can be addressed. For precontact sites, the culturally affiliated California Native American tribe shall be afforded the opportunity to monitor the ground-disturbing activities. If only part of a site would be impacted by a project, data recovery shall only be necessary for that portion of the site. Data recovery shall not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Confidential studies and reports resulting from the data recovery shall be deposited with the Northwest Information Center. Mitigation may include curation for artifacts removed during data recovery excavation.
- If archaeological resources are discovered during construction, all work near the find shall be halted and the project sponsor and/or implementing agency shall follow the steps described under CEQA Guidelines Section 15064.5(f), including an immediate evaluation of the find by a qualified archaeologist (36 CFR Section 61) and implementation of avoidance measures or appropriate

mitigation if the find is determined to be a historical resource or unique archaeological resource. If the find is a precontact archaeological site, the culturally affiliated California Native American tribe shall be notified and afforded the opportunity to monitor mitigative treatment. During evaluation or mitigative treatment, ground disturbance and construction work could continue on other parts of the project area.

- Integrate curation of all historical resources or an archaeological nature or unique archaeological resources and associated records in a regional center focused on the care, management, and use of archaeological collections. All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves will be negotiated during consultation with the culturally affiliated California Native American tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research.
- Project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect archaeological resources.

Significance After Mitigation

Implementation of Mitigation Measure CUL/TCR-2 would reduce impacts associated with archaeological resources because it would require the performance of professionally accepted and legally compliant procedures for the discovery of previously undocumented significant archaeological resources. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact may be less than significant with mitigation by avoiding or preserving in place unique archaeological resources through project design, and by avoiding or preserving inadvertent discoveries of significant archaeological resources through project redesign. If avoidance or preserving in place is infeasible, direct impacts may be reduced to a less-than-significant level by minimizing disturbance or undertaking additional investigation to determine the significance and integrity of the portion of the archaeological resource within the project area. The destruction or substantial alteration of the contributing physical characteristics or character of the physical setting of a unique archaeological resource or historical resource of an archaeological nature, however, would result in a significant and unavoidable (SU) impact.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Implementation of the forecasted development pattern, sea level rise adaptation projects, and transportation projects could result in archaeological impacts if construction activities include the disturbance of previously identified or unidentified archaeological resources. Projects involving excavation, grading, or soil removal in previously undisturbed areas have the greatest likelihood of encountering significant archaeological resources. Likewise, the establishment of staging areas, temporary roads, and other temporary facilities necessary for construction activities has the potential to affect these cultural resources. Both rural land conversion and urban infill have the potential to disturb archaeological resources, although rural areas are more likely to contain intact archaeological resources that are situated in their historic context because these areas are less likely to have been subject to previous ground disturbance.

C. Portions of the forecasted development pattern located in areas of sensitivity, such as the historic margins of San Francisco and San Pablo Bays, ridgetops, midslope terraces, hill bases, alluvial flats, and inland valleys, are more likely to encounter archaeological resources. Sea level rise adaptation projects under the final plan include a variety of levees, seawalls, elevated roadways, marsh restoration, and tidal gates. Ground-disturbing construction of levees, seawalls, marsh restoration, and tidal gates would occur in the archaeologically sensitive areas of the San Francisco and San Pablo Bays, in areas that are likely to have not been developed. Sea level rise adaptation projects such as elevated roadways, although also located in these same sensitive areas, would likely be located in previously disturbed areas, because they would follow existing roadways.

D. Transportation corridors typically follow valleys and drainage areas, which often correspond with historic settlement patterns. Infill development and transportation projects involving improvements within existing urban areas, within existing transportation corridors, or to existing infrastructure or operations are less likely to affect archaeological resources because these projects are generally located in already-disturbed areas that typically have been subject to previous cultural resource surveys; as described previously, historically significant data are unlikely to be gained from archaeological materials located in areas that have been disturbed. Therefore, encountering intact, previously unknown archaeological resources, still associated with an archaeological site in its historic context, during ground-disturbing activities is less likely. Some transportation projects, particularly new rail projects, could be located in areas that have not been subject to previous ground disturbance. The degree and extent of impacts would depend upon project location and construction methods. Project-specific analysis would be required to determine the precise area of impact and the value (i.e., the eligibility for local, State, or national register listing) of any archaeological resource identified within a proposed alignment or project area. Furthermore, all projects undertaken or overseen by Caltrans must abide by extensive procedures and policies, outlined in the Standard Environmental Reference, Vol 2: Cultural Resources, which dictates the nature and extent of cultural resource protections consistent with State and federal law. Because ground disturbance has the potential to disturb unique archeological resources, this impact is potentially significant (PS). (Draft EIR, pp. 3.7-29 to 3.7-30)

E. Implementation of Mitigation Measure CUL/TCR-2 would reduce impacts associated with archaeological resources because it would require the performance of professionally accepted and legally compliant procedures for the discovery of previously undocumented significant archaeological resources. (Draft EIR, p. 3.7-32).

IMPACT

CUL/TCR-4 Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe (Draft EIR, p. 3.7-34)

Mitigation Measures

CUL/TCR-4(a) If the implementing agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, implementing agencies and/or project sponsors shall implement the following measures (or equally effective measures), where feasible and as applicable, to address site-specific impacts and avoid or minimize the significant adverse impacts:

- Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource (PRC Section 21084.3[a]). If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process, provisions in the PRC describe mitigation measures that, if determined by the lead agency to be feasible, may avoid or minimize the significant adverse impacts (PRC Section 21084.3[b]). Examples include:
    - avoiding and preserving the resources in place, including planning and constructing to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria;
    - treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including:
        - protecting the cultural character and integrity of the resource,
        - protecting the traditional use of the resource, and
        - protecting the confidentiality of the resource;
    - establishing permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places; and
    - protecting the resource.
- The implementing agency shall determine whether or not implementation of a project would indirectly affect tribal cultural resources by increasing public visibility and ease of access. If it would, the implementing agency shall take measures to reduce the visibility or accessibility of the tribal cultural resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation, such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting tribal cultural resources. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area.

CUL/TCR-4(b) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable a based on project- and site-specific considerations, that include those identified below:

- Implement Mitigation Measure CUL/TCR-2.

Significance After Mitigation

Implementation of Mitigation Measure CUL/TCR-4 would reduce impacts associated with tribal cultural resources because it would require the performance of professionally accepted and legally compliant procedures for the identification of tribal cultural resources associated with subsequent projects. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact may be less than significant (LTS-M) by avoiding or preserving in place tribal cultural resources through project design. If avoidance or preserving in place is infeasible, disturbance of a tribal cultural resource, however, would result in a significant and unavoidable (SU) impact.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Potential impacts on tribal cultural resources would be similar to those discussed for archaeological resources under Impact CUL/TCR-2. Implementation of the forecasted development pattern, sea level rise adaptation projects, and transportation projects involving construction activities that would disturb native terrain, including excavation, grading, or soil removal, would have the greatest likelihood to encounter tribal cultural resources. Because ground disturbance has potential to disturb tribal cultural resources, this impact is potentially significant (PS). (Draft EIR, p 3.7-34)

C. In compliance with AB 52, MTC sent letters to 101 Native American tribal representatives. MTC received a response from the Federated Indians of Graton Rancheria (Graton Rancheria). There was an initial exchange to schedule an initial meeting, though a consultation meeting was not scheduled. See "Findings Regarding Tribal Cultural Resources and Native American Coordination" below for more information.

D. Implementation of Mitigation Measure CUL/TCR-4(a) and CUL/TCR-4(b) would reduce impacts associated with tribal cultural resources because it would require the performance of professionally accepted and legally compliant procedures for the identification of tribal cultural resources associated with subsequent projects. (Draft EIR, p 3.7-35)

2.4.7 Geology, Seismicity, and Mineral Resources (3.8)

IMPACT

GEO-7 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature (Draft EIR, p. 3.8-37)

Mitigation Measures

GEO-7 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the PRC, adopted county and city general plans, and other federal, state, and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices for the assessment and mitigation of adverse impacts on paleontological resources.
- Obtain review by a qualified paleontologist to determine whether the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological resources or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey if units with paleontological potential are present at the surface.
- Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.
- Implement the following measures where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:
    - All on-site construction personnel shall receive Worker Education and Awareness Program training before the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered.
    - A qualified paleontologist shall prepare a paleontological resource management plan (PRMP) to guide the salvage, documentation, and repository of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during construction, qualified paleontologist shall oversee the implementation of the PRMP.
    - Ground-disturbing activities in parent material with a moderate to high potential to yield unique paleontological resources shall be monitored using a qualified paleontological monitor to determine whether unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols.
- Identify where ground disturbance is proposed in a geologic unit having the potential to contain fossils, and specify the need for a paleontological monitor to be present during ground disturbance in these areas.
- Avoid routes and project designs that would permanently alter unique geological features.
- Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.

- If paleontological resources are discovered during earthmoving activities, the construction crew will be directed to immediately cease work and notify the implementing agencies and/or project sponsors. The project sponsor will retain a qualified paleontologist for identification and salvage of fossils so that construction delays can be minimized. The paleontologist will be responsible for implementing a recovery plan which could include the following:
    - in the event of discovery, salvage of unearthed fossil remains, typically involving simple excavation of the exposed specimen but possibly also plaster-jacketing of large and/or fragile specimens, or more elaborate quarry excavations of richly fossiliferous deposits;
    - recovery of stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including description of lithologies of fossil-bearing strata, measurement and description of the overall stratigraphic section, and photographic documentation of the geologic setting;
    - laboratory preparation (cleaning and repair) of collected fossil remains to a point of curation, generally involving removal of enclosing rock material, stabilization of fragile specimens (using glues and other hardeners), and repair of broken specimens;
    - cataloging and identification of prepared fossil remains, typically involving scientific identification of specimens, inventory of specimens, assignment of catalog numbers, and entry of data into an inventory database;
    - transferal, for storage, of cataloged fossil remains to an appropriate repository, with consent of property owner;
    - preparation of a final report summarizing the field and laboratory methods used, the stratigraphic units inspected, the types of fossils recovered, and the significance of the curated collection; and
    - project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect paleontological or geologic resources.
- Prepare significant recovered fossils to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility.
    - Following the conclusion of the paleontological monitoring, ensure that the qualified paleontologist prepares a report stating that the paleontological monitoring requirement has been fulfilled and summarizes the results of any paleontological finds. The report should be submitted to the CEQA lead agency and to the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including the treatment of paleontological materials; results of specimen processing, analysis, and research; and final curation arrangements.

Significance After Mitigation

Implementation of Mitigation Measure GEO-7 would reduce impacts associated with paleontological resources because construction workers would be alerted to the possibility of encountering paleontological resources, and professionally accepted and legally compliant procedures for the discovery of paleontological resources would be implemented in the event of a find. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact would be less than significant with mitigation (LTS-M).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt

mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. Final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Potential impacts on paleontological or geologic resources would be similar to those identified for archaeological resources discussed under Impact CUL/TCR-2. Projects involving excavation, grading, or soil removal in previously undisturbed areas have the greatest likelihood to encounter these resources. The degree and extent of impacts would depend upon project location, and as such, project-specific analysis would be required to determine the precise area of impact and the importance of any paleontological or geologic resource identified within a proposed alignment or project area. This would be a potentially significant (PS) impact. (Draft EIR, p. 3.8-37)

C. Implementation of Mitigation Measure GEO-7 would reduce impacts associated with paleontological resources because construction workers would be alerted to the possibility of encountering paleontological resources, and professionally accepted and legally compliant procedures for the discovery of paleontological resources would be implemented in the event of a find. (Draft EIR, p. 3.8-39)

2.4.8 Hazards and Wildfire (3.9)

IMPACT

HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment (Draft EIR, p. 3.9-36)

Mitigation Measures

HAZ-4 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- The project proponent shall perform a records review to determine whether there is existing permitted use of hazardous materials or documented evidence of hazardous waste contamination on the project site and provide the results of this investigation to the implementing agency.

- For any project located on or near a hazardous materials and/or waste site pursuant to Government Code Section 65962.5 or sites that have the potential for residual hazardous materials as a result of historic land uses, project proponents shall prepare a Phase I ESA in accordance with the American Society for Testing and Materials' E1527-05 standard.
- For any project located on or near sites that are not listed and do not have the potential for residual hazardous materials as a result of historic land uses, no action is required unless unknown hazards are discovered during development. In that case, the implementing agency shall discontinue development until DTSC, RWQCB, the local air district, and/or other responsible agency issues a determination, which would likely require a Phase I ESA as part of the assessment.
- Develop, train, and implement worker awareness and protective measures to minimize worker and public exposure to an acceptable level and to prevent environmental contamination as a result of construction.
- Projects preparing a Phase I ESA, where required, shall fully implement the recommendations contained in the report. If a Phase I ESA indicates the presence or likely presence of contamination, the project proponent shall prepare a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented.
- Consult with the appropriate local, State, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.

Significance After Mitigation

Site evaluation, sampling, and remediation through the Phase I/II ESA process is widely accepted as the appropriate standard for the preliminary evaluation of site hazards. Preparation of, and compliance with, a Phase I ESA for properties at risk of potential hazardous materials and/or waste contamination would avoid adverse impacts associated with buildout because the ASTM procedures establish prescriptive procedures that fully evaluate the potential for risks and appropriate next steps if potential contamination is identified. Phase I/II ESAs required by Mitigation Measure HAZ-4 would include procedural measures to protect and isolate suspected contaminated materials to avoid adverse effects on the workers or public. Therefore, the Phase I/II ESA process would adequately mitigate the potential for future development to create a significant hazard to the public or the environment because it is located on a site that is included on a list of hazardous materials sites. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact would be less than significant with mitigation (LS-M).

Projects taking advantage of CEQA streamlining provisions of Senate Bill 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Findings

A. Throughout the plan area, there are many sites where historical releases of hazardous materials or wastes have occurred; these are listed in environmental databases pursuant to Government Code Section 65962.5. Precise locations of future land use and sea level rise adaptation projects are unknown, so an evaluation of the potential for specific sites of known contamination within the plan area to be affected by project activities cannot be conducted at this time.

B. Grading and excavation activities may expose construction workers and the public to hazardous substances present in the soil or groundwater that are not anticipated based on information about existing site conditions. These construction activities could inadvertently disperse contaminated material into the environment and expose construction personnel to potentially hazardous conditions. These risks would be greatest for construction workers; however, it is possible that the nearby public could be affected if the contaminated materials are of sufficient volume. Unless construction activities are coordinated with site remediation activities, there could be a temporary increased risk of damaging or interfering with remediation site controls, such as soil containment areas.

C. Phase I and Phase II ESAs are commonly used to determine the likelihood of contamination at a site, test soil and/or groundwater for contamination, and inform remediation activities.

D. To be declared a sustainable communities project under PRC Section 21155.1(a)(3), projects must demonstrate that they are not located on any list of facilities and sites compiled pursuant to Section 65962.5 of the Government Code, and the site must be subject to a PEA, which is a type of environmental document typically prepared for sites with DTSC oversight. Overall, PEA requirements are more comprehensive than the requirements for Phase I ESAs.

E. With the notable exceptions for streamlining sustainable communities projects and siting public schools, as discussed above, there are no general regulatory requirements to conduct a Phase I ESA or PEA or a subsequent investigation of potential contamination. Therefore, because it cannot be assumed these practices would regularly occur, the impacts related to changes in land use from implementation of the final plan would be potentially significant (PS). (Draft EIR, pp. 3.9-36 to 3.9-37)

F. Final plan implementation would result in the construction and operation of the forecasted development pattern and sea level rise adaptation projects. If future development associated with the forecasted development pattern and sea level rise projects is located on a listed hazard site that has not been investigated or remediated properly, operation of such projects would have the potential to create a significant hazard to the public or the environment. Because this impact is primarily construction-related, it cannot be assumed that Phase I ESA or PEA or subsequent investigation of potential contamination would regularly occur, the impacts related to changes in land use from implementation of the final plan would be potentially significant (PS). (Draft EIR, p. 3.9-37)

G. In addition to the hazards described above, land adjacent to roadways may also contain elevated concentrations of lead in exposed surface soils, which could pose a health hazard to construction workers and users of the properties. Lead is a state-recognized carcinogen and reproductive toxicant. Exposure to lead in soil could result in adverse health effects, depending on the duration and extent of exposure. Substantial quantities of aerially deposited lead are understood to be generally confined to within 30 feet of a roadway. Other potential contaminants, including herbicides associated with weed abatement and contaminated ballast rock, are generally confined to the immediate transportation right-of-way. As with land use projects and development, exposure to these hazardous materials and wastes from construction of transportation projects could cause adverse effects on construction workers, the public, or the environment. The hazards associated with construction of transportation projects on known sites of contamination at the regional level would be potentially significant (PS) for the same reasons identified above for land use and sea level rise adaptation projects. (Draft EIR, pp. 3.9-37 to 3.9-38)

H. Soil management plans or soil contingency plans required as part of Phase I/II ESAs by Mitigation Measure HAZ-4 would include procedural measures to protect and isolate suspected contaminated materials to avoid adverse effects on the workers or public. (Draft EIR, p. 3.9-39)

IMPACT

HAZ-6 Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan (Draft EIR, p. 3.9-41)

Mitigation Measures

HAZ-6 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- Continue to participate in the San Francisco Bay Area Regional Transportation Emergency Management (RTEMP), review the plan annually, and update as appropriate.

Develop new methods of conveying projected and real time evacuation information to citizens using emerging electronic communication tools including social media and cellular networks.

Adopt and/or revise, as appropriate, local emergency response and evacuation plans that address growth and potential for congestion on evacuation routes. Include contingencies for lower private automobile ownership and reliance on public transit for evacuation, consistent with the RTEMP.

Require specific projects to demonstrate consistency with all applicable emergency response and evacuation plans. Where temporary road closures would be required during construction, prepare traffic mitigation plans that address traffic control and establish alternate emergency response and evacuation routes in coordination with emergency service providers.

Significance After Mitigation

The mitigation described above would address the need for adequate emergency access through continued participation in the RTEMP. It would also require that emergency plans account for shifting transportation modes. The mitigation would also require individual projects to ensure that future development would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. To the extent that a local agency requires an individual project to implement all feasible mitigation measures described above, the impact would be less than significant with mitigation (LS-M).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Findings

A. Although construction associated with implementation of the final plan could temporarily impair roadways used for emergency response and evacuation, standard construction procedures for development of a construction management plan would address these conditions and would develop alternative routes. Projects requiring encroachment permits for temporary construction activities in public roadways that could be used for emergency response or evacuation are generally required to prepare traffic mitigation plans that address traffic control during the period when project construction is occurring within public right-of-way. Standard construction procedures provided in traffic mitigation plans to address temporary road closures that would be required during construction, include notification of emergency responders. Although implementation of construction traffic management plans and associated coordination with service providers would typically address potential interference with emergency response or evacuation plans, there is a potential that temporary impairment could occur at the project level. This would be potentially significant (PS). (Draft EIR, pp. 3.9-41 to 3.9-42)

B. Development that proposes large concentrations of people (such as a job center) or that would site individuals who require special assistance (such as a hospital or senior facility) in an area with identified hazards could cause adverse effects related to the implementation of countywide and jurisdictional emergency plans because there would be more individuals potentially subject to these hazards. High density development could, in the event of an emergency such as a wildfire, result in more people using the same evacuation routes. Implementation of emergency plans could be impaired if emergency plans are not properly updated to reflect changes in land use. While transportation projects may result in a more efficient transportation system, it cannot be assured that, during an emergency, they would be adequate for sufficiently quick evacuation. Transportation projects footprints would be increased, but the increase in population and employment will result in an increase in the average trip time of 19%, suggesting an overall increase in congestion.

C. There are a variety of adopted emergency response and evacuation plans in the plan area. In addition to the plans maintained at the county-level, coordinated plans have been adopted for the nine-county plan area to facilitate emergency response and evacuation. These plans anticipate the necessity of regional transit and ferry service to facilitate response and evacuation. Using transit systems, including buses, train, and ferries, is an additional means of evacuating people during a less rapid but urgent evacuation in addition to highway evacuation via personal automobile. The final plan includes investments in transit systems along with the emphasis on growth near transit that could serve as vital resources. However, increased population and employment anticipated in the plan could increase congestion on evacuation routes and slow evacuation. This could impair implementation of emergency response or evacuation plans, particularly if local plans rely on evacuation via personal vehicle. While changes in land use would be reflected in updated emergency and evacuation plans, it is not known if the changes would be sufficient to ensure adequate evacuation. The final plan's impact on adopted emergency response or evacuation plans would be potentially significant (PS). (Draft EIR, pp. 3.9-42 to 3.9-43)

D. Construction associated with sea level rise adaptation projects would not hinder emergency response activities or physically interfere with established evacuation routes. Projects requiring encroachment permits for temporary construction activities along public roadways that could be used for emergency response or evacuation are generally required to prepare traffic mitigation plans that address traffic control during the period when project construction is occurring within public right-of-way. To address any temporary road closures that would be required during construction, standard construction procedures include notification of emergency responders. Although implementation of traffic mitigation plans and associated coordination with service providers would typically address potential interference with emergency response or evacuation plans, there is potential that temporary impairment could occur at the project level. This would be potentially significant (PS). (Draft EIR, p. 3.9-43). Construction associated with transportation projects would not likely hinder implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

However, standard construction mitigation includes notification of emergency responders where road closures are required. Road closures would be temporary and would be coordinated with emergency responders so that alternative evacuation routes could be developed and employed. Projects requiring encroachment permits for temporary construction activities in public roadways that could be used for emergency response or evacuation are generally required to prepare traffic mitigation plans that address traffic control during the period when project construction is occurring within public right-of-way. Although implementation of traffic mitigation plans and associated coordination with service providers would typically address potential interference with emergency response or evacuation plans, there is potential that temporary impairment could occur at the project level. This would be potentially significant (PS). (Draft EIR, p. 3.9-44)

E. Mitigation Measure HAZ-6 would reduce significant impacts because it would require MTC to continue to participate in the RTEMP and that emergency plans account for shifting transportation modes. It would require also individual projects to ensure that future development would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan.

IMPACT

HAZ-7 Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones (Draft EIR, p. 3.9-45)

Mitigation Measures

HAZ-7 Implementing agencies and/or project sponsors shall implement measures, as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- Ensure that development of areas mapped by CAL FIRE as high and very high fire hazard severity zones complies with Title 14 of the California Code of Regulations minimum wildfire protection standards.
- Implementing agencies shall improve and educate residents and businesses regarding local emergency communications and notifications.
- Implementing agencies shall enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures.
- Implementing agencies shall provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.
- Implementing agencies shall plan for and promote rapid revegetation of burned areas to help prevent erosion and protect bare soils.
- Implementing agencies shall develop a regulatory mechanism for permitting an aggressive hazardous fuels management program.
- Implementing agencies shall establish standards for fuel breaks that can slow or stop a wildfire advancing into a community or into the wildlands. Fuel breaks shall be strategically located to protect a community, structures, or routes of access and egress. Strategic locations may include ridgelines, greenbelts, or other locations to manage embers or support community-level fire suppression tactics.
- MTC shall facilitate minimizing future impacts to fire protection services through information sharing regarding fire-wise land management (vegetation data, fire-resistant building materials, locations where development is vulnerable to wildfire, and best practices for safe land management) with county and city planning departments.

- MTC, in partnership with technical experts and stakeholders, shall launch or continue existing initiatives to help local cities and counties to protect Bay Area communities and economies from the disruption of wildfire occurrences. Initiatives could include but not be limited to seminars that review the risk of wildfire and approaches for preparation, including strengthening of infrastructure, emergency services, emergency evacuation plans and reviewing building safety codes.

Significance After Mitigation

Curtailing development in areas mapped by CAL FIRE as high and very high FHSZs, in conjunction with the mitigation measures and elements of the plan that would promote land management in open space to reduce fire hazards, would substantially reduce the potential for the plan to exacerbate wildland fire risks. However, because development could occur in and near SRAs and lands classified as very high FHSZs, and because the potential for people or structure to be exposed to significant risk of loss, injury, or death involving wildfire cannot be avoided, this impact would be **significant and unavoidable (SU).**

Projects taking advantage of CEQA streamlining provisions of Senate Bill 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities. Very High and High Fire Hazard Severity Areas identified by the California Department of Forestry and Fire Protection or locations within a county-adopted wildland-urban interface area are excluded from growth geographies.

B. Wildfire is addressed through the plan's core adaptation principles related to land use, land management, and structural hardening efforts. Features of the plan that would reduce the potential to exacerbate the risk of wildfire include maintaining the urban growth boundaries, directing growth away from areas with the highest fire hazard severity potential, and supporting vegetation management on conservation lands. Specifically, the final plan includes Strategy EN4, Maintain Urban Growth Boundaries, which does not enable growth beyond current boundaries and locates Growth Geographies (Priority Development Areas, Priority Production Areas, Transit-Rich Areas, High-Resource Areas) outside of the worst FHSZs (as defined by CAL FIRE's Very High FHSZs in incorporated areas and by High or Very High FHSZs in unincorporated areas). These restrictions would be augmented by WUI zones, where they have been adopted at the county level. Together, these strategies limit further growth in the areas most at risk of wildfire. Open space and working lands management is included in the final plan to reduce the intensity of future fires. Specifically, Strategy EN05, Protect and Manage High-Value Conservation Lands, includes expanded new revenues beyond what already exist to support wildfire management. Structural hardening combats the risk in communities already built in the highest fire risk zones. Strategy EN2,

Provide Means-Based Financial Support for Seismic, Wildfire, and Accessibility Home Retrofits, includes fire-resistant roofing and defensible space retrofits for 105,000 homes. Together, these strategies would focus future growth away from the highest fire risk zones, support increased wildland management programs, and support residential building upgrades that reduce the likelihood for damage when fires occur in the WUI. Another component of the final plan's environmental approach would provide means-based financial support to retrofit existing residential buildings. This could reduce the potential for these structures to cause fires due to damage caused by a seismic event.

C. As the population of the plan area is forecasted to increase, there could be increased wildfire hazards if development expands into the wildland-urban interface (WUI). The final plan's Growth Geographies—designated areas prioritized to accommodate future household and job growth—avoid areas defined as "Very High" and "High" FHSZs identified by CAL FIRE (see Section 2.3.4). Additionally, the final plan addresses wildfire with many land use (i.e., housing and economy) and environmental strategies, relying on core adaptation principles: land use, land management, and structural hardening. The final plan would accommodate forecasted population growth in a manner that reduces potential contributions to climate change, encourages concentrated growth in urbanized areas and land management in open space, and includes structural hardening efforts where existing structures are vulnerable to fire. . In total, the land use growth footprint includes approximately 540 acres of land classified as having a moderate, high, or very high fire hazard. This is less than 2% of the growth footprint.

D. Indirect wildfire impacts include release of hazardous materials and air quality implications, as well as flooding and landslides following loss of vegetation. In areas with steep slopes, debris flows can result from loss of vegetation and cause hazards to life and physical property, destroy or strip vegetation, block existing drainage patterns, and affect roadways and other infrastructure. If this were to occur within existing floodplains, existing flow conditions may be altered, or new sources of flooding may be created.

E. Development of areas susceptible to wildfire could exacerbate the fire risk by introducing anthropogenic influence into fire-prone open space. Human-caused wildfires tend to be generated by activities such as debris and brush-clearing fires, electrical equipment malfunctions, campfire escapes, smoking, fire play (e.g., fireworks), vehicles, and arson. Power lines also pose a risk of spark as a result of downed lines, direct contact with vegetation, and line faults and equipment failures.

F. Throughout the plan area, new construction would be subject to Title 24 of the CCR, which includes safety measures to minimize the threat of fire. The provisions of the fire code would apply to all construction, alteration, replacement, removal, and demolition. The risk of accidental ignition of a wildland fire during construction in forested areas would be addressed through standard construction practices, which address the potential for sparks generated by construction equipment, the potential for spills of ignitable materials, and emergency procedures to immediately respond to these conditions. In addition, Title 14 of the CCR sets forth the minimum development standards for emergency access, fuel modification, setback, signage, and water supply, which help prevent damage to structures or people by reducing wildfire hazards within SRAs. Local jurisdictions' general plan policies and building codes enforce and expand on these requirements at the local level. All jurisdictions are required to review and update their safety element in conjunction with the next housing element revision to address the risk of fire in SRAs and Very High FHSZs and the provisions outlined in "Fire Hazard Planning" by the Governor's Office of Land Use and Climate Innovation. Projects developed under the plan would not be approved by local agencies until project design plans demonstrate compliance with applicable fire safety requirements. The final plan would not conflict with the ongoing efforts of CAL FIRE and others to create natural environments that are more resilient to fire through fire plans that include prefire planning and fuel treatment. Projects located on land identified by CAL FIRE as subject to wildland fire hazard would not qualify as sustainable communities projects under PRC Section 21155.1 unless the applicable general plan or zoning code contains provisions to mitigate the risk of a wildland fire hazards (PRC Section 21155.1[a][6][A]). (Note, however, that PRC Section 21155.1[a][6][A] is applicable only to projects seeking potential exemptions under the sustainable communities strategy provisions of CEQA

and does not apply to the other streamlining strategies under the Sustainable Communities Act.) Because development could occur near land classified as very high FHSZs and could indirectly result in extension or expansion of infrastructure through these areas, there is potential for the final plan to exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides. This impact would be potentially significant (PS).) (Draft EIR, pp. 3.9-46 to 3.9-48).

G. Transportation projects could occur in in moderate, high, and very high fire hazard areas. Implementing agencies would require project sponsors to comply with safety measures that minimize the threat of fire as stated in the Title 24 of the CCR, as well as comply with CCR Title 14, Division 1.5 to minimize exposing people and structures to loss, injury, or death and damage. Therefore, although there could be an elevated risk of accidental ignition of a wildland fire during construction in forested areas, the potential for standard construction practices to result in wildland fire would not be substantially increased because of the transportation investments identified in the plan. Projects that involve the expansion or extension of the transportation system may also expose more land uses to risks associated with wildland fires, particularly at the urban edge. Providing increased access into wildfire-prone open space increases the potential for human-caused wildfires both as a result of direct access and due to the introduction of potential ignition sources (e.g., vehicles, cigarettes) along the transportation corridor. However, transportation improvements, especially capacity improvements, also generally improve the transportation network to move people more efficiently. This is beneficial for emergency access and evacuation due to a wildfire. The potential for wildfire hazard impacts related to transportation projects in the final plan would be potentially significant (PS) due to the potential for the infrastructure to exacerbate fire risk. (Draft EIR, pp. 3.9-49 to 3.9-50)

H. Mitigation Measure HAZ-7 would substantially reduce the potential for the plan to exacerbate wildland fire risks because it would restrict development in areas mapped by CalFire as high and very high fire hazard zones and through additional measures that, with elements of the plan, would promote land management in open space to reduce fire hazards. (Draft EIR, p. 3.9-42)

2.4.9 Land Use, Population, and Housing (3.11)

IMPACT

LU-1 Physically divide an established community (Draft EIR, p. 3.11-20)

Mitigation Measures

LU-1 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- Orient transportation projects to minimize impacts on existing communities by:
    - selecting alignments within or adjacent to existing public rights-of-way;
    - designing sections above or below grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project; and
    - wherever feasible incorporating direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).
- Where it has been determined that it is infeasible to avoid creating a barrier in an established community, encourage implementing agencies to consider other measures to reduce impacts, including but not limited to:
    - shifting alignments to minimize the area affected;

- reducing the proposed right-of-way take to minimize the overall area of impact; and
- providing for bicycle, pedestrian, and vehicle access across improved roadways.

Significance After Mitigation

Implementation of Mitigation Measure LU-1 would reduce the potentially significant impact of division of an established community because it would implement design features that would improve access and connections within existing communities and to public transit, which would reduce the effects of separation on existing communities. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, because sites are unique, it cannot be concluded with certainty that all potentially significant divisions of established communities could be avoided. This impact would remain **significant and unavoidable (SU)**.

Findings

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. Most of the major proposed transportation projects would be located in existing rights-of-way, meaning they would not create a new physical division within existing communities. Some projects in the final plan could improve or expand interconnections between neighborhoods and communities that are currently separated by major transportation corridors. Examples include bridges or undercrossings (with bike lanes) of commuter rail lines, bicycle/pedestrian overcrossings of freeways, and urban trail and pathway projects. Additionally, many proposed projects, such as expansion of transit services, are intended to improve mobility and accessibility and may, as a result, improve community connectivity. However, larger infrastructure projects, such as new above ground rail stations or transit service projects, may require the acquisition of land in existing communities, which may divide established communities. These transportation projects would require subsequent project-level environmental review prior to their implementation. Detailed project design or specific plans could address potential divisions of existing communities. For example, the final plan includes several interchange improvements projects to improve pedestrian/bike connectivity and access across freeways. In addition, as discussed in Section, 3.15 “Transportation,” MTC has a Complete Streets policy under Resolution 4493 (adopted in 2022) requiring that all projects funded with regional funds consider the accommodation of pedestrians, cyclists, and public transit users, and drivers as part of project planning, design, funding, and construction. Compliance with Resolution 4493 would enhance access and connections within existing communities. Through regional programs such as OBAG, MTC and ABAG would continue to support planning efforts for locally sponsored traffic calming and alternative transportation initiatives, such as paths, trails, overcrossings, bicycle plans, that foster improved neighborhoods and community connections. However, MTC and ABAG cannot require local implementing agencies to implement these projects. Project approval would remain subject to the discretion of local agencies. Transportation project impacts related to division of an established community would be potentially significant (PS). (Draft EIR, p. 3.11-21)

B. Implementation of Mitigation Measure LU-1 would reduce the potentially significant impact of division of an established community because it would implement design features that would improve access and

connections within existing communities and to public transit, which would reduce the effects of separation on existing communities. (Draft EIR, p. 3.11-22)

IMPACT

LU-4 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (Draft EIR, p. 3.11-32)

Mitigation Measures

LU-4 Implementing agencies and/or project sponsors shall implement, where feasible and as applicable based on project- and site-specific considerations, the mitigation measures described throughout this EIR to address the effects of displacement that could result in the construction of replacement housing, including:

- Mitigation Measures AES-1 through AES-4
- Mitigation Measures AGF-1 through AGF-3
- Mitigation Measures AQ-2 through AQ-4
- Mitigation Measures BIO-1 through BIO-3 and BIO-5
- Mitigation Measures GHG-1 and GHG-3
- Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4
- Mitigation Measure GEO-7
- Mitigation Measures HAZ-4, HAZ-6 and HAZ-7
- Mitigation Measure LU-1
- Mitigation Measures NOISE-1 through NOISE-4
- Mitigation Measures PSR-1 and PSR-2
- Mitigation Measures PUF-1 through PUF-4
- Mitigation Measure TRA-2

Significance After Mitigation

Implementation of this mitigation measure would reduce the magnitude of potentially significant impacts, as explained in the impact discussions related to each impact and mitigation measure. However, as noted under Impacts AES-1, AES-2, AES-3, AGF-1, AGF-2, AGF-3, AQ-3, AQ-4, GHG-1, GHG-3, CUL/TCR-1, CUL/TCR-2, CUL/TCR-4, HAZ-7, LU-1, NOISE-1, NOISE-2, NOISE-3, NOISE-4, PSR-1, PSR-2, PUF-1, PUF-2, PUF-4, and TRA-2, there would still be instances where the impact remains significant following implementation of mitigation measures. Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. This impact would remain **significant and unavoidable (SU)**.

Finding

Changes or alterations within the responsibility and jurisdiction of MTC or ABAG have been required in, or incorporated into, the project to address this impact to the extent feasible. (Finding (1)). Additionally, changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, However, because site

conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan's housing strategies support accommodation of the region's forecasted 1.5 million new housing units between 2020 and 2050. The housing strategies continue the region's commitment to "focused growth" but are also intended to protect current residents from displacement, preserve existing affordable housing, and produce new housing to secure long-term affordability in order to address the Bay Area's housing crisis . Thus, implementation of the final plan would not result in displacement at the regional scale. (Draft EIR, pp. 3.11-32 to 3.11-34).At the local level, displacement can result in physical effects both directly and indirectly. The potential for direct effects would result from projected growth occurring at the site of existing residential units. Local displacement could include households who are relocating to the proposed Growth Geographies where new housing would be developed under the final plan. However, the final plan accounts for future replacement housing, because it includes strategies to provide sufficient housing to accommodate population and job growth and to provide sufficient housing for all income levels. Thus, any local displacement would be temporary, as additional subsidized affordable housing would be provided pursuant to the plan. Redevelopment of housing sites within the Growth Geographies could result in displacement of current residents and may necessitate construction of replacement housing, resulting in direct impacts. Projected redevelopment and new housing are included in the forecasted development pattern of the final plan. The full impacts from the projected redevelopment and new housing construction would depend on site-specific conditions and project design details that cannot be known at this time. This EIR analyzes potential impacts that may result from this change in the following areas: aesthetics and visual resources, agriculture and forestry resources, air quality, biological resources, climate change, greenhouse gases, and energy, cultural resources and tribal cultural resources, geology, seismicity, and mineral resources, hazards and wildfire, hydrology and water quality, land use, population, and housing, noise, public services and recreation, public utilities and facilities, and transportation. The potential for indirect (or secondary) impacts results from economic factors potentially driving some households to find other housing because of rising rents. When these forces result in housing further from jobs, household commutes may increase, thus affecting air quality, noise, traffic, and GHG emissions. These impacts are analyzed in other sections of this EIR as part of the analysis of overall impacts of the final plan on air quality, noise, traffic, and GHG emissions. The final plan accounts for future replacement housing, because it includes strategies to provide sufficient housing to accommodate population and job growth and to provide sufficient housing for all income levels. The impacts of this growth are addressed throughout this EIR and in some cases has been identified as potentially significant. For this reason, this impact would be potentially significant (PS). (Draft EIR, pp. 3.11-32 to 3.11-34)

B. Actual displacement of homes by sea level rise adaptation projects would depend on site-specific conditions and project design details that cannot be known at this time. This EIR analyzes the potential impacts that may result from replacement of these housing units in the following areas: aesthetics and visual resources, agriculture and forestry resources, air quality, biological resources, climate change, greenhouse gases, and energy, cultural resources and tribal cultural resources, geology, seismicity, and mineral resources, hazards and wildfire, hydrology and water quality, land use, population, and housing, noise, public services and recreation, public utilities and facilities, and transportation. This impact would be potentially significant (PS). (Draft EIR, p. 3.11-35).

C. Transportation projects that require the expansion of existing, or designation of new, rights-of-way have the potential to result in the direct displacement of existing housing that must be removed for infrastructure development. Generally, to minimize environmental impacts and project costs, it is common practice to design the footprint of new transportation projects within existing rights-of-way as much as feasible. This practice is assumed as a part of this analysis. However, development of roadway widening, roadway extension, and transit expansion projects, could result in the disturbance and/or loss

of residential uses. The replacement of these housing units would result in environmental impacts, which are described throughout this EIR for the following potential impact areas: aesthetics and visual resources, agriculture and forestry resources, air quality, biological resources, climate change, greenhouse gases, and energy, cultural resources and tribal cultural resources, geology, seismicity, and mineral resources, hazards and wildfire, hydrology and water quality, land use, population, and housing, noise, public services and recreation, public utilities and facilities, and transportation. This impact would be potentially significant (PS). (Draft EIR, p. 3.11-35).

D. Implementation of Mitigation Measure LU-4 would reduce the magnitude of potentially significant impacts, as explained in the impact discussions related to each impact and mitigation measure. (Draft EIR, p. 3.11-36).

2.4.10 Noise (3.12)

IMPACT

NOISE-1 Generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Draft EIR, p. 3.12-21)

Mitigation Measures

NOISE-1 To reduce construction noise levels to achieve the applicable noise standards of the relevant jurisdiction in the plan area, implementing agencies and project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- Comply with local construction-related noise standards, including restricting construction activities to permitted hours as defined under local jurisdiction regulations.
- Notify residents and occupants within 294 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.
- Designate an on-site construction complaint and enforcement manager for the project.
- Post procedures and phone numbers at the construction site for notifying the implementing agency staff and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.
- Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps). Equipment engine shrouds shall be closed during equipment operation.
- Prohibit the idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.
- Locate all stationary equipment (e.g., generators, compressors, rock crushers, and cement mixers) and staging areas as far as possible from nearby noise-sensitive receptors, or locate such equipment to the extent feasible such that an existing or constructed noise attenuating feature (e.g., temporary noise wall or blanket) blocks the line of sight between affected noise-sensitive receptors and construction staging areas.
- Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from

pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used. External jackets on the tools themselves should be used, if such jackets are commercially available.

- Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.
- For construction activity that would occur within a clear line of sight of an adjacent off-site sensitive receptor (as defined by the local jurisdiction), take place outside of hours during which construction activity is exempt from local noise standards, and exceed applicable construction noise standards or thresholds, the construction contractor shall install temporary sound barriers to attenuate noise, such as temporary noise curtains, sound walls, or similar products that provide a barrier to construction noise. The temporary sound barrier shall be located between the project construction noise sources and receptors to shield the receptors from construction noise. When installed properly, acoustic barriers can reduce construction noise levels by approximately 8–10 dB (EPA 1971). The installation of any temporary sound barrier shall meet all the following criteria:
    - be installed as close as feasible to the boundary of the construction site within the direct line of sight path of the nearby sensitive receptor(s);
    - consist of durable, flexible composite material featuring a noise barrier layer bound to sound-absorptive material on one side; and
    - consist of rugged, impervious material with a surface weight of at least 1 pound per square foot, such that a minimum of 10 dBA reduction is achieved on the receiving side of the sound barrier.

Significance After Mitigation

Implementation of Mitigation Measure NOISE-1 would provide reductions in daytime and nighttime construction noise levels by ensuring proper equipment use, locating equipment away from sensitive land uses, and requiring the use of enclosures, shields, and noise curtains. Implementation of these noise-reduction features would reduce construction noise levels by approximately 10 dBA or more (NCHRP 1999; EPA 1971). To the extent that a local agency requires an individual project to implement all applicable mitigation measures described above, construction noise levels could be reduced by 10 dBA. Greater reductions may be achieved and the frequency and intensity of construction-related noise at nearby receptors may be further reduced, depending on actual construction activities and proximity to receptors. However, there could be cases where noise-level reductions from implementation of mitigation would not be sufficient to reduce noise to an acceptable level. This impact would remain **significant and unavoidable (SU).**

Projects taking advantage of the CEQA streamlining provisions of Senate Bill (SB) 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. Implementation of the final plan's forecasted development pattern would result in construction activities that could result in temporary noise impacts associated with grading, excavating, earthmoving, paving, building or structure construction, and other related activities. Because of the regional scale of the final plan and the programmatic level of this analysis, and because specific development projects have not been proposed, specific construction-related details (e.g., location, schedule, equipment type/number) for individual land use development projects are not available .Therefore, to evaluate potential construction impacts, a representative construction scenario, including typical equipment (e.g., pile driver, cranes, trucks, generators, jackhammers, backhoes), was assumed. According to reference noise levels for these types of construction equipment, construction noise could reach levels of 94.5 dBA Leq and 101.4 dBA Lmax at 50 feet from construction sites. Although other specialized equipment may be used (e.g., for tunnel boring), the modeling scenario includes the simultaneous operation of two of the loudest pieces of construction equipment (i.e., jackhammer and impact pile driver), which would generate similar or louder noise levels compared to other specialized equipment. Thus, modeled construction noise levels are conservatively high.

B. According to the modeling conducted, construction-related noise levels could exceed applicable construction-related noise standards and thresholds, depending on proximity to existing sensitive land uses and duration of construction activities. In addition, although construction noise is short term, it can nonetheless result in substantial increases in noise (e.g., 5+ dBA) in ambient noise levels in the immediate vicinity of a construction site. Therefore, construction-related noise associated with the land use growth forecast could exceed applicable noise thresholds, resulting in a potentially significant (PS) noise impact. (Draft EIR, p. 3.12-22)

C. The final plan includes sea level rise adaptation projects to protect communities in regularly inundated shoreline areas that may be affected by sea level rise. Implementing these sea level rise adaptation projects would result in the construction of various levees, seawalls, elevated roadways, marsh restoration, and tidal gates. Construction of such projects could result in temporary construction noise impacts associated with grading, excavating, earthmoving, and other related activities. The associated noise levels would be like those presented above for construction associated with land use development projects because similar construction equipment would be used. Like construction noise levels associated with forecasted development pattern, temporary noise levels generated by construction of sea level rise adaptation projects could exceed local standards and thresholds identified, depending on proximity to existing sensitive land uses and duration of construction activities. Therefore, implementing the final plan's sea level rise adaptation projects may result in the generation of excessive temporary construction noise levels, which would be potentially significant (PS). (Draft EIR, pp 3.12-23 to 3.12-23)

D. Construction-related noise impacts of transportation projects would depend on the extent of construction being undertaken, proximity to existing sensitive land uses, and applicable noise standards. Nonetheless, construction noise would be of greatest concern to the land uses closest to construction activities. Transportation projects would have the potential for localized noise impacts, particularly when pile driving, or other similar invasive foundation work would be required. (Draft EIR, p. 3.12-23)

E. Proposed transportation projects are spread throughout the Bay Area and are generally limited to existing transportation corridors. In addition, transportation projects typically progress linearly (i.e., along the right-of-way), and nighttime construction is sometimes required to minimize traffic congestion during peak travel periods. Construction activities could affect individual receptors for shorter periods of time because elevated noise levels would only occur temporarily in the location where the construction occurs before moving along the right-of-way. However, such activity could result in greater disturbance to nearby receptors if construction occurs during evening and nighttime hours when residents are generally more susceptible to noise disturbance. Further, transportation construction activities that occur in less urbanized areas, where existing ambient noise levels would be less than in urbanized and

densely populated areas, could result in a greater relative increase in temporary noise levels. High noise levels added to a lower existing ambient noise level result in a greater increase of annoyance than the same high noise level added to an existing high level. To evaluate potential construction impacts, a representative construction scenario, including typical equipment (e.g., pile driver, cranes, trucks, generators, jackhammers, backhoes) was assumed. Based on reference noise levels for these types of construction equipment, construction noise could reach levels of 94.5 dBA Leq and 101.4 dBA Lmax at 50 feet from future proposed construction sites. Construction-related noise levels could exceed Caltrans-recommended levels of 86 dBA Lmax, would likely exceed FTA-recommended daytime (i.e., 90 dBA Leq) and nighttime (i.e., 80 dBA Leq) noise standards for residential receptors within approximately 84 feet (daytime) and 265 feet (nighttime) of construction activity, respectively., and could exceed local construction-related noise standards and thresholds identified, depending on proximity to existing land uses and duration of construction activities. Therefore, construction-related noise associated with the land use growth forecast could exceed applicable noise thresholds, resulting in a potentially significant (PS) noise impact. (Draft EIR, pp. 3.12-22 to 3.12-23).

F. Implementation of Mitigation Measure NOISE-1 would provide reductions in daytime and nighttime construction noise levels by ensuring proper equipment use, locating equipment away from sensitive land uses, and requiring the use of enclosures, shields, and noise curtains. (Draft EIR, p 3.12-25)

IMPACT

NOISE-2 Generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies (Draft EIR, p. 3.12-25)

Mitigation Measures

NOISE-2(a) To reduce exposure from traffic noise when significant and to achieve the applicable noise thresholds for each roadway type (i.e., 70 dBA CNEL for major roads/freeways, 65 dBA CNEL for all other roads, or as otherwise defined in applicable local noise standards), implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations to achieve noise levels in accordance with applicable local noise standards. Measures shall include those identified below (or other equally effective measures):

- Design adjustments to proposed roadway or transit alignments to reduce noise levels in noise-sensitive areas (e.g., below-grade roadway alignments can effectively reduce noise levels in nearby areas by providing a barrier between the source and receptor).
- Use techniques such as landscaped berms, reduced-noise paving materials, and traffic-calming measures in the design of transportation projects.
- Use rubberized asphalt or “quiet pavement” to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned.
- Maximize the distance between existing noise-sensitive land uses and new noise-generating facilities and transportation systems.
- Contribute to the insulation of buildings or construction of noise barriers around sensitive receptor properties adjacent to the transportation project.
- Use land use planning measures, such as zoning, restrictions on development, site design, and buffers, to ensure that future development is noise compatible with adjacent transportation facilities and land uses.

- Monitor the effectiveness of noise-reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

NOISE-2(b) To reduce the exposure of existing sensitive receptors to non-transportation noise associated with the forecasted development pattern, implementing agencies and/or project sponsors shall, for projects with features that generate stationary noise that are near sensitive receptors, implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- Local agencies approving land use projects shall require that routine testing and preventive maintenance of emergency electrical generators be conducted during the less sensitive daytime hours (per the applicable local municipal code). Electrical generators or other mechanical equipment shall be equipped with noise control (e.g., muffler) devices in accordance with manufacturers' specifications.
- Maximize the distance between noise-sensitive land uses and new noise-generating facilities.
- Improve the acoustical insulation, window quality, and/or other soundproofing of dwelling units (existing or proposed) where setbacks do not sufficiently reduce noise.
- Local agencies approving land use projects shall require that external mechanical equipment, including HVAC units, associated with buildings and other stationary sources (e.g., commercial loading docks) incorporate features designed to reduce noise to below 70 dBA CNEL or the local applicable noise standard. These features may include locating equipment or activity areas in equipment rooms or enclosures that incorporate noise-reduction features, such as acoustical louvers and exhaust and intake silencers. Enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors. Site design considerations shall also incorporate appropriate setback distances, to the extent practical, from the noise and existing sensitive receptors to minimize noise exposure.

NOISE-2(c) To reduce transit-related noise exposure to existing receptors within 50 feet of a rail transit line to below 70 dBA CNEL, or other applicable standard, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- When finalizing development project site plans or transportation project design, sufficient setback between occupied structures and the railroad tracks shall be provided to minimize noise exposure to the extent feasible.
- When finalizing development project site plans, noise-sensitive outdoor use areas shall be sited as far away from adjacent noise sources as possible, and site plans shall be designed to shield noise-sensitive spaces with buildings or noise barriers whenever possible.
- Prior to project approval, the implementing agency for a transportation project shall ensure that the transportation project sponsor applies the following mitigation measures (or other technologically feasible measures) to achieve a site-specific exterior noise level of 70 dBA CNEL (or other applicable local noise standard) and interior noise level of 45 dBA CNEL at sensitive land uses, as applicable for transit projects:
    - use sound reduction barriers, such as landscaped berms and dense plantings;
    - locate rail extension below grade as feasible;
    - use damped wheels on railway cars;
    - use vehicle skirts;
    - use undercar acoustically absorptive material; and

- install sound insulation treatments for affected structures.

Significance After Mitigation

Implementation of Mitigation Measure NOISE-2(a) would result in substantial reductions in traffic-related noise. Depending on barrier construction, a 10 dBA in noise reduction is typically feasible (FHWA 2006), which would be adequate to bring the highest modeled traffic noise levels of 76.2 dBA CNEL to below the 70-dBA CNEL threshold. Site design, including proximity to the noise source, can achieve varying degrees of noise reduction depending on the distance to the source. Building construction methods can typically achieve a minimum of 25 dB exterior-to-interior noise reduction, but much higher levels of reduction are achievable through additional wall insulation and soundproofing techniques. Implementation of Mitigation Measure NOISE-2(b) would require operational measures so that stationary noise sources would be designed to reduce noise to below 70 dBA CNEL and comply with any applicable local noise codes. Implementation of Mitigation Measure NOISE-2(c) would ensure that site-specific planning would include all technologically feasible measures to reduce transit noise to below 70 dBA CNEL for exterior noise levels and 45 dBA CNEL for interior noise levels. Further, site planning and building construction would be developed to achieve the necessary noise reduction based on site-specific parameters. To the extent that a local agency requires an individual project to implement all feasible and as applicable mitigation measures described above, the impact would be less than significant with mitigation (LTS-M).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Findings

A. Land use related traffic noise impacts were assessed at the county level and based on baseline (2023) and buildout (2050) modeled traffic volumes by roadway types, including all on-road vehicles and buses. Changes in land use due to forecasted growth would generate new trips, and these trips would be distributed on existing and potentially expanded roadways. Due to the anticipated growth for the region, an absolute increase in roadway volumes within the Plan area is anticipated, despite more efficient land uses and transportation projects and strategies. The final plan would result in traffic-noise levels that exceed applicable noise thresholds and would result in a substantial noise increase in some areas. Therefore, this impact would be potentially significant (PS). (Draft EIR, pp. 3.12-26 to 3.12-27)

B. The final plan's forecasted development pattern would result in new residential, commercial, and industrial land uses that could include new stationary sources (e.g., HVAC units, mechanical equipment) and generate increased levels of community noise. Implementation of the final plan would result in increased land use development within areas already experiencing high noise levels. Although specific locations for these noise sources are currently unknown, considering the projected high density of land development in already urbanized areas, where existing sensitive receptors already exist, implementation of the final plan's forecasted development pattern (and associated stationary noise

sources) could result in the exposure of existing sensitive receptors to exterior noise levels that exceed applicable local thresholds or result in a substantial increase in noise (e.g., 1.5 dB). Therefore, this impact would be potentially significant (PS). (Draft EIR, pp. 3.12-27 to 3.12-28)

C. Increases in transit-related noise as a result of the final plan could occur throughout the region as transit lines are expanded and service frequency increased. Transit line expansion and expanded service frequency included under the final plan could result in increased transit-related noise throughout the region. The effects of increased noise levels would vary greatly depending on the type of transit facility and proximity to existing sensitive land uses. The severity of this impact would depend upon the type (diesel or electric powered) and frequency of rail pass-by events, and the existing ambient noise level at the existing receptor. These projects are generally located in urban areas that are already exposed to high levels of vehicle traffic noise.

D. New transit lines or the expansion of existing transit lines would result in a new substantial noise source that could result in excessive noise exposure depending on the type of existing land uses and proximity to the new noise sources. New rail lines would likely have noise levels similar to those discussed above. Therefore, they could exceed applicable exterior (i.e., 70 dBA CNEL) and interior (i.e., 45 dBA CNEL) noise thresholds at existing sensitive land uses. In addition, because new or expanded rail lines could result in noise levels of 70 dBA CNEL and up to 82 dBA CNEL, when compared to existing conditions where no rail currently exists, noise levels would substantially increase (i.e., likely more than 3 dBA above ambient levels). Implementing agencies or sponsors of transportation projects would coordinate with local jurisdictions to comply with local policies and regulations. In addition to future project-level CEQA review, transportation projects subject to review by the Federal Transit Administration, Federal Railroad Administration, or the Federal Highway Administration would be subject to project-level NEPA review and compliance with applicable guidance related to noise assessments and mitigation.

E. Because trains could generate noise levels of up to 82 dBA CNEL/ Ldn, and transit lines are currently located in urbanized areas near major roads and freeways where noise levels are currently relatively high, a 1.5-dBA increase in transit noise would be considered significant. As explained in Impact TRA-1 in Section 3.15, "Transportation," the final plan includes major investments that create new transit lines or boost frequencies on existing lines. Thus, it is expected that implementation of the final plan would result in a 1.5-dBA or more increase in transit noise. Increases in transit noise on existing facilities would result in a potentially significant (PS) impact. (Draft EIR, p. 3.12-29)

F. Implementation of Mitigation Measure NOISE-2(a) would result in substantial reductions in traffic-related noise. Depending on barrier construction, a10 dBA in noise reduction is typically feasible (FHWA 2006), which would be adequate to bring the highest modeled traffic noise levels of 76.2 dBA CNEL to below the 70-dBA CNEL threshold. Site design, including proximity to the noise source, can achieve varying degrees of noise reduction depending on the distance to the source. Building construction methods can typically achieve a minimum of 25-dB exterior-to-interior noise reduction, but much higher levels of reduction are achievable through additional wall insulation and sound-proofing techniques. Implementation of Mitigation Measure NOISE-2(b) would require operational measures so that stationary noise sources would be designed to reduce noise to below 70 dBA CNEL and comply with any applicable local noise codes. Implementation of Mitigation Measure NOISE-2(c) would ensure that site-specific planning would include all technologically feasible measures to reduce transit noise to below 70 dBA CNEL for exterior noise levels and 45 dBA CNEL for interior noise levels. (Draft EIR, p. 3.12-32)

IMPACT

NOISE-3 Generate excessive groundborne vibration or groundborne noise levels (Draft EIR, p. 3.12-32)

Mitigation Measures

NOISE-3(a) To reduce construction vibration levels to acceptable levels (i.e., 65 VdB to 80 VdB depending on the frequency of the event and 0.1 to 0.6 PPV in/sec depending on building type), implementing agencies

and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures):

- To minimize disturbance of receptors within 545 feet of pile-driving activities, implement "quiet" pile-driving technology (such as predrilling of piles and the use of more than one pile driver to shorten the total pile-driving duration), where feasible and as applicable, in consideration of geotechnical and structural requirements and conditions.
- To reduce structural damage, where pile driving is proposed within 55 feet of an existing structure, engage a qualified geotechnical engineer and qualified historic preservation professional (for designated historic buildings only) and/or structural engineer to conduct a preconstruction assessment of existing subsurface conditions and the structural integrity of nearby (i.e., within 55 feet) structures that would be exposed to pile-driving activity. If recommended by the preconstruction assessment, for structures or facilities within 55 feet of pile-driving activities, the project sponsors shall require ground vibration monitoring of nearby structures. Such methods and technologies shall be based on the specific conditions at the construction site. Conditions will be determined through activities such as the preconstruction surveying of potentially affected structures and underpinning of foundations of potentially affected structures, as necessary. The preconstruction assessment shall include a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for building damage. In the event of unacceptable ground movement with the potential to cause structural damage, all impact work shall cease, and corrective measures shall be implemented to minimize the risk to the subject, or adjacent, structure.
- Use cushion blocks to dampen impact noise from pile driving.
- Restrict high-impact construction activities (i.e., vibratory activities that generate 0.20 in/sec PPV or more at 25 feet) within 545 feet of sensitive receptors to permitted hours in accordance with local jurisdiction regulations.

NOISE-3(b) To reduce vibration effects from rail operations, implementing agencies and/or project sponsors shall undertake a detailed evaluation of vibration and groundborne noise impacts and identify project-specific mitigation measures as necessary to reduce vibration to a level that complies with applicable local standards or FTA standards. To minimize the effects of vibration and groundborne noise from rail operations, the following measures (or other equally effective measures) shall be implemented where feasible and as applicable based on project- and site-specific considerations:

- Ensure that project sponsors apply the following measures to achieve FTA-recommended vibration levels of 72 VdB at residential land uses, or other applicable standard, for rail extension projects:
    - Use high-resilience (soft) direct fixation fasteners for embedded track.
    - Install ballast mat, or other approved technology for the purpose of reducing vibration, for ballast and tie track.
    - Conduct regular rail maintenance, including rail grinding and wheel truing to recontour wheels, to provide smooth running surfaces.
    - Maximize the distance between tracks and sensitive uses.
    - Implement operational changes, such as limiting train speed and reducing nighttime operations.

Significance After Mitigation

Implementation of Mitigation Measure NOISE-3(a) would reduce vibration impacts by requiring the use of quieter pile-driving technology and ensuring that the proper actions are taken to minimize vibration impacts

to adjacent structures. Implementation of the Mitigation Measure NOISE-3(b) would minimize vibration and groundborne noise associated with new and expanded rail systems and operations through vibration control measures for track support (e.g., resilient fasteners, ballast mats) (FTA 2018). To the extent that a lead agency requires an individual project to implement all applicable mitigation measures described above, the impact would be less than significant with mitigation (LTS-M).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. Construction activities associated with the projected growth forecasted by the plan may result in varying degrees of temporary ground vibration, depending on the specific type and number of construction equipment used and construction activities involved (e.g., excavation, earthmoving).When considering new construction, pile driving generates the highest vibration levels and is, therefore, of greatest concern when evaluating construction-related vibration impacts. The potential exists for pile driving to occur within 55 feet of an existing building, exceeding Caltrans-recommended levels for structural damage, and within 545 feet of an existing sensitive land use, exceeding FTA-recommended levels for vibration annoyance. Therefore, this would be a potentially significant (PS) vibration impact. (Draft EIR, pp. 3.12-32 to 3.12-33)

B. Construction-related vibration impacts from transportation project implementation would be similar to those described above for land use and sea level rise adaptation infrastructure. This would be a potentially significant (PS) vibration impact. (Draft EIR, p. 3.12-34)

C. Increases in transit-related vibration as a result of the final plan could occur throughout the region as transit lines are expanded and service frequency increased but would occur primarily in urbanized areas and near existing transit facilities. Vibration levels would vary greatly depending on the type of transit facility and proximity to existing sensitive land uses. The degree of increased vibration exposure would depend upon the type (diesel or electric powered) and frequency of rail pass-by events and the existing soil conditions at the existing receptor. Extension of rail transit service to new locations, as well as increases in existing transit frequency could result in vibration levels that exceed vibration significance thresholds. Expanding or building new transit lines in unserved areas would result in a new substantial vibration source that could result in vibration effects that exceed FTA-recommended levels (i.e., 72 VdB) within 200 feet of the source. In addition, because new or expanded rail lines could result in vibration levels that exceed applicable criteria (i.e., 72 VdB) within 200 feet, when compared to existing conditions where no rail currently exists, vibration levels would substantially increase (i.e., more than 1.5 VdB). Some of the rail extension projects identified above would expose existing sensitive receptors along extended transit alignments to excessive vibration and permanent substantial increases in vibration levels. Therefore, this would be a potentially significant (PS) impact. (Draft EIR, pp. 3.12-33 to 3.12-35)

D. Implementation of Mitigation Measure NOISE-3(a) would reduce construction vibration impacts by requiring the use of quieter pile-driving technology and ensuring that the proper actions are taken to minimize vibration impacts to adjacent structures. Implementation of the Mitigation Measure NOISE-3(b) would minimize vibration and groundborne noise associated with new and expanded rail systems and operations through vibration control measures for track support (e.g., resilient fasteners, ballast mats) (FTA 2018). (Draft EIR, p. 3.12-36)

IMPACT

NOISE-4 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels (Draft EIR, p. 3.12-37)

Mitigation Measures

NOISE-4 Local lead agencies for all new development proposed to be located within an existing airport influence zone, as defined by the locally adopted ALUCP or local general plan, shall require a site-specific noise compatibility study. The study shall consider and evaluate existing aircraft noise, based on specific aircraft activity data for the airport in question, and shall include recommendations for site design and building construction to ensure compliance with interior noise levels of 45 dBA CNEL, such that the potential for sleep disturbance is minimized.

Significance After Mitigation

To the extent that a local agency requires an individual project to implement, where applicable, the mitigation measure described above, the appropriate design and building construction would ensure interior noise levels of 45 dBA CNEL, and this impact would be less than significant with mitigation (LTS-M).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be significant and unavoidable (SU) for purposes of this program-level review.

Finding

Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Finding

A. Noise from airports and aircraft flight events have the greatest effect on nearby land uses. Most airports and airfields immediately adjacent to TPAs identified in the final plan have an active Airport Land Use Compatibility Plan (ALUCP) (or the equivalent) to discourage incompatible land uses within the vicinity of the airport. Many local jurisdictions' general plans include land use compatibility standards that designate acceptable levels of noise exposure based on the type of development. However, given the regional scale of the final plan and the high level of projected development throughout the region, it is possible that the Plan's forecasted land use development pattern could result in exposure of sensitive receptors to exterior and interior noise levels from existing airports or airstrips that exceed applicable

thresholds. There would be a potentially significant (PS) impact resulting from excessive airport noise levels if projected development were to occur in close proximity to existing airports or airstrips that would require mitigation. (Draft EIR, pp. 3.12-37 to 3.12-38)

B. Implementation of Mitigation Measure NOISE-4 would require preparation of a site-specific noise compatibility study for projects within an existing airport influence zone that includes recommendations for site design and building construction to ensure compliance with interior noise levels of 45 dBA CNEL to minimize potential for sleep disturbance. (Draft EIR, p. 3.12-38)

2.4.11 Public Services and Recreation (3.13)

IMPACT

PSR-1 Result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities (Draft EIR, p. 3.13-11)

Mitigation Measures

PSR-1 Implementing agencies and/or project sponsors shall implement the following measure, where feasible and as applicable based on project- and site-specific considerations:

- For projects that could increase demand for public services facilities, implementing agencies and/or project sponsors shall coordinate with relevant service providers to ensure that the existing public services could accommodate the increase in demand. If existing facilities are found to be inadequate to maintain adequate capital capacity, equipment, personnel, and/or response times, facility improvements for the appropriate public service shall be identified in each project's CEQA documentation. Implementing agencies and/or project sponsors shall implement, where feasible and necessary, the mitigation measures described throughout this EIR to address the environmental effects related to the construction of new or expanded public service facilities:
    - Mitigation Measures AES-1 through AES-4
    - Mitigation Measures AGF-1 through AGF-3
    - Mitigation Measures AQ-2 through AQ-4
    - Mitigation Measures BIO-1 through BIO-3 and BIO-5
    - Mitigation Measures GHG-1 and GHG-3
    - Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4
    - Mitigation Measure GEO-7
    - Mitigation Measures HAZ-4, HAZ-6 and HAZ-7
    - Mitigation Measures LU-1and LU-4
    - Mitigation Measures NOISE-1 through Noise-4
    - Mitigation Measures PSR-2
    - Mitigation Measures PUF-1 through PUF-4
    - Mitigation Measure TRA-2

Significance After Mitigation

To the extent that an individual project adopts and implements Mitigation Measure PSR-1 described above, the severity of the impact would be reduced. Mitigation Measure PSR-1 would reduce the severity of impacts

from construction of new or expanded facilities because it would include implementation of measures to offset the impacts of construction of new or physically altered facilities. However, the measures would not reduce this impact to a less-than-significant level, as discussed in the appropriate sections of this EIR. Therefore, this impact would be **significant and unavoidable (SU)**.

Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. The regional growth forecast for the Bay Area projects that between 2020 and 2050 the region will support an additional 1.8 million residents and 1.4 million jobs, resulting in 1 million new households. The final plan designates Growth Geographies and identifies a set of land use approaches to accommodate the projected growth that would result in focused housing and job growth concentrated primarily in or adjacent to already developed areas and along existing transit corridors. The final plan was designed to accommodate the people, households, and jobs identified in the regional growth forecast. The overall growth would result in increased demand for services. As the number of households grows, demand for schools and other general government services and facilities (e.g., schools, police, fire, and libraries) would increase. Increases in residential and nonresidential land uses would also increase the number of service calls for emergency services and police and fire protection. The final plan forecasts the general location of future land uses, and future residential densities and building intensities in the region consistent with the final plan beyond the horizon year of most local general plans in the Plan Area (2050). The regional growth forecast could result in increases in demand for public services that exceed existing service capabilities. To meet increased demand for these facilities, existing facilities could require additional personnel and equipment to maintain adequate service levels. In some cases, it would be necessary to construct new facilities or modify existing facilities to maintain adequate capital capacity, equipment, and personnel. Because MTC and ABAG do not have land use authority to adopt local land use plans or approve local land use development projects, land use development projects are ultimately controlled by local jurisdictions throughout the Plan area. Future land use development projects would be required to undergo an evaluation of their contribution to demand on public services prior to approval. In cases where a project results in increased demand, many jurisdictions require developers to pay impact fees to fund increased demand for public services; however, the amount and extent to which a project must mitigate additional demand would differ on a project-by-project basis depending on size and location and would be the responsibility of the implementing agency/project applicant.

B. In cases where the final plan's forecasted development pattern results in the need for new facilities to meet increased demand, short-term construction impacts could occur on a project-by-project basis. Environmental review would be conducted by the appropriate lead agency, and mitigation would be incorporated as needed. For the purposes of this analysis, it is assumed that the construction of new or

modified public service facilities resulting from the implementation of the final plan could result in adverse environmental effects; however, there is inherent uncertainty surrounding the location and size of future facilities. Therefore, impacts related to new or expanded school, police, fire, emergency medical, and other government service facilities would be potentially significant (PS). (Draft EIR, pp. 3.13-11 to 3.13-13)

C. Mitigation Measure PSR-1 would reduce the severity of impacts from construction of new or expanded facilities because it would include implementation of measures to offset the impacts of construction of new or physically altered facilities. (Draft EIR, pp. 3.13-14 to 3.13-15)

IMPACT

PSR-2 Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment (Draft EIR, p. 3.13-15)

Mitigation Measures

PSR-2 Implementing agencies and/or project sponsors shall implement, where feasible and as applicable, the mitigation measures described throughout this EIR to address the environmental effects related to the construction of new or expanded recreational facilities:

- Mitigation Measures AES-1 through AES-4
- Mitigation Measures AGF-1 through AGF-3
- Mitigation Measures AQ-2 through AQ-4
- Mitigation Measures BIO-1 through BIO-3 and BIO-5
- Mitigation Measures GHG-1 and GHG-3
- Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4
- Mitigation Measure GEO-7
- Mitigation Measures HAZ-4, HAZ-6 and HAZ-7
- Mitigation Measures LU-1 and LU-4
- Mitigation Measures NOISE-1 through Noise-4
- Mitigation Measures PSR-1
- Mitigation Measures PUF-1 through PUF-4
- Mitigation Measure TRA-2

Significance After Mitigation

Implementation of Mitigation Measure PSR-2 would reduce the severity of impacts from construction of new or expanded facilities because it would include implementation of measures to offset the impacts of construction of new or physically altered facilities. However, the measures would not reduce this impact to a less-than-significant level, as discussed in the appropriate sections of this EIR. Therefore, this impact would be **significant and unavoidable (SU)**.

Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measure, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Findings

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. Implementation of the final plan would increase the number of residents making use of existing parkland and could cause accelerated physical deterioration of parks, trails, and recreational facilities as a result. The final plan's environmental strategies encourage future Bay Area development focused within existing developed areas, ringed by natural lands that are well-maintained and dotted with parks and trails that provide easy access to open space. Support for locally adopted land use policies that limit new construction outside of the existing footprint, combined with investments in natural lands that serve vital ecological purposes and parks and recreation facilities essential to population health and wellbeing are included, with a specific emphasis on improving access to parks and open space and promoting a sustainable development pattern.

B. The final plan also includes strategies to protect open space lands and concentrate development within already developed areas. Specifically, Strategy EN4, "Maintain Urban Growth Boundaries" directs new growth to be located within the region's existing urban footprint or growth boundaries. This strategy would confine new development within areas of existing development and areas that are suitable for growth, as established by local jurisdictions. Strategy EN5, "Protect and Manage High-Value Conservation Lands" would provide funds to help protect and conserve high-priority natural and working lands that support recreation opportunities, biodiversity, natural resources, and priority conservation areas. Implementation of Strategies EN4 and EN5 would protect existing recreation resources located within high-priority agricultural and open space lands. Further, Strategy EN6, "Expand Urban Greening in Communities" would expand recreation opportunities through funding quality parks, trails, tree canopy, and urban greening in communities. The timing, siting, and project-specific details of individual development projects would dictate the necessity of increasing recreational services in existing service areas or expanding service to new areas. While land use development could increase demand on recreational services, existing State requirements regarding development of a complete general plan, including Open Space and Conservation Elements, require local jurisdictions to address impacts on recreational facilities. Thus, land use development under the final plan would not have a significant impact on recreational resources.

C. However, implementation of the final plan could result in impacts related to the construction or expansion of recreation facilities. As noted above for impact PSR-1, construction may cause adverse short-term traffic impacts or short-term air quality and noise impacts associated with the use of heavy-duty equipment. If construction occurs on previously undeveloped land, it could have additional impacts including increased stormwater runoff, loss of habitat, or damage to cultural/tribal cultural resources. Thus, this impact would be potentially significant (PS). (Draft EIR, pp. 3.15-16 to 3.13-16)

D. Implementation of Mitigation Measure PSR-2 would reduce the severity of impacts from construction of new or expanded facilities because it would include implementation of measures to offset the impacts of construction of new or physically altered facilities. (Draft EIR, pp. 3.13-15 to 3.13-18)

2.4.12 Public Utilities and Facilities (3.14)

IMPACT

PUF-1 Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects (Draft EIR, p. 3.14-35)

Mitigation Measures

PUF-1(a) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- For projects that could increase demand on water and wastewater treatment facilities, coordinate with the relevant service provider to ensure that the existing public services and utilities could accommodate the increase in demand. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.

PUF-1(b) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- During the design and CEQA review of individual future projects, determine whether sufficient stormwater drainage facilities exist for a proposed project. These CEQA determinations must ensure that the proposed development can be served by its existing or planned drainage capacity. If adequate stormwater drainage facilities do not exist, project sponsors shall coordinate with the appropriate utility and service provider to ensure that adequate facilities could accommodate the increased demand, and if not, infrastructure and facility improvements shall be identified in each project's CEQA determination. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.
- For projects of greater than 1 acre in size, reduce stormwater runoff caused by construction by implementing stormwater control best practices, based on those required for a SWPPP.
- Model and implement a stormwater management plan or site design that prevents the post-development peak discharge rate and quantity from exceeding pre-development rates.

PUF-1(c) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):

- For transportation projects, incorporate stormwater control, retention, and infiltration features, such as detention basins, bioswales, vegetated median strips, and permeable paving, early into the design process to ensure that adequate acreage and elevation contours are planned.

PUF-1(d) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below, (or equally effective measures):

- For transportation projects implemented by Caltrans or subject to Caltrans review, adhere to Caltrans' Stormwater Management Plan, which includes best practices to reduce the volume of stormwater runoff and pollutants in the design, construction, and maintenance of highway facilities.

PUF-1(e) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below or equally effective measures):

- Consider the use of on site electric generation and storage systems that produce all or a portion of the energy used by a land use, sea level rise adaptation, or transportation project.

PUF-1(f) Implementing agencies and/or project sponsors shall implement, where feasible and as applicable based on project- and site-specific considerations, the mitigation measures described throughout this EIR to address the effects related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, including:

- Mitigation Measures AES-1 through AES-4
- Mitigation Measures AGF-1 through AGF-3
- Mitigation Measures AQ-2 through AQ-4
- Mitigation Measures BIO-1 through BIO-3 and BIO-5
- Mitigation Measures GHG-1 and GHG-3
- Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4
- Mitigation Measure GEO-7
- Mitigation Measures HAZ-4, HAZ-6 and HAZ-7
- Mitigation Measures LU-1
- Mitigation Measures NOISE-1 through NOISE-4
- Mitigation Measures PSR-1 and PSR-2
- Mitigation Measures PUF-2 through PUF-4
- Mitigation Measure TRA-2

Significance After Mitigation

Implementation of Mitigation Measure PUF-1(a) would reduce impacts associated with exceeding existing water and wastewater treatment capacity because application of such mitigation would require that land use and transportation projects comply with project-level CEQA review and identify infrastructure improvements to ensure adequate capacity. Implementation of Mitigation Measures PUF-1(b), PUF-1(c), and PUF-1(d) would reduce impacts associated with exceedances of existing stormwater drainage capacity because application of such mitigation would require that land use, sea level rise adaptation, and transportation projects comply with project-level CEQA review, incorporate on-site stormwater control practices, and develop and implement stormwater management plans or stormwater control design features. Additionally, as stated above, implementation of Mitigation Measures PUF-2(a), PUF-2(b), and PUF-2(c), summarized under Impact PUF-2, and Mitigation Measure PUF-3, summarized under Impact PUF-3, would lower water demand and wastewater generation, thus reducing the potential need for facilities. Implementation of Mitigation Measure PUF-1(f) would mitigate impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities and to conversion of undeveloped land to accommodate new or expanded facilities. Projects taking advantage of the CEQA streamlining provisions of SB 375 (Public Resources Code PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, it cannot be concluded with

certainty that all impacts related to this potential construction and land conversion would be mitigated to less than significant. Therefore, there may be instances where the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities would cause **significant and unavoidable (SU)** environmental effects.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. The proposed plan's forecasted development land use growth footprint could result in a need for new or expanded stormwater drainage, water, wastewater treatment facilities, electric power, natural gas, and telecommunications infrastructure to accommodate demand that exceeds the capacity at existing facilities. Where existing electric, natural gas, and telecommunications infrastructure cannot accommodate demand generated from increased land development associated with implementation of the final plan, and where the capacity of existing infrastructure is exceeded, new or expanded infrastructure, including electric power, natural gas, and telecommunications may be required. Therefore, this impact would be potentially significant (PS). (Draft EIR, pp. 3.14-36 to 3.14-37)

C. Construction of sea-level rise adaptation infrastructure could have an effect on water treatment demand or wastewater treatment. Construction of sea-level rise adaptation infrastructure would not generate wastewater such that new or expanded facilities would be required. Construction of some "grey" engineered infrastructure like sea walls or levees with roadways or trails on their top surface could increase construction-related wastewater runoff or expand the extent of impervious surfaces. While it is not anticipated that sea level rise adaptation infrastructure would have an effect on wastewater treatment demand or water treatment demand, any increase in the extent of impermeable surfaces could increase stormwater runoff during construction. .

D. Moreover, it may be necessary to relocate existing electrical, natural gas, and telecommunications infrastructure if such facilities are located within the vicinity of sea level rise adaptation infrastructure. Environmental impacts could occur from both construction and the potential conversion of undeveloped land to accommodate relocated water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities. This would be a potentially significant impact (PS). (Draft EIR, pp. 3.14-37 to 3.14-38)

E. The electrification of the transportation fleet as well as the increased use of communication systems for transportation could result in the need for new or realigned electric and telecommunication infrastructure. It may be necessary to relocate existing electrical, natural gas, and telecommunications infrastructure if such facilities are located within the vicinity of a transportation project. Environmental

impacts could occur from both construction and the potential conversion of undeveloped land to accommodate new or relocated electrical, natural gas, and telecommunications infrastructure. While existing regulations applying to transportation projects would minimize stormwater-related effects, the more stringent and effective Caltrans NPDES Stormwater Regulations only apply to some transportation projects under the purview of Caltrans. In locations where new lane-miles are added and existing drainage capacity is limited, expanded systems may still be necessary. As a result, the potential stormwater capacity impacts related to transportation improvements from implementation of the final plan would be potentially significant (PS). (Draft EIR, 3.14-39)

F. Implementation of Mitigation Measure PUF-1(a) would reduce impacts associated with exceeding existing water and wastewater treatment capacity because application of such mitigation would require that land use and transportation projects comply with project-level CEQA review and identify infrastructure improvements to ensure adequate capacity. Implementation of Mitigation Measures PUF-1(b), and PUF-1(c), and PUF-1(d) would reduce impacts associated with exceedances of existing stormwater drainage capacity because application of such mitigation would require that land use, sea level rise, and transportation projects comply with project-level CEQA review, incorporate on-site stormwater control practices, and develop and implement stormwater management plans or stormwater control design features. Mitigation Measure PUF-1(e) would require consideration the use of on site electric generation and storage systems that produce all or a portion of the energy used by a land use, sea level rise adaptation, or transportation project. Implementation of Mitigation Measure PUF-1(f) would mitigate impacts related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities and to conversion of undeveloped land to accommodate new or expanded facilities. (Draft EIR pp. 3.14-41 to 3.14-42)

IMPACT

PUF-2 Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years (Draft EIR, p. 3.14-42)

Mitigation Measures

PUF-2(a) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- For projects that could increase demand for water, coordinate with the relevant water service provider to ensure that the provider has adequate supplies to accommodate the increase in demand. This can and should be documented in the form of an SB 610 Water Supply Assessment, where applicable; an SB 221 Water Supply Verification; or other capacity analysis.
- Implement water conservation measures which result in reduced demand for potable water. This could include reducing the use of potable water for landscape irrigation (such as through drought-tolerant plantings, water-efficient irrigation systems, the capture and use of rainwater) and the use of water-conserving fixtures (such as dual-flush toilets, waterless urinals, reduced flow faucets).
- Coordinate with the water provider to identify an appropriate water consumption budget for the size and type of project and designing and operating the project accordingly.
- For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.

- Where applicable, apply Tier 1 or Tier 2 CALGreen standards as mandatory local requirements, which reduce water use by 12% and 20%, respectively, and require additional qualifying elective actions.

PUF-2(b) Implementing agencies and/or project sponsors shall require the construction phase of transportation projects to connect to reclaimed water distribution systems for non-potable water needs, when feasible based on project- and site-specific considerations.

PUF-2(c) Implementing agencies and/or project sponsors shall require transportation projects with landscaping to use drought-resistant plantings or connect to reclaimed water distribution systems for irrigation and other non-potable water needs when available and feasible based on project- and site-specific considerations.

Significance After Mitigation

Implementation of Mitigation Measures PUF-2(a), PUF-2(b), and PUF-2(c) would reduce impacts associated with water supply because they would require that land use, sea level rise adaptation, and transportation project sponsors coordinate with water suppliers to ensure adequate water supplies exist or comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use. Projects taking advantage of the CEQA streamlining provisions of SB 375 (Public Resources Code PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, it cannot be concluded with certainty that all impacts related to water supply would be mitigated to a less-than-significant. Therefore, this impact would remain **significant and unavoidable (SU)**.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Under the final plan, growth would be concentrated in established urban areas that already have existing development and are served by established water providers. These providers have long-range planning documents, such as UWMPs, that account for projected demand under normal, dry, and multiple dry year scenarios. First, implementation of the final plan's development pattern would help protect the region's water quality by limiting growth in local watersheds that drain into supply sources. Second, by focusing development, per capita water use is likely to be less because of a greater share of multifamily housing and modern water efficiency standards for new construction and development, such as reduced areas of intensive water needs, such as lawns. Additionally, by showing the effects of concentrating future growth in already developed areas, the final plan demonstrates the benefits of existing water

supply infrastructure and demonstrates how to reduce the need for new water infrastructure to be developed to service new areas.

C. Finally, although the region's population grew by approximately 23 percent between 1986 and 2007, total water use increased by less than 1 percent during that same period (Draft EIR, Figure 3.14-4). In other words, per capita water use has substantially declined in the region over the last quarter century. This was accomplished in part from continued implementation of water conservation and reuse and recycling programs by local water agencies and municipalities, including those associated with the California Water Conservation Act of 2009, which called for a 20-percent reduction in per capita water use by 2020, and Assembly Bill (AB) 1668 and SB 606, which laid out a long-term water conservation framework. 45 of the 46 2020 UWMPs tracked by MTC and ABAG, which represent 89 percent of the regional population, had achieved the 20 percent reduction target. Combined, when weighting districts by service population, these 46 water districts achieved a 30 percent reduction between 2010 and 2020. Strategy EN-2 in the final plan seeks to improve existing indoor and outdoor water efficiency measures to continue to reduce water demand for existing developments.

D. Major water suppliers in the region are projected to be able to supply adequate water for their projected service populations through 2040 during normal years, apart from Solano County Water Agency which expects to meet water demand projections up to 2020 but has not analyzed beyond that horizon. The ability to provide adequate water supply for many districts is dependent on successful achievement of water conservation targets and the completion of supply expansion projects, such as new water contracts, land acquisition, groundwater recharge, and reclaimed water distribution. Water suppliers are pursuing the water conservation targets set by the State under SB X7-7 (2009) and regularly updating their UWMPs. Future development projects would be required to comply with Water Code Sections 10910–10915, as described above in the Regulatory Setting, under "Water Supply Assessment and Water Supply Verification." The enforcement of these regulations by local jurisdictions would ensure that a water supply assessment is prepared to demonstrate that sufficient water would be available to serve development projects before their approval.

E. With implementation of the final plan, land use development would not occur evenly around the region; therefore, the final plan could result in population or job growth beyond what is assumed in current UWMPs and could result in a localized water supply shortage. California, including the plan area, may face future water supply challenges associated with climate change-related periods of drought. The uncertainty of water supply availability is furthered by the plan's 2050 horizon being 5 to 15 years further than water agencies' 2015 and 2020 UWMPs, which have a planning horizon of 2035 or 2045. The increase in population-, household-, and jobs-related demand on water supply coupled with potentially reoccurring drought conditions may result in insufficient water supply to serve the plan area. For these reasons, these impacts would be potentially significant (PS). (Draft EIR, pp. 3.14-42 to 3.14-43)

F. The construction and maintenance of sea level rise adaptation infrastructure could increase the demand for water. Construction activities such as dust control and operational activities such as landscape irrigation could increase water demand. Although these increases in demand are anticipated to be small on a per project basis, the collective demand from all the projects taken together could increase water demand that exceeds an applicable water supply agency's projected demand and supply. Because sea level rise adaptation infrastructure constructed under the final plan may be in areas with constrained water supplies, especially during a dry year or extended drought period, these impacts would be potentially significant (PS). (Draft EIR, p. 3.14-43)

G. The construction of new roadway capacity, bicycle and pedestrian facilities, transit facilities; maintenance of existing transportation facilities; and operation of new and existing facilities could increase water demand for construction activities such as concrete mixing or dust control and operational activities such as landscape irrigation, and restrooms, and drinking fountains. The individual water demands associated with transportation projects are small, and the combined regional volume is negligible compared to the overall municipal demand. Construction and operational activities (e.g., dust

control and landscape irrigation) associated with the transportation projects could also use non-potable waters supplies, which could reduce the demand for potable-water. Because transportation projects under the final plan may be constructed in locations with constrained water supplies, especially during a dry year or prolonged drought period, these impacts would be potentially significant (PS). (Draft EIR, p. 3.14-43)

H. Implementation of Mitigation Measures PUF-2(a), PUF-2(b), and PUF-2(c) would reduce impacts associated with water supply because they would require that land use, sea level rise, and transportation project sponsors coordinate with water suppliers to ensure adequate water supplies exist or comply with project-level CEQA review and incorporate on-site water conservation strategies, water budgeting, and incorporation of recycled water for non-potable use. (Draft EIR, p. 3.14-45)

IMPACT

PUF-3 Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments (Draft EIR, p. 3.14-45)

Mitigation Measures

PUF-3 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- During the design and CEQA review of individual future projects, determine whether sufficient wastewater treatment capacity exists for a proposed project. These CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.
- Require compliance with Mitigation Measure PUF-2(a), and MTC shall require implementation of Mitigation Measures PUF-2(b) and PUF-2(c), as feasible based on project- and site-specific considerations to reduce water usage and, subsequently, some wastewater flows.

Significance After Mitigation

Implementation of Mitigation Measure PUF-3 would reduce impacts related to exceedance of existing wastewater capacity because application of this mitigation would require that land use projects comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use as mandated by Mitigation Measures PUF-2(b), PUF-2(c), and PUF-3 listed above, which would reduce the generation of wastewater. To the extent that an implementing agency requires an individual project to implement all feasible mitigation measures described above, the impact would be less than significant with mitigation (LTS-M).

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, MTC and ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, MTC and ABAG cannot require local implementing agencies to adopt the identified mitigation measures. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. final plan strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. Increased volumes of wastewater from forecasted growth under the final plan could exceed the wastewater treatment capacity of individual treatment facilities, if not properly planned. Generation of additional wastewater as a result of forecasted development would depend on the location of planned development and would not be spread evenly across each treatment facility system. Generally, capacity planning is undertaken in advance of need. Building occupancy is prohibited if wastewater service is not available. Therefore, exceedance of the capacity of a wastewater treatment plant is not expected.

C. Wastewater generation per capita would be expected to decrease by 2050 as compared to baseline conditions because of implementation of regional- and Statewide water conservation measures. Also, wastewater generation per capita will likely be reduced in future years as municipalities in the Bay Area adopt new versions of Part 11 of the Title 24 California Building Code (California Green Building Standards or CALGreen) which will require new development to incorporate low-flow, water-efficient appliances, and design. However, it is likely that some treatment facilities would need to expand their capacity before 2050 to meet expected population growth, or to respond to RWQCB requirements to provide capacity to receive their NDPES permit. Because the changes to the land use pattern under the final plan may result in insufficient wastewater treatment capacity, these impacts would be potentially significant (PS). (Draft EIR, pp. 3.14-45 to 3.14-46)

D. Implementation of Mitigation Measure PUF-3 would reduce impacts related to exceedance of existing wastewater capacity because application of this mitigation would require that land use projects comply with project-level CEQA review and incorporate on-site water conservation approaches, water budgeting, and incorporation of recycled water for non-potable use as mandated by Mitigation Measures PUF-2(b), PUF-2(c), and PUF-3 listed above, which would reduce the generation of wastewater. (Draft EIR, p 3.14-47)

IMPACT

PUF-4 Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with federal, State, and local management and reduction statutes and regulations related to solid waste (Draft EIR, p. 3.14-47)

Mitigation Measures

PUF-4 Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below:

- Provide an easily accessible area that is dedicated to the collection and storage of non-hazardous recycling materials.
- Maintain or reuse existing building structures and materials during building renovations and redevelopment.
- Use salvaged, refurbished, or reused materials to help divert such items from landfills.
- Divert construction waste from landfills, where feasible, through means such as:
    - submitting and implementing a construction waste management plan that identifies materials to be diverted from disposal;
    - establishing diversion targets, possibly with different targets for different types and scales of development; and
    - helping developments share information on available materials with one another, to aid in the transfer and use of salvaged materials.
- Apply the specifications developed by the Construction Materials Recycling Association (CMRA) to assist contractors and developers in diverting materials from construction and demolition projects, where feasible (CalRecycle 2006).

Significance After Mitigation

Implementation of Mitigation Measure PUF-4 would reduce impacts associated with solid waste generation because it would require that land use and transportation projects apply landfill diversion approaches including re-using building materials, maintaining structures where applicable, developing construction waste management plans, and using guidance from CMRA. Projects taking advantage of the CEQA streamlining provisions of SB 375 (Public Resources Code PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. However, it cannot be concluded with certainty that all impacts related to solid waste would be mitigated to a less-than-significant level. Therefore, this impact would remain **significant and unavoidable (SU)**.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (Finding (1)). Changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which would avoid or substantially lessen the significant environmental effect, as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions to reduce impacts. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Findings

A. The majority of projected development in the final plan would occur on existing urban land, thereby minimizing impacts. The final plan's designated growth geographies in combination with the designation of PCAs help focus future household and job growth into existing communities well served by the transportation network, as well as communities with well-resourced schools and easy access to jobs, parks, and other amenities. This core strategy is known as the "focused growth" strategy. final plan

strategies, including H03, H06, H08, EC04, EC05, EC06, EN04, and EN05, help protect natural lands and farmlands and reduce overall land consumption.

B. The existing population and employment uses in the region will continue to generate solid waste that requires disposal in a licensed and regulated landfill. The expected growth in the region's population, which is expected to increase by 1.8 million from 7.8 million in 2020 to roughly 9.6 million by 2050, under the final plan, which would result in an increase in solid waste production. All but five (i.e., Altamont Landfill and Resource Recovery, Vasco Road Sanitary Landfill, Redwood Landfill, USS-Poscoe Industries Waste Management Unit II, and Kirby Canyon Recycling and Disposal Facility) of the fourteen landfills active in the region have an estimated closure date before the year 2050 (CalRecycle 2024a). It is unlikely these three remaining landfills, which make up around 35% of the region's existing remaining capacity, could accommodate the solid waste disposal needs of the entire region. While there are regulations in place intended to reduce solid waste in California, implementation of the final plan's concentrated growth could generate waste that could exceed the current permitted capacity at local landfills. Therefore, this impact would be potentially significant (PS). (Draft EIR, pp. 3.14-48 to 3.14-49)

C. Sea level rise adaptation infrastructure construction and maintenance in the final plan have the potential to generate a substantial amount of solid waste during construction. This waste can come from typical construction activities, such as grading, excavation, and removal of existing structures. The amount of this waste is difficult to predict, but it could result in an exceedance of local landfill capacities closer to expected closure dates of the landfills. This impact would be potentially significant (PS). (Draft EIR, p. 3.14-49)

D. Roadway and transit construction and maintenance projects in the final plan have the potential to generate a substantial amount of solid waste during construction. This waste can come from typical construction activities, such as grading, excavation, and removal of existing structures. The operation of transportation facilities may also generate solid waste. The amount of this waste is difficult to predict, but it could result in an exceedance of local landfill capacities for transportation projects constructed in the future closer to expected closure dates of the landfills. Transportation projects under the proposed plan would be required to comply with AB 341 and SB 1383, as well as the additional laws cited above which would further reduce anticipated solid waste generation. Nevertheless, construction of these projects would still generate a notable volume of solid waste that could exceed the capacity of local landfills. Thus, these impacts would be potentially significant (PS). (Draft EIR, p. 3.14-49)

E. Implementation of Mitigation Measure PUF-4 would reduce impacts associated with solid waste generation because it would require that land use, sea level rise adaptation, and transportation projects apply landfill diversion strategies including re-using building materials, maintaining structures where applicable, developing construction waste management plans, and using guidance from CMRA. (Draft EIR, p. 3.14-50)

2.4.13 Transportation (3.15)

IMPACT

TRA-2 Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) (Draft EIR, p. 3.15-22)

Mitigation Measures

TRA-2(a) MTC shall work with State and local agencies to ensure implementation of components of the plan that will help to reduce regional VMT, particularly projects that improve or expand transit service, as well as bicycle and pedestrian facilities. These transportation projects, in conjunction with land use policies included in the plan, will help the region to achieve the projected decreases in regional VMT per capita and achieve the region's SB 375 targets for GHG emissions. MTC will collaborate with State and other agencies to explore the feasibility of new programs for reducing VMT, such as VMT fees, banks, and exchanges.

TRA-2(b) Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, consistent with MTC's "Key SB 743 Implementation Steps for Land Use Projects" that consist of but are not limited to those identified below (or equally effective measures):

- TDM strategies shall be incorporated into individual land use and transportation projects and plans, as part of the planning process. These TDM measures are strategies not included in EN9, rather they are measures that could and should be implemented by the local agency based on land use authority that neither MTC nor ABAG has. Local agencies shall incorporate strategies identified in the Federal Highway Administration's (FHWA's) publication: *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included, as applicable, to encourage use of transit and nonmotorized modes of transportation and reduce VMT on the region's roadways:
    - include TDM mitigation requirements for new developments;
    - incorporate supporting infrastructure for nonmotorized modes, such as bike lanes, secure bike parking, sidewalks, and crosswalks;
    - provide incentives to use alternative modes and reduce driving, such as universal transit passes, road and parking pricing;
    - implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools;
    - develop TDM-specific performance measures to evaluate project-specific and system-wide performance;
    - incorporate TDM performance measures in the decision-making process for identifying transportation investments;
    - implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and
    - set aside funding for TDM initiatives.

TRA-2(c) Implementing agencies and/or project sponsors shall implement the following measure, where applicable and necessary based on project- and site-specific considerations (or equally effective measures):

- Implement Mitigation Measure GHG-3.

Significance After Mitigation

The ability to close the gap between the SB 375 targets and the reductions needed to meet State GHG goals linked to transportation is tied to local jurisdictions and their ability to meet VMT targets in compliance with thresholds set pursuant to CEQA Guidelines Section 15064(3)(b). There is no assurance that implementation of the proposed mitigation measures would be enough to achieve the regional reductions needed to attain the statewide 2050 targets. Additional regulatory action that results in substantial GHG reductions throughout all sectors of the State economy and based on State-adopted regulations would likely be needed to attain such goals, and they are beyond the feasible reach of MTC and ABAG and local jurisdictions.

Projects taking advantage of the CEQA streamlining provisions of SB 375 (PRC Sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as applicable, to address site-specific conditions. The implementing agency would ensure that TDM measures are incorporated into projects to the extent feasible. Implementation of the mitigation measure at a project-level would encourage sustainable modes of transportation and reduce the potential for the proposed plan to increase VMT on the regional transportation network. However, MTC and ABAG cannot require local implementing agencies to adopt the

above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. In addition, the State has indicated that additional State policy actions and funding would be required to close the VMT gap between what the MPOs could achieve through implementation of their SCSs and reductions needed to meet State goals. Therefore, this impact would be **significant and unavoidable (SU)** for purposes of this program-level review.

Finding

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR. (CEQA Guidelines, Section 15091(a)(1).) (Finding (1)). Additionally, changes or alterations within the responsibility and jurisdiction of another public agency and not MTC or ABAG can and should be adopted by such other agency, which avoid or substantially lessen the significant environmental effect as identified in the final EIR (Finding (2)). Projects taking advantage of CEQA streamlining provisions of SB 375 (PRC sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures to address site-specific conditions. However, because site conditions are unique, it cannot be concluded with certainty that all significant impacts could be avoided. (Finding (3)).

Facts in Support of Finding

A. The final plan is designed to reduce GHG emissions pursuant to SB 375, through designated growth geographies and complementary land use (e.g., H03, E04, E05), transportation (e.g., T03, T04, T05, T08, T09, T10, T11, T12), and environmental strategies (i.e., EN07, EN08, EN09).

B. Overall, the impact of the final plan would result in an increase in total regional VMT and a decrease in regional per capita VMT between the base year (2023) and 2050, as shown in Table 2-10 of Chapter 2, "Project Description." Implementation of the final plan would result in a 6 percent decrease in VMT per capita in 2050 than in 2023.

C. If implemented, the final plan's comprehensive suite of transportation, housing, economic and environmental strategies, including Strategies H03, EC04, EC05, T03, T04, T05, T08, T09, EN07, and EN09, would result in regional per-capita VMT reductions and would not impede achievement of additional statewide VMT reductions required to meet the State's statutory GHG emission targets.

D. The ability to facilitate further reductions in per capita VMT relies on local jurisdictions as they review and entitle individual land use and transportation projects. The Technical Advisory states that "at present, consistency with RTP/SCSs does not necessarily lead to a less-than-significant VMT impact" because of the gap in the SB 375 targets and the GHG reductions necessary to achieve the statewide goals (LCI 2018). Because there is a gap between the GHG emissions reductions that can be achieved from targets established by CARB under to SB 375 and the reductions needed to achieve statewide GHG reduction goals, and because the ability to bridge this gap depends on additional State-led VMT reduction strategies (CARB 2022) and on implementation of land use, TDM, and other strategies that can only be employed at the local jurisdictional level, MTC and ABAG cannot conclude that the reductions would be sufficient to meet the State's climate goals. Therefore, Impact TRA-2 would be potentially significant (PS). (Draft EIR, p. 3.15-28)

E. Mitigation Measures TRA-2a, TRA-2b, and TRA-2c would reduce impacts by ensuring implementation of projects that will reduce VMT and by requiring TDM strategies be incorporated into individual land use plans. (Draft EIR p. 3.15-30)

2.5 FINDINGS REGARDING TRIBAL CULTURAL RESOURCES AND NATIVE AMERICAN COORDINATION

Pursuant to Public Resources Code Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American Tribe, begin consultation before the release of an environmental impact report, negative declaration, or mitigated negative declaration. These provisions were enacted by Assembly Bill (AB) 52, signed by Governor Edmund G. Brown, Jr., in September of 2014, and established a new class of resources under CEQA: "tribal cultural resources," which are either eligible for listing on the national, state, or local register of historic resources; or a resource that the lead agency determines, in its discretion and supported by substantial evidence, to treat as a tribal cultural resource pursuant to the criteria in Public Resources Code Section 5024.1(c). That section provides that a resource meets the criteria for listing as an historic resource in the CRHR if it meets any of the following:

Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.

Is associated with the lives of persons important in our past.

Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.

Has yielded, or may be likely to yield, information important in prehistory or history.

AB 52 applies to those projects for which a lead agency had issued a Notice of Preparation (NOP) of an EIR or notice of intent to adopt a negative declaration or mitigated negative declaration on or after July 1, 2015. The NOP for the plan was issued on January 14, 2025. Therefore, the requirements of AB 52 apply, and MTC and ABAG formally notified both the federally-recognized Tribes and the California Native American Tribes identified by the Native American Heritage Commission in a letter dated August 4, 2023, about the opportunity for consultation pursuant to Public Resources Code (PRC) Section 21080.3.1. Correspondence in compliance with AB 52 is summarized in Table 3.7-2 of the Draft EIR.

AB 52 CONSULTATION

On August 4, 2023, MTC and ABAG sent letters to 101 Native American tribal representatives in compliance with AB 52. Only the Federated Indians of Graton Rancheria (Graton Rancheria) requested consultation pursuant to Public Resources Code (PRC) Section 21080.3.1. There was an exchange to schedule an initial meeting; however, a consultation meeting was not scheduled. A last request to identify an agreed-upon date and time was sent by MTC-ABAG staff via email on January 2, 2024. MTC-ABAG staff did not receive a response.

EIR NOTIFICATION

In addition to AB 52 consultation, MTC and ABAG sent a copy of the Notice of Preparation to the tribes listed below on January 22, 2025, as well as to the Bureau of Indian Affairs, the California Native American Heritage Commission, the National Indian Justice Center, and River Rock Casino. MTC and ABAG received no tribal response.

Amah Mutsun Tribal Band	Lytton Rancheria Band of Pomo Indians
Amah Mutsun Tribal Band of Mission San Juan Bautista	Middletown Rancheria of Pomo Indians
Big Valley Rancheria/Big Valley Band of Pomo Indians	Mishewal-Wappo Tribe of Alexander Valley
Cachil Dehe Band of Wintun Indians of the Colusa Indian Community	Muwekma Ohlone Indian Tribe of the SF Bay Area
	North Valley Yokuts Tribe

Cloverdale Rancheria of Pomo Indians of California	Pinoleville Pomo Nation
Coastanoan Rumsen Carmel Tribe	Potter Valley Rancheria
Coyote Valley Band of Pomo Indians	Redwood Valley Rancheria
Dry Creek Rancheria Band of Pomo Indians	Robinson Rancheria of Pomo Indians
Federated Indians of Graton Rancheria	Scotts Valley Band of Pomo Indians
Guidiville Rancheria	The Confederated Villages of Lisjan
Indian Canyon Mutsun Band of Costanoan	The Ohlone Indian Tribe
Ione Band of Miwok Indians	Torres Martinez Desert Cahuilla Indians
Kashia Band of Pomo Indians of the Stewarts Point Rancheria	United Auburn Indian Community of the Auburn Rancheria
Kletsel Dehe Band of Wintun Indians	Wilton Rancheria
Koi Nation of Northern California	Yocha Dehe Wintun Nation

Furthermore, upon release of the Draft EIR, MTC and ABAG sent a copy of the **Notice of Availability** to the tribes listed below on October 20, 2025, as well as to the Bureau of Indian Affairs, the California Native American Heritage Commission, the National Indian Justice Center, and River Rock Casino. MTC and ABAG received no tribal response.

Amah Mutsun Tribal Band	Lytton Rancheria Band of Pomo Indians
Amah Mutsun Tribal Band of Mission San Juan Bautista	Middletown Rancheria of Pomo Indians
Big Valley Rancheria/Big Valley Band of Pomo Indians	Mishewal-Wappo Tribe of Alexander Valley
Cachil Dehe Band of Wintun Indians of the Colusa Indian Community	Muwekma Ohlone Indian Tribe of the SF Bay Area
Cloverdale Rancheria of Pomo Indians of California	North Valley Yokuts Tribe
Coastanoan Rumsen Carmel Tribe	Pinoleville Pomo Nation
Coyote Valley Band of Pomo Indians	Potter Valley Rancheria
Dry Creek Rancheria Band of Pomo Indians	Redwood Valley Rancheria
Federated Indians of Graton Rancheria	Robinson Rancheria of Pomo Indians
Guidiville Rancheria	Scotts Valley Band of Pomo Indians
Indian Canyon Mutsun Band of Costanoan	The Confederated Villages of Lisjan
Ione Band of Miwok Indians	The Ohlone Indian Tribe
Kashia Band of Pomo Indians of the Stewarts Point Rancheria	Torres Martinez Desert Cahuilla Indians
Kletsel Dehe Band of Wintun Indians	United Auburn Indian Community of the Auburn Rancheria
Koi Nation of Northern California	Wilton Rancheria
	Yocha Dehe Wintun Nation

Finding

The Commission and Board hereby find that the actions taken, as described above, fully comply with the requirements of AB 52 as set forth in the Public Resources Code, and that MTC and ABAG have met their obligation for tribal consultation.

2.6 FINDINGS REGARDING GROWTH INDUCEMENT

CEQA requires a discussion of the ways in which a project could be growth inducing. CEQA also requires a discussion of ways in which a project may remove obstacles to growth, as well as ways in which a project may set a precedent for future growth. CEQA Guidelines Section 15126.2(d) identifies a project as growth inducing if it fosters economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. New employees from commercial and industrial development and new population from residential development represent direct forms of growth. These direct forms of growth have a secondary effect of expanding the size of local markets and inducing additional economic activity in the area. Examples of development that would indirectly facilitate or accommodate growth include the installation of new roadways or the construction or expansion of water delivery/treatment facilities.

The CEQA Guidelines are clear that, while an analysis of growth-inducing effects is required, it should not be assumed that induced growth is necessarily significant or adverse. The analysis in the Draft EIR examines the potential growth-inducing impacts related to adoption and implementation of the final plan. (See Draft EIR, pp. 5-6 to 5-9.)

In summary, the proposed plan includes 35 integrated strategies to enable the Bay Area to accommodate future growth and progress toward ensuring the Bay Area is affordable, connected, diverse, healthy and vibrant for all. This growth is not under the authority or control of MTC or ABAG. As dictated by existing State law, it will occur in a manner substantially consistent with local general plans and other applicable requirements. Overall, the proposed plan accommodates the regional growth forecast in a manner that is more efficient and effective from a regional perspective, and consistent with SB 375.

The proposed plan accounts for growth likely to occur through 2050 and makes assumptions about location and design that promote regional environmental benefits. The proposed plan's housing needs forecast accounts for growth for all economic segments of the population and assumes no net increase in the in-commute from outside the region as required by SB 375. While the effects of growth inducement can be considered an adverse impact under CEQA, the proposed plan accommodates projected growth and implements State mandates to integrate land use and transportation decision-making in a way that achieves improved environmental and social outcomes. As discussed above, the proposed plan would be growth-accommodating, not growth-inducing, and it reflects the regulatory mandate to house the forecasted population. At the regional and Statewide level, the proposed plan's policies help prevent sprawl and make growth in existing centers more equitable and more efficient. Under the proposed plan, GHG emissions and other environmental impacts would be lessened relative to what may otherwise occur absent of the regional strategies embodied in the proposed plan.

2.7 FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE CHANGES

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by the proposed project.

As discussed in the Draft EIR, while use of nonrenewable energy and fuel; conversion of agriculture, open space, and habitat; release of pollutants emissions into the atmosphere; and climate change effects are in and of themselves generally irreversible resource commitments, the fact that the proposed plan changes (slows) the rate of use of these resources is a beneficial outcome. Overall, implementation of the proposed plan would commit existing and future generations to a more efficient use of nonrenewable resources than under presently planned conditions.(See Draft EIR pages 5-1 through 5-2.

Irretrievable commitments of non-renewable resources associated with the projected change in land use, and with the sea level rise adaptation projects and transportation projects in the proposed plan, would include those described below. The following issues are addressed in various sections of Chapter 3 of the Draft EIR, as noted:

consumption of significant amounts of nonrenewable energy for construction, maintenance, and operation of new development, sea level rise adaptation projects, or transportation projects (addressed in Section 3.6, “Climate Change, Greenhouse Gases, and Energy”);

use of building materials, fossil fuels, and other resources for construction, maintenance, and operation of new development, sea level rise adaptation projects footprint, or transportation projects (addressed in Section 3.6, “Climate Change, Greenhouse Gases, and Energy”);

conversion of some resource lands, such as agricultural land, habitat areas, and other undeveloped lands into developed land, sea level rise adaptation projects footprint, or transportation uses (addressed in several sections, including Section 3.3, “Agriculture and Forestry Resources”; Section 3.6, “Climate Change, Greenhouse Gases, and Energy”; and Section 3.5, “Biological Resources”);

degradation of ambient air quality through the increase of harmful particulate matter caused by a cumulative increase in vehicle exhaust (addressed in Section 3.4, “Air Quality”); and

emission of GHGs that would contribute to global climate change (addressed in Section 3.6, “Climate Change, Greenhouse Gases, and Energy”).

2.8 FINDINGS REGARDING MITIGATION MEASURES, ACTIONS, AND PROGRAMS PROPOSED BY COMMENTERS

Comments on the Draft EIR did not suggest additional mitigation measures and/or modifications to the measures recommended in the Draft EIR. However, some comments suggested actions or programs that were not necessarily presented as mitigation measures but could be interpreted as such because they propose specific actions that could be taken as part of plan implementation. In considering specific recommendations from commenters, MTC and ABAG have been cognizant of the legal obligation under CEQA to substantially lessen or avoid significant environmental effects to the extent feasible. It is recognized that comments frequently offer thoughtful suggestions regarding how a commenter believes that a particular mitigation measure can be modified, or perhaps changed significantly, in order to more effectively, in the commenter’s eyes, reduce the severity of environmental effects. The Commission and Board are also cognizant, however, that the mitigation measures recommended in the EIR represent the professional judgment and long experience of the MTC and ABAG expert staff and environmental consultants. It is thus the position of the Commissioners and Board that the measures should not be altered without considerable thought and compelling analysis. Thus, in considering any suggested changes or additions to the mitigation measures as set forth in the EIR, MTC and ABAG, in determining whether to accept such suggestions, either in whole or in part, consider the following factors, among others: (i) whether the suggestion relates to an environmental impact that can already be mitigated to less than significant levels by proposed mitigation measures in the Draft EIR; (ii) whether the proposed language represents a clear improvement, from an environmental standpoint, over the draft language that a commenter seeks to replace; (iii) whether the

proposed language is sufficiently clear as to be easily understood by those who will implement the mitigation as finally adopted; (iv) whether the language might be too inflexible to allow for pragmatic implementation; (v) whether the suggestions are feasible from an economic, technical, legal, or other standpoint; and (vi) whether the proposed language is consistent with the project objectives.

MTC and ABAG find that the responses to comments included in the Final EIR have adequately responded to each new action and program suggested by commenters. As is evident from the specific responses given in the Final EIR to each suggestion, MTC and ABAG have spent a considerable amount of time carefully considering and weighing proposed actions and programs. In response, MTC and ABAG developed alternative language addressing the same issue that was of concern to a commenter or explained why changes to the EIR were not required to address the concerns of the commenter. In no instance, however, did MTC and ABAG fail to take seriously a suggestion made by a commenter or fail to appreciate the sincere effort that went into the formulation of suggestions. The Commission and Board find that the responses to comments in the Final EIR are supported by substantial evidence and that the Final EIR provides adequate and appropriate responses to all comments on the Draft EIR, including all comments proposing actions and programs. The Commission and Board, therefore, incorporate those responses into these findings.

2.9 FINDINGS AND FACTS IN SUPPORT OF FINDINGS FOR ALTERNATIVES

Public Resources Code Section 21002 provides that "public agencies should not approve projects as proposed if there are feasible alternatives ... which would substantially lessen the significant environmental effects of such projects." CEQA requires an EIR to consider a reasonable range of alternatives to a proposed project or to the location of the proposed project which would "feasibly attain most of the basic objectives of the project" (CEQA Guidelines, Section 15126.6(a)). Section 15126.6, subdivision (f) of the CEQA Guidelines limits the alternatives that must be considered in the EIR to those "that would avoid or substantially lessen any of the significant effects of the project."

This Section describes how MTC and ABAG developed the range of alternatives analyzed in the EIR, summarizes the final plan's potentially significant and unavoidable impacts, discusses the project objectives including SB 375's mandates to achieve the region's GHG emission targets and identify areas within the region sufficient to house all economic segments the population, and considers the merits and feasibility of each of the alternatives.

2.9.1 Range of Alternatives

As stated above, section 15126.6(a) of the Guidelines requires EIRs to describe "... a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. (See also CEQA Guidelines Section 15126.6[f].) This section of the CEQA Guidelines also provides guidance regarding what the alternatives analysis should consider. The Guidelines require that an EIR include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the project. If an alternative would cause one or more significant effects in addition to those that would be caused by the

project, the significant effects of the alternative must be discussed, but in less detail than the significant effects of the project as proposed (CEQA Guidelines Section 15126.6[d]). The Guidelines further require that the "no project" alternative be considered (CEQA Guidelines Section 15126.6[e]).

In determining the range of alternatives that should be considered in an EIR, it is important to consider the objectives of the project, the project's significant effects, and unique project considerations. These factors are crucial to the development of alternatives that meet the criteria specified in Section 15126.6(a). Although EIRs must contain a discussion of "potentially feasible" alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by the lead agency's decision-making body—here, the MTC Commissioners and ABAG Executive Board. (See PRC Sections 21081.5, 21081[a] [3].)

As discussed in Chapter 1.0, "Introduction," MTC and ABAG conducted a multiyear plan development process that began with public engagement before advancing into the Blueprint phase. Engagement focused on gaining insights on the pandemic's impact on Bay Area residents and sought to identify shifts in priorities and concerns, while the Blueprint phase developed the draft of the proposed plan. The Final Blueprint's 35 strategies were designed to help the Bay Area accommodate future growth while advancing the region's vision for 2050—ensuring it becomes more affordable, connected, diverse, healthy and vibrant for all.

On January 14, 2025, in accordance with the CEQA Guidelines, MTC and ABAG filed the Notice of Preparation of the EIR for Plan Bay Area 2050+. The purpose of the Notice of Preparation was to seek comments about the scope and content of the EIR, including solicitating feedback on EIR alternatives that should be evaluated. On Wednesday, January 19, 2025, MTC and ABAG conducted an online public scoping meeting. At this meeting, a presentation by MTC and ABAG staff provided an overview of the proposed plan, the CEQA process, and key environmental issues identified in the Notice of Preparation. No oral or written comments were received during the meeting. Comments pertaining to plan alternatives received during the scoping period were considered during development of the proposed plan and plan alternatives. (See Section 4.2, "Alternatives Considered but Not Evaluated Further.")

The previously considered alternatives and adopted Plan Bay Area plans also helped inform and refine the alternatives considered in this EIR (see Section 4.1.3, "Previous Versions of Plan Bay Area and Alternatives"). In advancing the considerations of alternatives, any alternative must attain the underlying purpose of the plan, including accommodating forecasted growth through 2050, as well as attaining most of the plan's objectives (see Section 4.7, "Ability to Meet Project Objectives").

The Draft EIR evaluates the plan and three alternatives. Each of the alternatives is constrained by the same planning assumptions as the final plan, maintains the same regional growth forecasts—population, employment, households, and housing units, and maintains the same forecast of reasonably available revenues for transportation, affordable housing, and environmental resilience to ensure the alternatives represent a range of feasible alternatives and the analysis provided an "apples to apples" comparison with the final plan.

The three alternatives recommended for analysis in the Draft EIR are briefly described below. A full description of each alternative is provided in Draft EIR, Chapter 4, "Alternatives to the final plan."

No Project Alternative. An EIR must analyze the "no project alternative." (CEQA Guidelines, §15126.6(e).) The purpose of the no project alternative is to allow a comparison of the environmental impacts of approving the proposed project with the effects of not approving it. (Id., § 15126.6(e)(1).) The no project alternative must discuss the existing conditions, "as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." (Id., § 15126.6(e)(2).)

The No Project Alternative represents a realistic scenario for what would occur if Plan Bay Area 2050+ is not adopted, as compared to a no project alternative that would include continuation of Plan Bay Area 2050. Without an approved plan, future growth would be consistent with local general plans and zoning. It assumes no new regionally significant transportation projects or sea level rise adaptation projects beyond those currently under construction or those that have both full funding and environmental clearance ("committed"). If Plan Bay Area 2050+ is not adopted, the region would lose the ability to move forward with most new transportation projects, since federal funding could not be committed without an approved plan. While basic safety and maintenance projects could continue, regionally significant projects from the previous plan that are not yet fully funded would be placed on hold. Without the ability to direct future investments, the region would also lose momentum to support focused growth in communities. Housing growth would be more dispersed, while job growth would be somewhat more concentrated in San Francisco and the northern Bay Area. Compared to the proposed plan, this alternative would result in higher household growth primarily in Contra Costa, Napa, and Santa Clara Counties, and higher job growth in San Francisco, Alameda, Contra Costa, Marin, Napa, and Sonoma Counties.

Alternative 1 – No New Highway and Transit Reinvestment Alternative retains the housing, economy, and environment strategies included in the proposed plan. Under this alternative, modifications are limited to the plan's transportation strategies, specifically through the removal of regionally significant roadway expansion and extension projects under Strategies T6, T7, T8, and T11. These projects include general purpose freeway lanes, auxiliary lanes, high-occupancy vehicle (HOV) lanes, express lanes, major interchange improvements involving auxiliary lanes, and principal arterial expansions. Funding previously allocated to these roadway projects would instead be redirected to support increased transit service across Bay Area transit operators. This alternative prioritizes transit-focused investments to create a more connected and affordable Bay Area. By shifting from highway expansion to improved transit, it enhances access to opportunity, reduces reliance on automobile travel, and lowers greenhouse gas emissions—supporting a healthy environment. While maintaining the proposed plan's land use framework, this alternative positions transit as the core of regional mobility, helping to foster a more diverse and vibrant region where all residents can thrive.

Alternative 2 – TOC Growth Focus Alternative retains all strategies in the proposed plan, including those related to transportation, housing, the economy, and the environment. However, unlike the proposed plan, which applies its housing and economy strategies across a broad range of Growth Geographies (see Chapter 2, "Project Description"), this alternative would focus application of these strategies primarily within TOC Policy Areas, thus increasing development capacity in areas close to major transit infrastructure. TOC Policy Areas are defined in MTC Resolution No. 4530 as the areas within a half-mile radius surrounding existing and planned fixed-guideway transit stations—including regional rail, commuter rail, light rail, bus rapid transit, and ferry terminals—based on proximity to transit rather than the designation given by local jurisdictions. By focusing application of housing and economy strategies in TOC Policy Areas, this alternative targets the plan's growth-supportive land use and economic development efforts in areas most directly served by major transit infrastructure. Additionally, this alternative seeks to improve the effectiveness of existing and planned transit services, reduce reliance on automobile travel, and encourage more compact, walkable, and transit-supportive communities. These changes support a connected and healthy Bay Area by lowering GHG emissions and improving access to reliable transportation, while also fostering diverse and vibrant communities where more residents can live near high-quality transit.

The alternatives to the proposed plan are designed to accommodate the same households and jobs projections, consistent with statutory requirements. The proposed plan alternatives, described in Draft EIR Chapter 4, "Alternatives to the Proposed Plan," are defined by their transportation, housing, economy, and environment strategies, which influence the respective forecasted development patterns, transportation investment, and sea level rise adaptation for each alternative.

An alternative that reduces household or job projections relative to the proposed plan to reduce significant and unavoidable impacts would not be consistent with requirements for the regional growth forecast. CEQA requires EIRs to only consider alternatives that are feasible. (14 Cal. Code Regs. Section 15126.6(a); 15126.6(f)(1). The term "feasible" is defined to mean "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (14 Cal. Code Regs. Section 15364.) On this basis, MTC and ABAG may appropriately determine that an alternative is infeasible if it would conflict with applicable regulatory limitations and reject it from further consideration. (*Bay Area Citizens v. Association of Bay Area Governments* (2016) 248 Cal.App.4th 966, 1018-1019 [EIR for regional transportation plan not required to consider alternative that did not comply with the requirements of SB 375 or CARB].)

Further, an alternative that reduces household growth would be inconsistent with plan objectives stated in the Draft EIR to house 100 percent of the region's projected growth by income level, and with no increase in in-commuters over the final plan baseline year (Draft EIR, p. 2-3). The concept of "feasibility" also encompasses the question of whether a particular alternative promotes the underlying goals and objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1506-1509 [court upholds CEQA findings rejecting alternatives in reliance on applicant's project objectives]; see also *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1001 ["an alternative 'may be found infeasible on the ground it is inconsistent with the project objectives as long as the finding is supported by substantial evidence in the record'"]; *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1165, 1166 "a lead agency may structure its EIR alternative analysis around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"].) Moreover, "'feasibility' under CEQA encompasses 'desirability' to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, legal, and technological factors." (*City of Del Mar*, *supra*, 133 Cal.App.3d at p. 417; see also *California Native Plant Society*, *supra*, 177 Cal.App.4th at p. 1001 ["an alternative that 'is impractical or undesirable from a policy standpoint' may be rejected as infeasible"].) Thus, an alternative that did not house 100 percent of the region's projected growth would be infeasible for failing to meet one of the basic plan objectives.

The Commission and Board find that the EIR analyzed a reasonable range of alternatives sufficient to inform the Commission and Board and the public regarding the tradeoffs between the degree to which alternatives could reduce environmental impacts as compared to the final plan and the corresponding degree to which the alternatives would hinder achievement of the project objectives and/or be infeasible. Comparing the potential impacts of the final plan and three alternatives analyzed in the EIR illustrates that impacts of the final plan are largely a result of the influx of 1.8 million new residents between 2020 and 2050, as well as the final plan's expansive reach (covering 9 counties and 101 cities), and due to the limitations on MTC and ABAG's ability to enforce mitigation measures identified in the program EIR. Pursuant to SB 375, any alternative proposed would confront these same obstacles because the final plan, by statute, must "house all the population of the region, including **all economic segments of the population**, over the course of the planning period" and no version of the final plan is authorized to "regulate[] the use of land… [or] supersed[e] the exercise of the land use authority of cities and counties within the region." (Gov. Code, § 65080, subds. (b)(2)(B), (b)(2)(K).) After reviewing all proposed alternatives raised by commenters and in consideration of the above obstacles and limitations, the Commission and Board find that the range of alternatives studied in the EIR reflects a reasonable analysis of various types of alternatives that would potentially be capable of reducing the environmental effects of the final plan. The three alternatives analyzed in the EIR (as well as the final plan) cover a comprehensive range of reasonable possibilities in support of the final action of the Commission and Board. (See *Save Our Access etc. v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8, 30-33.)

The factors that may be considered by a lead agency in evaluating alternatives analyzed in an EIR include (1) the ability to avoid or substantially lessen potentially significant environmental impacts of the proposed project, (2) the ability to achieve project objectives including the statutory objectives to achieve the GHG emission reduction targets established pursuant to SB 375 and house all economic segments the population, and (3) feasibility of the alternatives. Each of these considerations is discussed in more detail below as it relates to the final plan.

1. <u>The Ability of an Alternative to Avoid or Substantially Lessen Potentially Significant and Unavoidable Environmental Impacts</u>

CEQA does not require a lead agency to consider adopting project alternatives simply because they perform better than a proposed project in some respects. In considering whether to adopt a specific project alternative, CEQA requires the lead agency to determine whether the alternative has the potential to avoid or substantially lessen the proposed project's significant and unavoidable impacts. (Pub. Resources Code, § 21002.) Per the EIR analysis, the final plan could result in the following significant and unavoidable impacts:

- **Impact AES-1:** Have a substantial adverse effect on a scenic vista
- **Impact AES-2:** Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway
- **Impact AES-3:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality
- **Impact AES-4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area
- **Impact AGF-1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract
- **Impact AGF-2:** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))
- **Impact AGF-3:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use
- **Impact AQ-2:** Result in a substantial net increase in construction-related emissions
- **Impact AQ-3:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard
- **Impact AQ-4:** Expose sensitive receptors to substantial pollutant concentrations
- **Impact BIO-1a:** Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries
- **Impact BIO-3:** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites
- **Impact BIO-5:** Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant

or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species

- **Impact CUL/TCR-1:** Cause a substantial adverse change in the significance of a built environment historical resource as defined in Guidelines Section 15064.5
- **Impact CUL/TCR-2:** Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5
- **Impact CUL/TCR-4:** Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe
- **Impact GEO-7:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature
- **Impact GHG-1:** Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to 2015 conditions that may have a significant impact on the environment
- **Impact GHG-3:** Conflict with an applicable State plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases
- **Impact HAZ-4:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment
- **Impact HAZ-6:** Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan
- **Impact HAZ-7:** Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones
- **Impact LU-1:** Physically divide an established community
- **Impact LU-4:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere
- **Impact NOISE-1:** Generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
- **Impact NOISE-2:** Generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
- **Impact NOISE-3:** Generate excessive groundborne vibration or groundborne noise levels
- **Impact NOISE-4:** For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels
- **Impact PSR-1:** Result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities
- **Impact PSR-2:** Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or

include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment

- **Impact PUF-1:** Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects
- **Impact PUF-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years
- **Impact PUF-3:** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments
- **Impact PUF-4:** Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with federal, state, and local management and reduction statutes and regulations related to solid waste
- **Impact TRA-2:** Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)

Of the above 35 potentially significant and unavoidable impacts, 12 can be mitigated to a less than significant level by mitigation measures (which if necessary and feasible are required of projects taking advantage of CEQA Streamlining provisions of SB 375), but are nevertheless considered potentially significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt the mitigation measures.

Pursuant to CEQA, a lead agency may reject a project alternative that is incapable of avoiding or substantially lessening the proposed project's potentially significant and unavoidable impacts. (*See Laurel Hills Homeowners Association v. City Council* (1978) 83 Cal.App.3d 515, 521.) Even if a project alternative is capable of avoiding or substantially lessening one or more potentially significant and unavoidable impacts of a proposed project, if the alternative will result in other potentially significant and unavoidable impacts not caused by the proposed project, then the lead agency may determine the alternative is not environmentally superior to the proposed project and reject it on that ground.

2. <u>The Ability of an Alternative to Achieve Basic Project Objectives</u>

In evaluating the merits of alternatives analyzed in the EIR, the lead agency must consider the relationship between each alternative and the project objectives.

The final plan's adopted vision is to ensure the Bay Area is affordable, connected, diverse, healthy, and vibrant for all by the year 2050. To support this vision, MTC and ABAG developed guiding principles and performance measures in conjunction with members of the public, partners, and elected officials. In addition, SB 375 mandates two performance targets related to housing all economic segments of the population and reducing per-capita GHG emissions from cars and light-duty trucks. Together, the guiding principles and performance metrics serve as the basis for the following project objectives:

1. Address climate change by reducing carbon dioxide (CO2) emissions pursuant to targets established by the California Air Resources Board (CARB); specifically, meet or exceed a 19% reduction in per-capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels.
2. House 100% of the region's projected growth by income level, and with no increase in in-commuters over the proposed plan baseline year.
3. Ensure that all current and future Bay Area residents and workers have sufficient housing options they can afford by reducing how much residents spend on housing and transportation and by producing and preserving more affordable housing.

4. Support an expanded, well-functioning, safe and multimodal transportation system that connects the Bay Area by improving access to destinations and by ensuring residents and workers have a transportation system they can rely on.
5. Support an inclusive region where people from all backgrounds, abilities, and ages can remain in place with full access to the region's assets and resources by creating more inclusive communities and reducing the risk that Bay Area residents are displaced.
6. Conserve the region's natural resources, open space, clean water, and clean air with the intent of improving health of Bay Area residents and workers and improving the health of the environment locally and globally.
7. Support the creation of quality job opportunities for all and ample fiscal resources for communities by enabling the Bay Area economy to thrive and supporting the recovery of the region's downtowns from the pandemic.

In determining whether to adopt or reject an environmentally superior alternative, CEQA permits a lead agency to consider the ability of an alternative to fulfill the project objectives. (*Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715 [decision makers may reject an alternative that does not fully satisfy the objectives associated with a proposed project]; *Sierra Club v. County of Napa* (2004) 121 Cal.App.4th 1490, 1507-1508 [upholding findings rejecting reduced density alternative because it met some but not all of the applicant's project objectives]; *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000–1001 [court found that the lead agency was legally justified in rejecting environmentally superior alternatives because they were undesirable from a policy standpoint because they failed to achieve what the agency regarded as primary objectives of the project].) Although lead agencies commonly consider the ability of an alternative to achieve the project objectives in combination with evaluating its feasibility, these are two separate, although overlapping inquiries. (See CEQA Guidelines, § 15126.6, subd. (c).)

3. Feasibility of Alternatives

Under CEQA, "(f)easible means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines, §§ 15091, subd. (a)(3), 15364.) The issue of feasibility of alternatives arises twice in the CEQA process, once when the EIR is prepared, and again when CEQA findings are adopted. When assessing feasibility in an EIR, the EIR preparer evaluates whether an alternative is "potentially" feasible. Potentially feasible alternatives are suggestions by the EIR preparers which may or may not be adopted by lead agency decisionmakers. When CEQA findings are made as part of the EIR certification process, the lead agency decision-making body independently evaluates whether the alternatives are actually feasible, including whether an alternative is impractical or undesirable from a policy standpoint. (*California Native Plant Society, supra,* 177 Cal.App.4th at pp. 998, 1001; *City of Del Mar, supra,* 133 Cal.App.3d at pp. 416-417.) A lead agency's determination regarding the feasibility of a project alternative must be supported by substantial evidence in the administrative record.

Section 15126.6(f)(1) through (3) of the CEQA Guidelines provides a discussion of factors that can be taken into account in determining the feasibility of alternatives. These factors include but are not limited to:

- Site Suitability;
- Economic Viability;
- Availability of Infrastructure;
- Consistency with Local and Regional Plans;
- Other Plans or Regulatory Limitations;
- Jurisdictional Boundaries / Regional Context;

- Property Ownership and Control;
- Ability to Ascertain Potential Impacts; and
- Remote or Speculative Nature of the Alternative.

Decisionmakers enjoy considerable discretion in determining whether a particular alternative set forth in an EIR, including an environmentally superior alternative, is "infeasible" and thus may be rejected without violating CEQA. As the California Supreme Court has emphasized, "[t]he wisdom of approving any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced." (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576 (*Goleta II*).) As stated in the concurring opinion in *California Native Plant Society v. City of Santa Cruz* (2007) 177 Cal.App.4th 957, CEQA does not require an agency to choose the environmentally superior alternative. It simply requires the agency to consider environmentally superior alternatives, explain the considerations that led it to conclude that those alternatives were infeasible, weigh those considerations against the environmental harm that the proposed project would cause, and make findings that the benefits of those considerations outweighed the harm. (177 Cal.App.4th at pp. 1000-1001 (conc. opn. of Mihara, J.).)

Agency decisionmakers are free to reject an alternative that they consider undesirable from a policy standpoint, provided that any such decision reflects "a reasonable balancing of the relevant economic, environmental, social, and technological factors." (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.)

2.9.2 Summary of Alternatives Considered, But Not Analyzed in the EIR

Alternatives were considered during scoping of the plan, including suggestions from stakeholders. CEQA Guidelines Section 15126.6(c) identifies three factors that may be used to eliminate alternatives from detailed consideration in an EIR: failure to meet most of the basic project objectives, infeasibility, and inability to avoid significant environmental impacts. "Feasible" is defined as "capable of being accomplished within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364). The feasibility of an alternative may be determined based on a variety of factors, including economic viability, availability of infrastructure, and other plans or regulatory limitations (CEQA Guidelines Section 15126.6[f][1]). The following discussion briefly describes each alternative suggested during the scoping process that was not evaluated further and provides the Commission-Board's conclusion regarding why each does not warrant further review.

LOCAL CONTEXT ALTERNATIVE

The City of Livermore suggested an alternative with a land use scenario that would adjust density and parking based on local context and existing built environments. While this approach may enhance local flexibility, it could also result in less concentrated growth, leading to higher VMT, increased air pollution, GHG emissions, and energy consumption. Transit-oriented communities and compact urban growth help reduce these environmental impacts. There is no evidence that a more localized approach would yield greater environmental benefits. Additionally, the No Project Alternative evaluates a similar scenario by maintaining existing density standards and local parking policies while avoiding upzoning. Because this alternative would not be expected to reduce significant environmental effects compared to the proposed plan, it is not identified for further study in the EIR.

EQUITY PRIORITY COMMUNITIES ALTERNATIVE

Alameda County suggested an alternative growth approach to prioritize EPCs and areas outside major job centers. While increasing housing access and economic opportunities in EPCs could offer social benefits, concentrating too much growth in these areas may reinforce exclusion by allowing higher resource areas to avoid new housing. Redirecting growth away from job centers could worsen the region's housing shortage by limiting the supply of housing near employment centers, leading to longer commute times, increased VMT, and higher GHG emissions. Additionally, this alternative does not align with the plan objective to support the creation of quality job opportunities for all and ample fiscal resources for communities by enabling the Bay Area economy to thrive and supporting the recovery of the region's downtowns from the pandemic. Because this alternative does not demonstrate an ability to reduce significant environmental effects compared to the proposed plan and is inconsistent with the plan objectives it is not identified for further study in the EIR.

SEA LEVEL RISE ALTERNATIVE

The Citizens Committee to Complete the Refuge suggested an alternative to restrict new development in areas projected to be inundated by 4.9 feet of sea level rise. This alternative would limit the area of developable land in the plan area. Although the majority of growth under the proposed plan would take place outside of a 4.9-foot inundation area, there are areas in the land use growth footprint that have been mapped in this inundation zone. The proposed plan excludes development in high-risk areas, such as Very High Fire Hazards Severity Zones and areas subject to sea level rise, unless mitigated by Strategy EN1. Strategy EN1 adapts shorelines to withstand 4.9 feet of inundation from both permanent sea level rise and temporary flooding due to king tides and storms. This alternative would not provide a distinct or substantively different approach than the proposed plan because this alternative would restrict development in areas of inundation and the plan would limit growth in these areas unless adaptation strategies are implemented. Additionally, MTC and ABAG have no authority to restrict or prohibit development in certain areas making this alternative infeasible. While the proposed plan can establish the Growth Geographies, it cannot prohibit development in certain areas. Because this alternative would not contribute to a reasonable range of alternatives, it is not identified for further study in the EIR.

LOWER FEDERAL TRANSPORTATION FUNDING ALTERNATIVE

The Santa Clara Valley Transportation Authority suggested an alternative that would assume a reduction in federal revenue. This alternative assumes a decline in federal transportation funding, which would impact investment decisions. Each of the alternatives is constrained by the same planning assumptions as the proposed plan and maintain the same regional growth forecasts—population, employment, households—and maintain the same forecast of reasonably available transportation revenues. Significantly altering these planning assumptions would hinder the ability to assess how different strategies achieve the plan's objectives. In addition, Alternative 1 and the No Project Alternative (discussed below) have smaller transportation footprints than the proposed plan, and the proposed plan's investment approach already reflects financial constraints, relying on a forecast of reasonably available revenues. Because this alternative would not contribute to a reasonable range of alternatives, it is not identified for further study in the EIR.

2.9.3 Ability to Reduce Impacts, Ability to Attain Project Objectives, and Feasibility of Alternatives Analyzed in EIR

Based on impacts identified in the EIR, and other reasons documented below, the Commission and Board finds that adoption and implementation of the final plan as revised by the Final EIR and the final plan, is the most desirable, feasible, and appropriate action and rejects the other alternatives as infeasible based on consideration of the relevant factors identified herein.

NO PROJECT ALTERNATIVE

1. Ability of the No Project Alternative to Substantially Reduce or Avoid Potentially Significant and Unavoidable Environmental Impacts

The No Project Alternative would lessen some of the final plan's potentially significant and unavoidable impacts including: **Impact BIO-3:** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites, **Impact HAZ-6:** Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan, **Impact LU-1:** Physically divide an established community, and **Impact LU-4:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. However, it would not substantially lessen any of those impacts to a less than significant level.

As demonstrated in the EIR, the No Project Alternative would also result in three more significant and unavoidable impacts than the final plan (**Impact AQ-1:** Conflict with or obstruct implementation of the applicable air quality plan, **Impact GHG-2:** Conflict with the Bay Area region's achievement of the GHG emissions reduction target of 19% below 2005 emissions by 2035 established by CARB pursuant to SB 375Impact, and **GHG-4:** Conflict with an applicable local plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases). Additionally, the No Project Alternative may increase the significance of the final plan's potentially significant and unavoidable impacts including:

- **Impact AES-1:** Have a substantial adverse effect on a scenic vista,
- **Impact AES-2:** Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway,
- **Impact AES-3:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality,
- **Impact AES-4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area,
- **Impact AGF-1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract,
- **Impact AGF-2:** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])
- **Impact AGF-3:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use,
- **Impact AQ-3:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard,
- **Impact AQ-4:** Expose sensitive receptors to substantial pollutant concentrations,
- **Impact BIO-1a:** Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries,

- **Impact BIO-5:** Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species,
- **Impact GHG-1:** Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to existing 2015 conditions that may have a significant impact on the environment,
- **Impact GHG-3:** Conflict with an applicable State plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases,
- **Impact CUL/TCR-1:** Cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5,
- **Impact CUL/TCR-2:** Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5,
- **Impact CUL/TCR-4:** Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe,
- **Impact GEO-7:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature,
- **Impact HAZ-7:** Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones,
- **Impact PUF-1:** Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects,
- **Impact PUF-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years, and
- **Impact TRA-2:** Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b).

In summary, while the No Project Alternative may have some benefits as compared to the final plan, the No Project Alternative is not environmentally superior to the final plan because it (1) avoids or substantially lessens four of the final plan's potentially significant and unavoidable impacts, (2) would increase the significance of several significant and unavoidable impacts, and (3) results in multiple additional potentially significant and unavoidable impacts not caused by the final plan. Therefore, the Commission and Board find that the No Project Alternative is not environmentally superior to the final plan and reject the alternative on this ground.

2. <u>Ability of the No Project Alternative to Attain Project Objectives</u>

Objective 1: Address climate change by reducing carbon dioxide (CO2) emissions pursuant to targets established by the California Air Resources Board (CARB); specifically, meet or exceed a 19% reduction in per-capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels.

The No Project Alternative would fail to reduce CO_2 emissions according to targets established by CARB: a 19% reduction in per capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels. Because complying with SB 375 is one of the fundamental objectives of the plan, MTC and ABAG conclude that the No Project Alternative substantially fails to meet the project objectives for this reason alone. (In re Bay-Delta (2008) 43 Cal.4th 1143, 1165.)

The No Project Alternative fails to meet project Objective 1.

Objective 2: House 100% of the region's projected growth by income level, and with no increase in in-commuters over the proposed plan baseline year.

The No Project Alternative would accommodate 100% of the region's projected housing unit growth.

The No Project Alternative meets project Objective 2.

Objective 3: Ensure that all current and future Bay Area residents and workers have sufficient housing options they can afford by reducing how much residents spend on housing and transportation and by producing and preserving more affordable housing.

The No Project Alternative makes minimal progress on reducing household cost burdens and increasing the supply of affordable housing. Under the No Project Alternative, modeling results indicate that Bay Area households would spend 82% of their income on housing and transportation combined in 2050, compared to 94% in 2023. Without increased funding for affordable housing, housing cost burden remains high at 40% in 2050, down slightly from 42% in 2023. Housing costs would remain high, with low-income households still spending 59% of their income, and all households at 29% in 2050. Transportation cost burdens remain largely unchanged. Deed-restricted affordable housing would increase slightly, from 4% to 6% regionwide and from 2% to 4% in HRAs—well below the levels needed to meet regional demand.

The No Project Alternative would fail to meaningfully meet Objective 3.

Objective 4: Support an expanded, well-functioning, safe and multimodal transportation system that connects the Bay Area by improving access to destinations and by ensuring residents and workers have a transportation system they can rely on.

The No Project Alternative would result in worsening freeway congestion and transit crowding, with only marginal gains in job accessibility. By 2050, 46% of all households and 54% of low-income households would live within a half mile of frequent transit—slightly higher than in 2023 but reflecting limited network expansion. Transit accessibility would remain mostly unchanged, with 4% of regional jobs accessible in both 2023 and in 2050. However, freeway travel times would increase substantially due to worsening congestion, and transit crowding would intensify without significant investment. The number of jobs reachable by automobile within 30 minutes would decline as a percentage of total jobs (15%), although the absolute number would grow due to regional job growth. Accessibility outcomes would remain somewhat better in EPCs than for the region overall.

The No Project Alternative would fail to meaningfully meet Objective 4.

Objective 5: Support an inclusive region where people from all backgrounds, abilities, and ages can remain in place with full access to the region's assets and resources by creating more inclusive communities and reducing the risk that Bay Area residents are displaced.

Without the affordable housing strategies in the proposed plan, the 2050 No Project Alternative would result in less equitable housing outcomes, limiting lower-income households' access to better housing and transit opportunities across the region. Without the plan's strategies to support economic mobility, the No Project Alternative results in households with low incomes comprising a higher share of the population by 2050. Regionwide, the share rises from 25% in 2023 to 28% in 2050 under the No Project Alternative. The share of households with low incomes also increases modestly in opportunity-rich areas: in Transit-Rich High Resource Areas (HRAs) it rises from 22% to 25%, in all Transit-Rich Areas (TRAs) from 31% to 33%, and in all HRAs from 18% to 21%. In Equity Priority Communities (EPCs), the trend varies by baseline: using ACS 2014–2018, the share increases from 41% to 43%, while under ACS 2018–2022, it holds steady at 41%. While these increases indicate that households with low incomes are projected to comprise a larger share of households in these geographies, they do not on their own signal more inclusive outcomes.

The No Project Alternative would fail to meaningfully meet Objective 5.

Objective 6: Conserve the region's natural resources, open space, clean water, and clean air with the intent of improving health of Bay Area residents and workers and improving the health of the environment locally and globally.

The No Project Alternative would result in greater impacts on the region's natural resources, open space, and air quality. By 2050, commuting by car would remain dominant at 56% (including 39% single-occupancy), annual fatalities and injuries would increase to 6.4 and 28 per 100,000 residents, and $PM_{2.5}$ emissions from exhaust, brake wear and tire wear would increase from 1.6 tons per day in 2023 to 2.1 tons per day in 2050. These trends would negatively affect public health. Reflecting both the plan's strategies and expected fuel efficiency gains, GHG emissions per capita would decline by 38% in 2050 relative to a 2005 baseline. However, the No Project Alternative would result in a 0.4% increase in GHG emissions in 2050 relative to 2005, when fuel efficiency gains are excluded. Without new investments in parks and open space, park space would decline to 3.8 acres per 1,000 residents, and open space would decline to 91.1 acres per 1,000 residents, resulting in reduced recreational opportunities.

The No Project Alternative would fail to meaningfully meet Objective 6.

Objective 7: Support the creation of quality job opportunities for all and ample fiscal resources for communities by enabling the Bay Area economy to thrive and supporting the recovery of the region's downtowns from the pandemic.

The No Project Alternative would leave existing jobs-housing imbalances in place. The No Project Alternative would direct 75% of new jobs within Growth Geographies, with 52% in TRAs, 6% in Priority Production Areas (PPAs), and 54% in Priority Development Areas (PDAs). Commute distances would show only minor improvements, with low-income workers traveling 9.7 miles on average and all workers 11.9 miles compared to 10.6 and 12.0 miles in 2023, respectively.

The No Project Alternative would fail to meaningfully meet Objective 7.

In summary, the No Project Alternative fails to meet Project Objectives 1, 3, 4, 5, 6 and 7. Additionally, because complying with SB 375 is one of the fundamental objectives of the project (Objective 1), MTC and ABAG conclude that the No Project Alternative substantially fails to meet the project objectives for this reason alone. (*In re Bay-Delta* (2008) 43 Cal.4th 1143, 1165.) For each of these reasons, the Commission and Board find that the No Project Alternative is incapable of achieving most of the plan's basic objectives. The Commission and Board, therefore, reject the No Project Alternative as a result of its inconsistency with the project objectives. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 991-992.)

3. Feasibility of the No Project Alternative

As discussed above, for the purposes of CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account legal and other factors. (CEQA Guidelines, §§ 15091, subd. (a)(3), 15364.) SB 375 requires the SCS for each region to "set forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve, if there is a feasible way to do so, the greenhouse gas emission reduction targets approved by the state board." (Gov. Code, § 65080, subd. (b)(2)(B).) Because the Commission and Board find the final plan constitutes a feasible plan to achieve the GHG emissions reduction targets for the region, adopting an alternative plan that fails to achieve the targets would be inconsistent with the requirements of SB 375. (*Ibid*.) While MTC and ABAG could adopt the No Project Alternative and meet federal planning requirements, MTC

and ABAG may not, without violating their legal obligations pursuant to SB 375, adopt an RTP that excludes an SCS capable of achieving the region's GHG emissions reduction targets where feasible to do so.

Therefore, because the No Project Alternative fails to achieve the GHG emissions reduction targets for the region and would otherwise violate MTC's and ABAG's legal obligations, adopting the No Project Alternative is infeasible as a matter of law. (*Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039-1040.)

4. Conclusions Regarding the Merits and Feasibility of the No Project Alternative

The Commission and Board find that each of the reasons articulated above independently demonstrate that the No Project Alternative does not warrant its approval in lieu of the final plan. Therefore, the Commission and Board reject the No Project Alternative.

ALTERNATIVE 1 – NO NEW HIGHWAY AND TRANSIT REINVESTMENT ALTERNATIVE

1. Ability of the No New Highway and Transit Reinvestment Alternative to Substantially Reduce or Avoid Potentially Significant and Unavoidable Environmental Impacts

The No New Highway and Transit Reinvestment Alternative results in the same number of less-than-significant and significant and unavoidable impacts as the final plan. Generally, as shown in **Table 4-34** of the Draft EIR, the No New Highway and Transit Reinvestment Alternative may somewhat reduce the significance of some of the plan's significant and unavoidable impacts, though not to a less-than-significant level, including **Impact AQ-3:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard, **Impact BIO-3:** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites, **Impact GHG-1:** Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to existing 2015 conditions that may have a significant impact on the environment, **Impact HAZ-7:** Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones, and **Impact LU-1:** Physically divide an established community.

In summary, while the No New Highway and Transit Reinvestment Alternative performs similarly to the final plan in many respects and may have some environmental benefits as compared to the final plan, the No New Highway and Transit Reinvestment Alternative is not environmentally superior to the final plan because it does not avoid or reduce any of the final plan's potentially significant and unavoidable impacts to a less than significant level. (*City of Long Beach v. Los Angeles Unified School Dist*. (2009) 176 Cal.App.4th 889, 921.) Therefore, the Commission and Board find that the No New Highway and Transit Reinvestment Alternative is not environmentally superior to the final plan and reject the No New Highway and Transit Reinvestment Alternative on this ground.

2. Ability of the No New Highway and Transit Reinvestment Alternative to Attain Project Objectives

Objective 1: Address climate change by reducing carbon dioxide (CO2) emissions pursuant to targets established by the California Air Resources Board (CARB); specifically, meet or exceed a 19% reduction in per-capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels.

The No New Highway Capacity and Transit Reinvestment Focus Alternative would reduce per capita emissions from cars and light-duty trucks by 2035 by 21% relative to 2005 levels, which would meet the 19% reduction target.

The No New Highway Capacity and Transit Reinvestment Focus Alternative meets project Objective 1.

Objective 2: House 100% of the region's projected growth by income level, and with no increase in in-commuters over the proposed plan baseline year.

The No New Highway Capacity and Transit Reinvestment Alternative would accommodate 100% of the region's projected housing unit growth.

The No New Highway Capacity and Transit Reinvestment Alternative meets project Objective 2.

Objective 3: Ensure that all current and future Bay Area residents and workers have sufficient housing options they can afford by reducing how much residents spend on housing and transportation and by producing and preserving more affordable housing.

The No New Highway Capacity and Transit Reinvestment Alternative significantly reduces household cost burdens and increases the supply of affordable housing. This alternative would ensure sufficient housing options for current and future Bay Area residents and workers through implementation of policies that plan for sufficient housing at all income levels and lower transportation costs for those that are most burdened. Combined housing and transportation cost burdens would be 46% for low-income households and 32% for all households in 2050, decreases from 94% and 42% in 2023, respectively. The share of housing that is deed-restricted affordable housing would reach 27% regionwide and 23% in high resource areas in 2050, increases from 4% and 2% in 2023, respectively.

The No New Highway Capacity and Transit Reinvestment Focus Alternative meets project Objective 3.

Objective 4: Support an expanded, well-functioning, safe and multimodal transportation system that connects the Bay Area by improving access to destinations and by ensuring residents and workers have a transportation system they can rely on.

The No New Highway Capacity and Transit Reinvestment Focus Alternative would substantially expand access to high-quality transit and improve connectivity to jobs via all travel modes. Compared to 2023, the share of households and jobs near frequent transit would increase significantly, while job accessibility—especially via transit—would improve modestly across the region. The number of jobs accessible by 45-minute transit trips increase to 317,000 in 2050 from 127,000 in 2023, due to higher frequency service and greater investment in transit infrastructure. The number of jobs accessible by 30-minute auto trips increases to 889,000 in 2050 from 694,000 in 2023. Walk and bike access to jobs would also improve. The share of household and jobs within ½ mile of high frequency transit improve to 62% (households) from 43% and 61% (jobs) from 52%. Crowding would be reduced for key local transit operators, and in a few corridors, freeway travel times improve.

The No New Highway Capacity and Transit Reinvestment Focus Alternative meets project Objective 4.

Objective 5: Support an inclusive region where people from all backgrounds, abilities, and ages can remain in place with full access to the region's assets and resources by creating more inclusive communities and reducing the risk that Bay Area residents are displaced.

The No New Highway Capacity and Transit Reinvestment Alternative's inclusion of affordability strategies provide greater opportunities for households with low incomes to remain in place or relocate to inclusive, high-opportunity areas. The share of low-income households in HRAs would rise to 20% in 2050 from 18% in 2023, and in TRAs rise to 40% from 31%.

The No New Highway Capacity and Transit Reinvestment Focus Alternative meets project Objective 5.

Objective 6: Conserve the region's natural resources, open space, clean water, and clean air with the intent of improving health of Bay Area residents and workers and improving the health of the environment locally and globally.

The New Highway Capacity and Transit Reinvestment Alternative would conserve the region's natural resources, open space, clean water, and clean air through implementation of policies that improve public health and improve local and global environmental outcomes. This alternative achieves or exceeds CARB's GHG targets, reduces fatality and injury rates, and significantly expands resilience investments. This alternative would result in reduced impacts on the region's natural resources, open space, and air quality, creating a healthier and safer region for residents. Annual fatalities and injuries would be 4.2 and 20.0 per 100,000 residents, falling from 5.8 and 25.2 in 2023, respectively. PM2.5 emissions from exhaust, brake wear and tire wear would increase from 1.6 tons per day in 2023 to 1.8 tons per day in 2050. GHG emissions per capita would fall by 41% in 2050 relative to a 2005 baseline, when fuel efficiency gains are included. Park access and publicly accessible open space per 1,000 residents increases to 140.7 from 112.9 in 2023. The single occupancy auto commute mode share falls to 31% from 41% in 2023. Therefore, this alternative would meaningfully address regional health, safety, and climate resilience needs.

The No New Highway Capacity and Transit Reinvestment Focus Alternative meets project Objective 6.

Objective 7: Support the creation of quality job opportunities for all and ample fiscal resources for communities by enabling the Bay Area economy to thrive and supporting the recovery of the region's downtowns from the pandemic.

The No New Highway Capacity and Transit Reinvestment Alternative would promote better jobs-housing balance through infill housing in job centers and new employment in housing-rich areas. These shifts would help reduce average commute distances and improve access for low-income workers. This alternative would result in 72% of job growth in Growth Geographies, 50% in TRAs, 8% in PPAs and 52% in PDAs. Commute distances decrease, averaging 11.1 miles for all workers and 8.7 miles for low-income workers, compared to 12.0 and 10.6 in 2023, respectively.

The No New Highway Capacity and Transit Reinvestment Focus Alternative meets project Objective 7.

In summary, the No New Highway Capacity and Transit Reinvestment Focus Alternative would meet all seven project objectives. Overall, the performance of this alternative is comparable to that of the final plan across the seven project objectives. While minor variations occur in certain areas, these differences are marginal and not considered substantively different in terms of overall performance relative to the project objectives.

3. Feasibility of the No New Highway and Transit Reinvestment Alternative

As discussed above, for the purposes of CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account legal, social and other factors. (CEQA Guidelines, §§ 15091, subd. (a)(3), 15364.) The No New Highway and Transit Reinvestment Alternative modifies the mix of transportation strategies relative to the final plan.

The No New Highway Capacity and Transit Reinvestment Alternative modifies four transportation strategies in the final plan. As a result, this alternative diverges from the region's balanced multimodal investment priorities developed through extensive coordination with county transportation agencies (CTAs), transit operators and local jurisdictions. Instead, this alternative modifies the final plan strategies by removing $0.5 billion in funding to modernize freeways and interchanges, eliminating $3.7 billion to expand freeways and mitigate impacts, and removing $2.1 billion to advance other local priorities, specifically local principal arterial expansion projects across the region. The alternative instead redirects $6.2 billion in funding to projects that enhance transit frequency, capacity and reliability.

The redirection of funds from freeway and principal arterial expansion projects responds to some comments received during the scoping process; however, it is inconsistent with project priorities in existing voter-approved county sales tax measures, the adopted regional Transportation Improvement Program (TIP) and other locally identified priorities.

Based on MTC's and ABAG's coordination and collaboration with CTAs, transit operators and local jurisdictions to identify local needs and priorities during the plan development process, the Commission and Board find that the modified package of transportation strategies as proposed by the No New Highway and Transit Reinvestment Alternative are unlikely to be implemented.

The Commission and Board find that the substantial differences between transportation investments identified in voter-approved county sales tax measure expenditure plans and those required to implement the No New Highway and Transit Reinvestment Alternative render the alternative infeasible from a policy and implementation perspective.

4. Conclusions Regarding the Merits and Feasibility of the No New Highway and Transit Reinvestment Alternative

The Commission and Board conclude that the No New Highway and Transit Reinvestment Alternative is not environmentally superior to the final plan because it does not avoid or substantially lessen any of the final plan's potentially significant and unavoidable impacts to a less-than-significant level. The Commission and Board find that the No New Highway and Transit Reinvestment Alternative is less capable of achieving the full scope of the plan's objectives. Additionally, the Commission and Board find that the No New Highway and Transit Reinvestment Alternative is not feasible and does not warrant approval in lieu of the final plan. Therefore, the Commission and Board reject No New Highway and Transit Reinvestment Alternative.

ALTERNATIVE 2 – TOC GROWTH FOCUS ALTERNATIVE

1. Ability of the TOC Growth Focus Alternative to Substantially Reduce or Avoid Potentially Significant and Unavoidable Environmental Impacts

The TOC Growth Focus Alternative results in the same number of less-than-significant and significant and unavoidable impacts as the final plan. Generally, as shown in **Table 4-34** of the Draft EIR, the TOC Growth Focus Alternative may reduce the significance of the plan's significant and unavoidable impacts, though not to a less-than-significant level, including

- **Impact AES-1:** Have a substantial adverse effect on a scenic vista, **Impact AES-2:** Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway, **Impact AES-3:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality,
- **Impact AES-4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area,
- **Impact AGF-2:** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g]),
- **Impact AQ-3:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard ,

- **Impact BIO-1a:** Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries,
- **Impact BIO-3:** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites,
- **Impact BIO-5:** Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species,
- **Impact CUL/TCR-1:** Cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5,
- **Impact CUL/TCR-2:** Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5,
- **Impact CUL/TCR-4:** Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe,
- **Impact GEO-7:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature,
- **Impact HAZ-7:** Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones,
- **Impact PUF-1:** Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects, and
- **Impact PUF-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

Additionally, the TOC Growth Focus Alternative may increase the significance of the final plan's potentially significant and unavoidable impacts including: **Impact AGF-1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract, and **Impact LU-4:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Overall, the TOC Growth Focus Alternative would have lower acreage of new developed land, lower acreage of development in agriculturally zoned land, lower development in TAC Risk Areas, and lower acreage in Bay Area Critical Linkages. Although total daily VMT would be slightly lower under the No New Highway Capacity and Transit Reinvestment Alternative than under the TOC Growth Focus Alternative, both alternatives would have the same daily VMT per capita. Even though the level or degree of resulting significant-and-unavoidable impacts would be similar under the No New Highway Capacity and Transit Reinvestment Alternative and the TOC Policy Area Alternative, impacts would be reduced overall under the TOC Growth Focus Alternative, and therefore is environmentally superior to the other alternatives (Draft EIR Section 4.6, "Environmentally Superior Alternative").

In summary, the TOC Growth Focus Alternative has environmental results similar to those of the final plan. The TOC Growth Focus Alternative lessens – although does not substantially lessen – many of the final plan's

significant and unavoidable impacts. Therefore, compared comprehensively to the final plan, the TOC Growth Focus Alternative is the environmentally superior alternative. Overall, the Commission and Board find that the TOC Growth Focus Alternative is environmentally superior to the final plan, albeit only marginally.

2. Ability of the TOC Growth Focus Alternative to Attain Project Objectives

Objective 1: Address climate change by reducing carbon dioxide (CO2) emissions pursuant to targets established by the California Air Resources Board (CARB); specifically, meet or exceed a 19% reduction in per-capita emissions from cars and light-duty trucks by 2035 relative to 2005 levels.

The TOC Growth Focus Alternative would reduce per capita emissions from cars and light-duty trucks by 2035 by 21% relative to 2005 goals, which would meet the 19% reduction target.

The TOC Growth Focus Alternative meets project Objective 1.

Objective 2: House 100% of the region's projected growth by income level, and with no increase in in-commuters over the proposed plan baseline year.

The TOC Growth Focus Alternative would accommodate 100% of the region's projected housing unit growth.

The TOC Growth Focus Alternative meets project Objective 2.

Objective 3: Ensure that all current and future Bay Area residents and workers have sufficient housing options they can afford by reducing how much residents spend on housing and transportation and by producing and preserving more affordable housing.

The TOC Growth Focus Alternative significantly reduces household cost burdens and increases the supply of affordable housing. This alternative would ensure sufficient housing options for current and future Bay Area residents and workers through implementation of policies that plan for sufficient housing at all income levels and lower transportation costs for those that are most burdened. Combined housing and transportation cost burdens would be 46% for low-income households and 32% for all households in 2050, decreases from 94% and 42% in 2023, respectively. The share of housing that is deed-restricted affordable housing would reach 28% regionwide and 22% in high resource areas in 2050, increases from 4% and 2% in 2023, respectively.

The TOC Growth Focus Alternative meets project Objective 3.

Objective 4: Support an expanded, well-functioning, safe and multimodal transportation system that connects the Bay Area by improving access to destinations and by ensuring residents and workers have a transportation system they can rely on.

The TOC Growth Focus Alternative would substantially expand access to high-quality transit and improve connectivity to jobs via all travel modes. Compared to 2023, the share of households and jobs near frequent transit would increase significantly, while job accessibility—especially via transit—would improve modestly across the region. This alternative would concentrate growth in transit-oriented areas, reinforcing transit accessibility. Concentrated development in TOCs would enhance walkability and job proximity. The number of jobs accessible by 45-minute transit trips increase to 303,000 in 2050 from 127,000 in 2023. The number of jobs accessible by 30-minute auto trips increases to 885,000 in 2050 from 694,000 in 2023. Walk and bike access to jobs would also improve. The share of household and jobs within ½ mile of high frequency transit improves to 62% (households) from 43% and 61% (jobs) from 52%. Though transit crowding persists, this alternative would support reduced automobile dependency through better land use and improved local transit connections.

The TOC Growth Focus Alternative meets project Objective 4.

Objective 5: Support an inclusive region where people from all backgrounds, abilities, and ages can remain in place with full access to the region's assets and resources by creating more inclusive communities and reducing the risk that Bay Area residents are displaced.

The TOC Growth Focus Alternative's inclusion of affordability strategies provide greater opportunities for households with low incomes to remain in place or relocate to inclusive, high-opportunity areas. The share of low-income households in HRAs would rise to 19% in 2050 from 18% in 2023, and in TRAs rise to 39% from 31%.

The TOC Growth Focus Alternative meets project Objective 5.

Objective 6: Conserve the region's natural resources, open space, clean water, and clean air with the intent of improving health of Bay Area residents and workers and improving the health of the environment locally and globally.

The TOC Growth Focus Alternative would conserve the region's natural resources, open space, clean water, and clean air through implementation of policies that improve public health and improve local and global environmental outcomes. This alternative achieves or exceeds CARB's GHG targets, reduces fatality and injury rates, and significantly expands resilience investments. Annual fatalities and injuries would be 4.2 and 20.1 per 100,000 residents, falling from 5.8 and 25.2 in 2023, respectively. PM2.5 emissions from exhaust, brake wear and tire wear would increase from 1.6 tons per day in 2023 to 1.8 tons per day in 2050. GHG emissions per capita would fall by 40% in 2050 relative to a 2005 baseline, when fuel efficiency gains are included. Park access and publicly accessible open space per 1,000 residents increases to 140.7 from 112.9 in 2023. The single occupancy auto commute mode share falls to 31% from 41% in 2023. Therefore, this alternative would meaningfully address regional health, safety, or climate resilience needs.

The TOC Growth Focus Alternative meets project Objective 6.

Objective 7: Support the creation of quality job opportunities for all and ample fiscal resources for communities by enabling the Bay Area economy to thrive and supporting the recovery of the region's downtowns from the pandemic.

The TOC Growth Focus Alternative results in job growth in already job-rich areas and would not improve jobs-housing balance as effectively as the plan. This alternative would result in 76% of job growth in Growth Geographies, 53% in TRAs, 7% in PPAs and 56% in PDAs. Commute distances decrease, averaging 11.2 miles for all workers and 8.8 miles for low-income workers, compared to 12.0 and 10.6 in 2023, respectively.

The TOC Growth Focus Alternative meets project Objective 7.

In summary, the TOC Growth Focus Alternative would meet all seven project objectives. Overall, the performance of this alternative is comparable to that of the final plan across the seven project objectives. While minor variations occur in certain areas, these differences are marginal and not considered substantively different in terms of overall performance relative to the project objectives.

3. Feasibility of the TOC Growth Focus Alternative

As discussed above, for the purposes of CEQA, "feasible" means capable of being accomplished in a successful manner within a reasonable period of time, taking into account legal, social and other factors. (CEQA Guidelines, §§ 15091, subd. (a)(3), 15364.) The TOC Growth Focus Alternative modifies the mix of housing and economic strategies relative to the final plan.

The TOC Growth Focus Alternative incorporates the final plan's strategies but concentrates the application of housing and economy strategies in areas subject to MTC's adopted TOC policy (MTC Resolution No. 4530), referred to as "TOC Policy Areas." This approach would result in a greater concentration of job and housing growth in TOC Policy Areas by allowing a greater mix of housing densities and types and a greater mix of land uses densities in TOC Policy Areas. It would also preserve existing affordable housing units in TOC Policy areas and integrate affordable housing into all major housing projects in TOC Policy Areas.

As originally adopted, the TOC Policy envisioned conditioning certain regional transportation funding on local jurisdiction compliance with specified density and intensity zoning standards within TOC Policy Areas. Since adoption of the policy, local jurisdictions have raised concerns regarding implementation, including challenges associated with achieving the prescribed densities and intensities, the need for greater clarity and flexibility in the policy framework, and the need for additional time for jurisdictions to align local plans and regulations with TOC Policy standards.

In response to these concerns, on February 25, 2026, the Commission adopted the TOC Incentive Program as part of the One Bay Area Grant (OBAG) Cycle 4 program, establishing a $45 million incentive-based program and adopting the TOC Evaluation Framework. The TOC Incentive Program is intended to encourage jurisdictions to adopt TOC-consistent policies that support housing production and transit ridership, while directing limited regional funds to jurisdictions demonstrating meaningful progress toward TOC outcomes.

In light of ongoing discussions regarding the implementation of the TOC Policy, concerns raised by local jurisdictions, and the Commission's recent action to pursue an incentive-based approach rather than conditioning funding on mandatory compliance with TOC standards, the Commission and the Board find that the regional policy changes and local planning actions necessary to achieve the level and concentration of residential growth assumed under the TOC Growth Focus Alternative are uncertain and unlikely to be implemented as analyzed in the Draft EIR at this time. For these reasons, the Commission and Board find the TOC Growth Focus Alternative infeasible from a policy and implementation perspective.

4. Conclusions Regarding the Merits and Feasibility of TOC Growth Focus Alternative

CEQA recognizes that in determining whether and how a project should be approved, a public agency has an obligation to balance a variety of public objectives, including economic, legal and social factors, and in particular the goal of providing a decent home and satisfying living environment for every Californian. (CEQA Guidelines, § 15021, subd. (d).) Although the EIR finds that the TOC Growth Focus Alternative is the environmentally superior alternative and capable of achieving all seven project objectives, the Commission and Board conclude that the alternative is infeasible based on recent Commission action to implement the regional TOC policy as an incentive-based program, as well as ongoing concerns raised by local jurisdictions regarding implementation of the TOC Policy standards. These factors indicate that the regional policy changes and local planning actions necessary to implement the level and concentration of growth assumed under the TOC Growth Focus Alternative are unlikely to occur as analyzed in the Draft EIR at this time. For these reasons, the TOC Growth Focus Alternative does not warrant approval in lieu of the final plan. Therefore, the Commission and Board reject the TOC Growth Focus Alternative.

3 STATEMENT OF OVERRIDING CONSIDERATIONS

As set forth in the Findings, MTC and ABAG approval of the final plan will result in significant adverse environmental effects that cannot be avoided even with the adoption of all feasible mitigation measures, and there are no feasible project alternatives which would mitigate or substantially lessen the impacts. The alternatives to the final plan analyzed in the EIR differed from the final plan in important ways that provided for a meaningful comparison. The TOC Growth Focus Alternative was identified as the Environmentally Superior Alternative because it would lessen the severity level of environmental impacts, although only

marginally lower, as compared to all alternatives (Draft EIR, pp. 4-73 to 4-83). In determining whether to approve the Project, CEQA requires MTC and ABAG to balance the benefits of the final plan against its significant and unavoidable environmental impacts. (*See City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417.) "Overriding considerations are intended to show the 'balance' the agency struck in weighing 'the benefits of a proposed project against its unavoidable environmental risks.'" (*Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 356.)

In this case, each of the alternatives had various environmental advantages and disadvantages, but none of the alternatives performed significantly better than the final plan to substantially lessen the final plan's significant and unavoidable impacts. Furthermore, as discussed in detail in the findings related to the rejection of alternatives, during the environmental review MTC and ABAG identified key aspects of the alternatives that render them inferior to the final plan in terms of feasibility. Thus, although the final plan provides similar environmental benefits as compared to the other alternatives, it has a higher probability of successful implementation.

This Statement of Overriding Considerations sets forth the specific reasons supporting MTC's and ABAG's actions in approving the final plan. In making this Statement of Overriding Considerations in support of the findings of fact and the project, MTC and ABAG have considered the information contained in the Findings and in the documents comprising the record of proceedings for the project.

CEQA Guidelines Section 15093(a) provides the following guidance for a statement of overriding considerations:

> CEQA requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable."

If Bay Area lead agencies ensure that mitigation measures identified in this EIR are applied to subsequent discretionary projects, where relevant and applicable, some identified impacts of adoption and implementation of the final plan will be avoided or mitigated to acceptable levels. However, in some cases it cannot be concluded with certainty that implementation of identified feasible mitigation measures would reduce an impact to a less-than-significant level, and no additional feasible mitigation measures are available. Therefore, the following impacts were identified as significant and unavoidable in the Draft EIR:

- **Impact AES-1:** Have a substantial adverse effect on a scenic vista
- **Impact AES-2:** Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway
- **Impact AES-3:** In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality
- **Impact AES-4:** Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area
- **Impact AGF-1:** Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract

- **Impact AGF-2:** Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))
- **Impact AGF-3:** Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use
- **Impact AQ-2:** Result in a substantial net increase in construction-related emissions
- **Impact AQ-3:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard
- **Impact AQ-4:** Expose sensitive receptors to substantial pollutant concentrations
- **Impact BIO-1a:** Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries
- **Impact BIO-3:** Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites
- **Impact BIO-5:** Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species
- **Impact CUL/TCR-1:** Cause a substantial adverse change in the significance of a built environment historical resource as defined in Guidelines Section 15064.5
- **Impact CUL/TCR-2:** Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5
- **Impact CUL/TCR-4:** Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe
- **Impact GEO-7:** Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature
- **Impact GHG-1:** Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to 2015 conditions that may have a significant impact on the environment
- **Impact GHG-3:** Conflict with an applicable State plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases
- **Impact HAZ-4:** Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment
- **Impact HAZ-6:** Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan
- **Impact HAZ-7:** Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones
- **Impact LU-1:** Physically divide an established community

- **Impact LU-4:** Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere
- **Impact NOISE-1:** Generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
- **Impact NOISE-2:** Generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies
- **Impact NOISE-3:** Generate excessive groundborne vibration or groundborne noise levels
- **Impact NOISE-4:** For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels
- **Impact PSR-1:** Result in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities
- **Impact PSR-2:** Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment
- **Impact PUF-1:** Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities the construction or relocation of which could cause significant environmental effects
- **Impact PUF-2:** Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years
- **Impact PUF-3:** Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments
- **Impact PUF-4:** Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and comply with federal, state, and local management and reduction statutes and regulations related to solid waste
- **Impact TRA-2:** Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)

Of the above 35 potentially significant and unavoidable impacts, 12 can be mitigated to a less than significant level by mitigation measures (which if necessary and feasible are required of projects taking advantage of CEQA Streamlining provisions of SB 375), but are nevertheless considered potentially significant and unavoidable because MTC and ABAG cannot require local implementing agencies to adopt the mitigation measures.

The results of the environmental analysis on the final plan are discussed in detail in the Draft EIR, the Final EIR, and the Findings. MTC and ABAG reached the conclusions below pursuant to Public Resources Code Section 21081 and State CEQA Guidelines Section 15093. Despite the occurrence of remaining significant and unavoidable effects, MTC and ABAG choose to approve the final plan because the economic, social, and other benefits that the plan will produce for the region outweigh the significant unmitigated adverse impacts. Pursuant to CEQA Section 21081(b) and Guidelines Section 15093, MTC and ABAG have balanced the

benefits of the plan against the unavoidable adverse impacts associated with the plan and have included all feasible mitigation measures in the EIR. MTC and ABAG have also examined all of the alternatives and determined that adoption and implementation of the final plan is the most desirable, feasible, and appropriate action.

The following statements describe the final plan's benefits considered by decision makers in determining whether to adopt the final plan despite its potentially significant adverse environmental effects. MTC and ABAG conclude that any one of the statements below is independently sufficient to justify approval of the project. The substantial evidence supporting the various benefits of the project can be found in the preceding Findings, which are incorporated by reference into this section, and in the documents found in the Record of Proceedings.

Statement 1: The final plan reflects an extensive, inclusive, and iterative public and stakeholder engagement process. Plan Bay Area 2050+ built on the robust, multi-year engagement process that informed adoption of Plan Bay Area 2050. While Plan Bay Area 2050+ was a limited and focused update, public engagement was as robust as previous iterations of the plan. Furthermore, the engagement program was designed to support a limited and focused update that refines existing strategies and implementation actions rather than reconsidering the region's overall long-range planning framework.

Plan Bay Area 2050 reflected input from more than 23,000 Bay Area residents and stakeholders over nearly four years of outreach, generating over 234,000 comments through more than 450 public meetings and events. That process prioritized engagement with Equity Priority Communities and other historically underserved populations and established the policy framework and strategic foundation carried forward into Plan Bay Area 2050+.

Building on this foundation, MTC and ABAG engaged more than 17,600 residents across the Bay Area through more than a 120 public and stakeholder in-person, virtual and hybrid events and activities for Plan Bay Area 2050+, collecting more than 15,600 comments and over 40,500 data points. More than 70 percent of engagement activities focused on Equity Priority Communities and other socially or economically disadvantaged populations, ensuring that communities most affected by housing, transportation, climate, and economic challenges had a meaningful role in shaping the final plan.

Public engagement for Plan Bay Area 2050+ occurred through four distinct rounds aligned with successive stages of plan development and refinement. Early engagement focused on understanding how strategies adopted in Plan Bay Area 2050 could be adapted to post-pandemic conditions and evolving regional needs. Subsequent rounds emphasized prioritizing policies and investments, refining implementation actions, and coordinating with public agency partners, technical stakeholders, and community-based organizations. A final round supported public review of the Draft Plan Bay Area 2050+, the Implementation Plan, the Draft Environmental Impact Report, and related materials, consistent with statutory and CEQA requirements.

This engagement directly informed development of Plan Bay Area 2050+, the region's fourth integrated long-range plan prepared pursuant to Senate Bill 375, and shaped refinement of its strategies and implementation actions. In contrast, the EIR Alternatives were developed over a comparatively short period of time and relied on more limited public engagement, primarily through the CEQA scoping process. As a result, advancing an alternative would not reflect the breadth and depth of public and stakeholder input that informed the final plan.

Statement 2: The final plan advances a refined and updated set of regional strategies that respond to post-pandemic realities, evolving regional priorities, and implementation experience gained since adoption of the prior plan. Rather than redefining the region's long-range planning approach, Plan Bay Area 2050+ sharpens and updates strategies to enhance equity, resilience, and effectiveness under changed social, economic, and fiscal conditions.

The strategies included in Plan Bay Area 2050+ were developed through an iterative process that integrated public engagement with performance, equity, and technical analyses supported by regional modeling of transportation, land use, and economic conditions. This work incorporated new data and insights regarding increased remote work, sustained reductions in transit ridership, rising office vacancies, slower population growth, and other shifts that affect travel behavior and land use patterns.

Plan Bay Area 2050+ also recalibrates strategies in response to a significantly more constrained financial environment. Since adoption of Plan Bay Area 2050, anticipated transportation revenues have been reduced by approximately $80 billion, requiring a more disciplined and cost-effective approach to investment. In response, the final plan prioritizes lower-cost, higher-impact actions, including housing strategies designed to reduce per-unit affordable housing construction costs by more than 20 percent, improving feasibility and accelerating delivery.

Transportation strategy refinements include reimagining the region's approach to transit through the coordinated development of Transit 2050+ with the Bay Area's transit operators and other stakeholders. This effort emphasizes safety, service frequency, reliability, and rider-focused improvements that support near-term recovery while preserving flexibility for longer-term system transformation. The final plan also elevates resilience while balancing ambitious, statutorily required climate goals, including through introduction of the region's first Sea Level Rise Resilience Project List developed in collaboration with the Bay Conservation and Development Commission.

Across policy areas, the final plan includes targeted equity-focused refinements, such as enhanced transit safety measures, reduced costs for affordable housing development, and expanded means-based subsidies to support seismic retrofits, climate resilience improvements, and accessibility upgrades. Approximately 34 percent of transportation investments and 46 percent of environmental investments are directed to benefit households with low incomes, who represent about 18 percent of the region's population.

As documented in the Equity and Performance Analysis Reports, these refinements are forecasted to reduce combined housing and transportation cost burdens for households with low incomes by a greater margin than for the average household, while improving access to frequent transit, expanding affordable housing in High-Resource Areas, and enhancing access to jobs, services, and open space.

Statement 3: The final plan incorporates the refined strategies of Transit 2050+ as an equity-focused framework for transforming the region's transit system. Developed in parallel with Plan Bay Area 2050+, Transit 2050+ responds to post-pandemic travel patterns, long-standing accessibility challenges, and a more constrained fiscal environment.

Transit 2050+ was developed through an extensive and iterative process that integrated public and stakeholder input with performance-based analysis and regional modeling of transportation and land use conditions. Through multiple rounds of technical evaluation, the effort identified strategies to address service gaps, improve access to opportunity, and enhance system reliability and safety.

The framework prioritizes improvements to the existing transit system—such as increased frequency, extended service hours, improved reliability, and enhanced safety—while also identifying longer-term capital investments that could be advanced as funding becomes available. Equity outcomes are emphasized through prioritization of investments that benefit Equity Priority Communities and riders most reliant on transit, using performance metrics focused on accessibility, travel time, and connectivity.

Supporting technical analyses indicate that Transit 2050+ strategies are forecasted to improve access to jobs within a reasonable transit travel time and increase overall transit ridership relative to current conditions. These outcomes underscore the role of Transit 2050+ as a central component of the final plan and its ability to advance regional mobility, equity, and climate objectives in a post-pandemic context.

Statement 4: The final plan builds upon local planning efforts by grounding future growth in locally nominated Priority Development Areas and Priority Production Areas, while identifying additional Growth Geographies where necessary to meet regional objectives.

Housing and economic strategies included in the final plan establish a framework for future growth that is informed by engagement with local jurisdictions and supports dual objectives of reducing greenhouse gas emissions and advancing equity through increased access to opportunity. Foundational to this framework are the Plan Bay Area 2050+ Growth Geographies, which were developed over a multi-year period.

Growth Geographies include Priority Development Areas (PDAs) and Priority Production Areas (PPAs), both of which are locally nominated. PDAs prioritize future housing and job growth, while PPAs prioritize growth in middle-wage jobs. Because land use authority resides with local jurisdictions, the partnership demonstrated through nomination of PDAs and PPAs is central to successful implementation of the final plan.

Building on lessons from prior plans - and similar to the approach used in Plan Bay Area 2050 - the final plan recognizes that a broader array of growth areas is needed to accommodate future housing demand and advance equity and climate objectives. Accordingly, where jurisdictions nominated less than 50 percent of eligible land for PDA designation, additional Transit-Rich Areas and High-Resource Areas with basic transit service were identified as Growth Geographies. Sensitive areas, including those subject to unmitigated sea-level-rise impacts or located outside locally adopted growth boundaries, were excluded.

By grounding Growth Geographies in local planning while allowing flexibility to address regional needs, the final plan establishes a growth framework that is more aligned with local conditions and more adaptable than the EIR Alternatives.

Statement 5: The final plan includes a defined and time-bound Implementation Plan that translates policy direction into coordinated actions through 2030.

The Implementation Plan outlines 65 concrete actions across transportation, housing, economy, environment, and cross-cutting elements to advance the strategies included in the final plan. For each action, the Implementation Plan identifies MTC and/or ABAG's recommended role—lead, partner, or support—and evaluates the extent to which MTC and/or ABAG possess the authority, technical capacity, political support, and funding needed to advance implementation.

The Implementation Plan was developed through extensive public and partner engagement over multiple years, including workshops, surveys, and cross-agency collaboration. Input from transit agencies, county transportation agencies, state agencies, community-based organizations, and advocacy groups was incorporated to ensure alignment with regional priorities and implementation realities. The Implementation Plan is presented to the Commission and the Board for approval as part of the final plan.

Statement 6: The final plan improves affordability for Bay Area households and workers by reducing housing and transportation cost burdens and expanding access to affordable housing and reliable transportation options. The final plan establishes a growth framework and suite of strategies that accommodate projected household and employment growth while directly addressing affordability challenges, particularly for households with low incomes.

The final plan advances a coordinated set of housing and transportation strategies that reduce the combined share of household income spent on housing and transportation. These strategies include increasing the production and preservation of deed-restricted affordable housing, strengthening tenant protections, expanding access to frequent transit, and lowering transportation costs through income-based discounts for transit fares and tolls. Together, these actions improve housing stability, increase mobility, and expand access to opportunity across the region.

Performance metrics supporting Plan Bay Area 2050+ indicate that the final plan substantially reduces housing and transportation cost burdens over time. For households with low incomes, the share of income spent on housing and transportation is forecasted to decline from approximately 94 percent in 2023 to 47 percent by 2050. For all households, the combined housing and transportation cost burden is projected to decrease from approximately 42 percent of household income in 2023 to 32 percent by 2050. In addition, the share of deed-restricted affordable housing regionwide is projected to increase significantly under the final plan's housing strategies.

The final plan further improves affordability by increasing access to frequent transit and reducing reliance on higher-cost travel modes. Complementary strategies, including income-based discount programs and workforce development initiatives, further support economic mobility and financial stability for households with low incomes.

Statement 7: The final plan strengthens regional connectivity by advancing a coordinated, safe, and multimodal transportation network that improves access to jobs, services, and opportunity for Bay Area residents. Through integrated transportation, housing, and economic strategies, the final plan focuses growth and investment in ways that improve mobility, expand access to frequent transit, and reduce reliance on driving.

The final plan concentrates housing and job growth near frequent transit and prioritizes transportation investments that improve system performance and fill gaps in the regional network. By 2050, the share of Bay Area households living within one-half mile of frequent transit service is projected to increase substantially, expanding access to public transportation and improving mobility across the region. Targeted investments emphasize increased transit frequency and reliability, selective rail, ferry, and bus service expansions, and improvements to active transportation infrastructure to support biking and walking.

As reflected in the plan's performance metrics, these strategies improve access to economic opportunity and support shifts toward more sustainable travel modes. By 2050, the share of jobs accessible within a 45 minute transit trip increases from 3.5% to 5.4%—a 1.9 percentage point gain, representing roughly 54% growth for all residents. The share of people commuting by transit, biking, or walking is forecasted to increase significantly, while the share of commuters driving alone is projected to decline relative to conditions without the final plan.

The final plan also advances freeway reliability, safety, and emissions reduction objectives through coordinated operational strategies, including all-lane tolling and speed management on freeways and local roads. Together, these strategies are intended to stabilize travel times on key corridors despite population growth and reduce per-capita rates of traffic fatalities and serious injuries, contributing to a safer and more efficient transportation system.

Statement 8: The final plan supports a more diverse and inclusive Bay Area by expanding access to housing, transportation, and environmental resources and by reducing displacement pressures for historically underserved communities. Informed by public engagement that prioritized voices from Equity Priority Communities and supported by equity-focused analysis, the final plan advances strategies intended to ensure that people of all backgrounds, abilities, and ages can remain in place and access opportunity throughout the region.

The final plan advances housing strategies that expand opportunities for households with low incomes while reducing the risk of displacement and exclusion. These strategies include increasing the production and preservation of affordable housing, strengthening renter protections, expanding affordable housing opportunities in High-Resource Areas and Transit-Rich Areas, and providing targeted assistance such as mortgage down-payment support for households with low incomes in Equity Priority Communities. Together,

these actions broaden access to homeownership and housing stability and support long-term economic mobility for populations that have historically faced barriers to opportunity.

Environmental and resilience strategies further support diversity by reducing the displacement impacts of climate-related hazards. The final plan includes means-based assistance to retrofit older housing to better withstand risks such as earthquakes and wildfires, helping to protect existing residents and preserve the region's housing stock, particularly in vulnerable communities.

Performance metrics supporting Plan Bay Area 2050+ indicate that these strategies improve diversity-related outcomes over time. By 2050, the homeownership rate for households with low incomes is projected to increase, reflecting expanded access to affordable housing and wealth-building opportunities. Investments targeted to Equity Priority Communities improve access to transportation, housing, and environmental resources, while expanded affordable housing opportunities in High-Resource Areas support a more inclusive regional growth pattern.

Statement 9: The final plan improves regional health by conserving natural resources, expanding access to open space, improving air quality, reducing climate emissions, and protecting residents from environmental hazards. Through integrated land use, transportation, housing, and environmental strategies, the final plan advances a healthier Bay Area while addressing climate risks and long-standing disparities in environmental conditions.

The final plan establishes a growth framework and suite of land use and transportation strategies that concentrates growth within the existing urbanized footprint defined by locally adopted urban growth boundaries. This transit-supportive development pattern, combined with investments in transit service, active transportation infrastructure, and clean vehicle initiatives, reduces vehicle travel, lowers greenhouse gas emissions, and improves regional air quality. Expanded pedestrian and bicycle infrastructure further supports active transportation, promoting healthier travel choices and reducing dependence on driving.

The final plan also advances environmental and resilience strategies that protect residents from climate-related risks and other hazards. Investments in residential and public building retrofits improve energy efficiency while reducing vulnerability to earthquakes and wildfires. Adaptation strategies addressing sea-level rise, flooding, and extreme heat are designed to protect nearly all homes in areas subject to these risks by mid-century, strengthening community safety and long-term resilience.

Performance metrics supporting Plan Bay Area 2050+ indicate that these strategies result in measurable health-related improvements over time. By 2050, publicly accessible open space per capita is projected to increase substantially, expanding opportunities for recreation and supporting physical and mental health. Building retrofit strategies are forecasted to reduce exposure to wildfire and earthquake risks by approximately 25 to 50 percent, while climate strategies are projected to exceed the state's greenhouse gas reduction target, contributing to improved air quality and environmental conditions.

The final plan further advances health equity by prioritizing investments in urban parks, green spaces, and environmental protections in Equity Priority Communities, where access to open space and environmental amenities has historically been lower.

Statement 10: The final plan supports a more vibrant Bay Area by strengthening economic productivity, revitalizing job centers and downtowns, and expanding access to employment, cultural, and recreational opportunities. Through coordinated economic, housing, and transportation strategies, the final plan advances long-term regional prosperity while improving how that prosperity is shared across communities.

The final plan includes strategies to support the recovery and long-term vitality of the Bay Area's three largest downtowns—Oakland, San Francisco and San Jose. The plan's strategies are projected to result in greater

increases in workers, visitors, and residents on a typical weekday in these downtowns than in the region as a whole. The plan strategies also lead to a greater share of new jobs and housing in areas well served by transit, encouraging growth in locations with strong transportation access. Together, these strategies support shorter commutes, reduce pressure on congested transportation networks, and improve access to jobs for workers throughout the Bay Area.

Complementary economic strategies support upward economic mobility through job training, workforce development, and business incubator programs, particularly in Priority Production Areas, accelerating growth in middle-wage industries across the region.

Performance metrics supporting Plan Bay Area 2050+ indicate that these strategies strengthen regional economic vitality over time. By 2050, economic output per person is projected to increase substantially, reflecting improved productivity and recovery of high-growth industries.

Statement 11: The final plan meets and exceeds state requirements established in Senate Bill 375 by reducing per capita greenhouse gas emissions and providing sufficient housing for all economic segments of the population. Through an integrated set of land use, transportation, housing, and climate strategies, the final plan advances regional climate goals while supporting inclusive and sustainable growth.

Implementation of the final plan reduces per capita greenhouse gas emissions from cars and light-duty trucks beyond the targets established by the California Air Resources Board. By 2035, per capita emissions are projected to decline by approximately 21 percent, exceeding the state-mandated reduction target of 19 percent. These reductions are achieved through coordinated strategies that focus growth in walkable, mixed-income communities near frequent transit; manage highway demand through pricing and operational strategies; expand and integrate the regional transit network; and invest in electric vehicles, charging infrastructure, and other climate initiatives.

The final plan also provides for housing at all income levels to accommodate projected population and employment growth. The regional growth forecast incorporated into the final plan supports development of approximately one million new housing units by 2050, ensuring sufficient capacity to house the region's workforce and reduce reliance on in-commuting from outside the Bay Area. Housing strategies emphasize both production and preservation of affordable housing, mitigation of displacement impacts, and provision of replacement housing where required, consistent with state law and adopted legal commitments.

Conclusion

In summary, MTC and ABAG find that the final plan best represents the consensus developed through three years of engagement, holistically advances equity and affordability, balances the needs of users of all forms of transportation, advances environmental sustainability and resilience goals, and promotes shared prosperity regionwide. The final plan achieves all this while also accommodating the region's forecasted growth and exceeding the per capita passenger vehicle and light truck CO_2 emission reduction targets established by CARB for the San Francisco Bay Area pursuant to SB 375. Therefore, based upon the vision and objectives identified in the final plan and the Final EIR, following extensive public participation and testimony, and notwithstanding the impacts identified in the Final EIR as being potentially significant and which arguably may not be avoided, lessened, or mitigated to a level of insignificance, MTC and ABAG, acting pursuant to Public Resources Code Section 21081 and Section 15093 of the State CEQA Guidelines, hereby determine that specific economic, legal, social, environmental, technological and other benefits and overriding considerations of the final plan sufficiently outweigh any remaining unavoidable, adverse environmental impacts of the final plan and that the final plan should be approved.

In reaching this conclusion and approving the final plan:

1. MTC and ABAG have considered the information contained in the Final EIR and fully reviewed and considered all of the public testimony, documentation, exhibits, reports, and presentations included in the record of these proceedings. MTC and ABAG specifically find and determine that this Statement of Overriding Considerations is based upon and supported by substantial evidence in the record.
2. MTC and ABAG have carefully weighed the benefits of the final plan against any adverse impacts identified in the Final EIR that could not be feasibly mitigated to a level of insignificance. While MTC and ABAG have required all feasible mitigation measures, some impacts remain potentially significant.
3. MTC and ABAG have made reasonable and good faith efforts to eliminate or substantially mitigate the potential impacts resulting from the Plan.
4. MTC and ABGA find that any residual or remaining effects on the environment resulting from adoption and implementation of the Plan and related actions are acceptable due to the benefits set forth in this Statement of Overriding Considerations.
5. This Statement of Overriding Considerations applies specifically to those impacts found to be potentially significant and unavoidable as set forth in the Final EIR and the record of these proceedings.

4 INDEPENDENT REVIEW AND ANALYSIS

Under Public Resources Code Section 21082.1, subdivision (c), the lead agency must: (1) independently review and analyze the EIR; (2) circulate draft documents that reflect its independent judgment; and (3) as part of the certification of an EIR, find that the EIR reflects the independent judgment of the lead agency.

The Commission and Board hereby certify that the EIR was prepared, published, circulated and reviewed in accordance with the requirements of CEQA and the State CEQA Guidelines, and constitutes an adequate, accurate, objective and complete Final Environmental Impact Report in full compliance with the requirements of CEQA and the State CEQA Guidelines.

The Commission and Board have independently reviewed the EIR and have considered the information contained in the EIR. The EIR reflects the Commission's/Board's independent judgment and analysis.

5 RECORD OF PROCEEDINGS

In accordance with Public Resources Code Section 21167.6, subdivision (e), the record of proceedings for the Commission's/Board's EIR, findings, alternatives analysis, and ultimate decision on the Plan includes the documents identified below.

- The NOP for the preparation of the Draft EIR;
- Public notices issued by MTC and ABAG in conjunction with the final plan;
- All comments submitted by agencies or members of the public during the comment period on the NOP;
- Draft Environmental Impact Report for Plan Bay Area 2050+, October 2025 (includes all appendices);
- Final Environmental Impact Report for Plan Bay Area 2050+, March 2026 (includes all appendices);
- Plan Bay Area 2050+, March 2026 and all supporting supplemental reports, including:
    - Equity Analysis Report

  - Engagement Report
  - Forecasting and Modeling Report
  - Implementation Plan Report
  - Native American Tribal Outreach Report
  - Performance Report
  - Resilience Project List Report
  - Statutorily Required Plan Maps
  - Technical Assumptions Report
  - Transit 2050+ Report
  - Transportation-Air Quality Conformity Report
  - Transportation Project List Report
- Any minutes and/or verbatim transcripts of all information sessions, public meetings, and public hearings held by MTC or ABAG in connection with the Plan;
- Any documentary or other evidence submitted to MTC and ABAG at such information sessions, public meetings, and public hearings;
- Any staff reports presented to MTC and ABAG, including attachments and presentation materials;
- Any and all resolutions adopted by MTC and ABAG regarding the Plan, and all staff reports, analyses, and summaries related to the adoption of those resolutions;
- Any correspondence between MTC and ABAG and ARB regarding the final plan, including but not limited to, MTC's Technical Methodology to Estimate Greenhouse Gas Emissions from the final plan;
- Matters of common knowledge to MTC and ABAG, including, but not limited to federal, state, and local laws and regulations;
- Any documents expressly cited in these findings, in addition to those cited above; and
- Any other materials required for the record of proceedings by Public Resources Code Section 21167.6, subdivision (e).

The documents constituting the record of proceedings are available for review by responsible agencies and interested members of the public by appointment during normal business hours at the offices of the Metropolitan Transportation Commission, 375 Beale Street, Suite 800, San Francisco, California 94105. The custodian of these documents is MTC's Public Information Officer.

Mitigation Monitoring and Reporting Program

for

PLAN BAY AREA 2050+

Regional Transportation Plan (RTP)/ Sustainable Communities Strategy (SCS)

State Clearinghouse Number SCH# 2025010348

Prepared for:

Metropolitan Transportation Commission
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and

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March 2026

INTRODUCTION

This document constitutes the Mitigation Monitoring and Reporting Program (MMRP) for the Environmental Impact Report (EIR) on the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG) Plan Bay Area (PBA) 2050+, the regional plan for transportation, housing, the economy, and the environment. PBA 2050+ serves as the Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) for the nine county Bay Area.

The California Environmental Quality Act (CEQA) requires public agencies to report on and monitor measures adopted as part of the environmental review process (Public Resources Code section 21081.6 and CEQA Guidelines sections 15091(d) and 15097). This MMRP is designed to fulfill that requirement.

This MMRP is designed to ensure that the measures identified in the EIR are fully implemented. The MMRP describes the actions that must take place as a part of each measure, the timing of these actions, the entity responsible for implementation, and the agency responsible for enforcing each action. The implementation and monitoring responsibilities, as described in this MMRP, reflect the role of local agencies in making project-level determinations regarding the applicability and feasibility of particular measures based on project-specific circumstances.

As required by Section 21081.6(a)(2) of the Public Resources Code, the MTC and ABAG "custodian of documents and other material" which constitutes the "record of proceedings" upon which the decision to adopt the PBA 2050+ is based is identified below.

MTC/ABAG Public Information
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, California, 94105
(415) 778-5262

The physical location of this information is:

Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

SUMMARY OF THE MITIGATION MONITORING AND REPORTING PROGRAM

To assist implementation of the mitigation measures, Table A-1 includes the following information:

Mitigation Measure X.X-X(x): The mitigation measures are taken verbatim from the Final EIR

Mitigation Monitoring:

- **Timing**. This section specifies the point by which the measure should be completed.
- **Implementation of Measure**. This section describes how the mitigation measure is to be implemented and/or verified.
- **Oversite Responsibility**. This section indicates which entity will oversee implementation of the measure, conduct the actual monitoring and reporting, and take corrective actions when a measure has not been properly implemented.
- **Implementation Responsibility**. This section identifies the entity that will undertake the required action.

Pursuant to Public Resources Code Sections 21155.2(a) and (b)(2) and Section 21159.28(a), in order to take advantage of CEQA streamlining benefits allowed under Senate Bill 375, projects that seek to tier from the PBA 2050+ EIR must incorporate the mitigation measures identified in this MMRP or, if the identified mitigation is found to be infeasible based on substantial evidence, the project must incorporate equivalent measures that avoid or mitigate potential impacts of the project to a less-than-significant level.

Table A-1: Summary of Impacts and Mitigation Measures

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
3.2 Aesthetics and Visual Resources				
Mitigation Measure AES-1: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity. ◢ Site or design projects to minimize their intrusion into important viewsheds. Measures to achieve this could include, but are not limited to, requiring that the scale and massing of new development in higher-density areas provide appropriate transitions in building height and bulk that are sensitive to the physical and visual character of adjoining neighborhoods that have lower development intensities and building heights, and ensuring building heights are stepped back from sensitive adjoining uses to maintain appropriate transitions in scale and to protect scenic vistas and scenic resources. ◢ Design projects to minimize the potential to obscure, detract from, or negatively affect the quality of views from state-designated scenic roadways or scenic highways. ◢ Use see-through safety barrier designs (e.g., railings rather than walls). ◢ Develop interchanges and transit lines at the grade of the surrounding land to limit view blockage. ◢ Where highway screening is a required element of a development, design landscaping along all highways, including state-designated scenic highways, locally designated scenic highways, and highway corridors in rural and open space areas to add natural elements and visual interest to soften the hard-edged, linear travel experience that would otherwise occur. Retain or replace trees bordering highways so that clear-cutting is not evident. ◢ Identify, preserve, and enhance scenic vistas to and from hillside areas and other visual resources.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AES-1 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant.

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure AES-2: Implement Mitigation Measure AES-1.	Same as specified for Mitigation Measure AES-1, above.	Same as specified for Mitigation Measure AES-1, above.	Same as specified for Mitigation Measure AES-1, above.	Same as specified for Mitigation Measure AES-1, above.
Mitigation Measure AES-3: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Require that the scale, massing, and design of new development provide appropriate transitions in building height, bulk, and architectural style that are sensitive to the physical and visual character of surrounding areas. ◢ Contour the edges of major cut and fill slopes to provide a finished profile that is appropriate to the surrounding context, using shapes, textures, colors, and scale to minimize contrasts between the project and surrounding areas. ◢ Require project sponsors to conduct shadow studies for four-story high (and higher) buildings and roadway facilities to identify and implement development strategies for reducing the impact of shadows on public open space, where feasible. Study considerations shall include, but are not limited to, the placement, massing, and height of structures, surrounding land uses, time of day and seasonal variation, and reflectivity of materials. Study recommendations for reducing shadow impacts shall be incorporated into the project design as feasible based on project- and site-specific considerations.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AES-3 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure AES-4: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Design projects to minimize light and glare from lights, buildings, and roadways facilities. ◢ Minimize and control glare from transportation projects through the adoption of project design features that reduce glare. These features include: ◤ planting trees along transportation corridors to reduce glare from the sun; ◤ landscaping off-street parking areas, loading areas, and service areas; and ◤ shielding transportation lighting fixtures to minimize off-site light trespass.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AES-4 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Minimize and control glare from land use and transportation projects through the adoption of project design features that reduce glare. These features include: ◤ limiting the use of reflective materials, such as metal; ◤ using non-reflective material, such as paint, vegetative screening, matte finish coatings, and masonry; ◤ screening parking areas by using vegetation or trees; and ◤ using low-reflective glass. ◢ Impose lighting standards that ensure that minimum safety and security needs are addressed and minimize light trespass and glare associated with land use development. These standards include the following: ◤ minimizing incidental spillover of light onto adjacent private properties and undeveloped open space; ◤ directing luminaries away from habitat and open space areas adjacent to the project site; ◤ installing luminaries that provide good color rendering and natural light qualities; and ◤ minimizing the potential for sky glow into the nighttime sky and for incidental spillover of light onto adjacent private properties and undeveloped open space.				
3.3 Agricultural and Forestry Resources				
Mitigation Measure AGF-1: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ Require project relocation or corridor realignment, where feasible, to avoid agricultural land, especially Prime Farmland, Farmland of Statewide Significance, Unique Farmland, and land under a Williamson Act contract. ◢ Provide buffers, berms, setbacks, fencing, or other project design measures to protect surrounding agriculture, and to reduce conflict with farming that could result from implementation of transportation projects and/or the projected land use growth footprint included as a part of the RTP/SCS. ◢ Maintain and expand agricultural land protections such as urban growth boundaries.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AGF-1 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Achieve compensatory mitigation in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by the permitting agencies. ◢ Require acquisition of conservation easements on land in the same jurisdiction, if feasible, and at least equal in quality and size as mitigation for the loss of agricultural land. ◢ Institute new protection of farmland in the project area or elsewhere through the use of long-term restrictions on use, such as 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.) or 10-year Williamson Act contracts (Government Code Section 51200 et seq.).				
Mitigation Measure AGF-2: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ Require project relocation or corridor realignment, where feasible, to avoid land zoned for forest land or timberland. ◢ Maintain and expand forest land protections such as urban growth boundaries. ◢ Achieve compensatory mitigation in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning, as deemed appropriate by the permitting agencies. ◢ Require acquisition of conservation easements on land at least equal in quality and size as mitigation for the loss of forest land or timberland.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AGF-2 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure AGF-3: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ Implement Mitigation Measures AGF-1 and AGF-2. ◢ Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AGF-3 into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations. ◢ Design project features to minimize fragmenting or isolating agricultural land. Where a project involves acquiring land or easements, ensure that the remaining agricultural land is of a size sufficient to allow economically viable farming operations. The project sponsors shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.		inclusion in construction contracts.		
3.4 Air Quality				
Mitigation Measure AQ-2: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable to reduce impacts to a less-than-significant level based on project- and site-specific considerations, that include those identified below: When applicable screening levels set by the relevant air district are exceeded, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable to reduce impacts to a less-than-significant level based on project- and site-specific considerations, that include those (or equally effective measures) identified below: **Construction Best Practices for Exhaust** ◢ The applicant or general contractor for the project shall submit a list of all off-road equipment greater than 25 horsepower (hp) that would be operated for more than 20 hours over the entire duration of project construction, including equipment from subcontractors, to the relevant air district (e.g., the Bay Area Air District, NSCAPCD, or YSAQMD) for review and certification. The list shall include all information necessary to ensure the equipment meets the following requirements: ◤ Equipment shall be zero emission or have engines that meet or exceed either EPA or CARB Tier 4 off-road emission standards, and it shall have engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS), if one is available for the equipment being used. Equipment with engines that meet Tier 4 Interim or Tier 4 Final emission standards automatically meet this requirement; therefore, a VDECS would not be required.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AQ-2 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◤ Idling time of diesel-powered construction equipment and trucks shall be limited to no more than 2 minutes. Clear signage of this idling restriction shall be provided for construction workers at all access points. ◤ All construction equipment shall be maintained and properly tuned in accordance with the manufacturers' specifications. ◤ Portable diesel generators shall be prohibited. Grid power electricity should be used to provide power at construction sites, or propane and natural gas generators may be used when grid power electricity is not feasible. ◤ Current certificate(s) of compliance with CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation (CCR, Title 13, Sections 2449 and 2449.1) shall be provided. **Construction Best Practices for Entrained Dust** ◢ All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. For projects over 5 acres in size, soil moisture should be maintained at a minimum of 12%. Moisture content can be verified by lab samples or a moisture probe. ◢ All haul trucks transporting soil, sand, or other loose material off-site shall be covered. ◢ All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. Dry power sweeping should only be performed in conjunction with thorough watering of the subject roads. ◢ All vehicle speeds on unpaved roads and surfaces shall be limited to 15 miles per hour (mph). ◢ All roadway, driveway, and sidewalk paving shall be completed as soon as possible. Building pads shall be paved as soon as possible after grading. ◢ All construction sites shall provide a posted sign visible to the public with the telephone number and person to contact at the lead agency regarding dust complaints. The recommended response time for corrective action shall be within 48 hours. The Bay Area Air District's Complaint Line (1.800.334.6367) shall also be included on posted signs to ensure compliance with applicable regulations. ◢ All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50% air porosity. ◢ Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. ◢ The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. ◢ All trucks and equipment, including their tires, shall be washed off before leaving the site. ◢ Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel. ◢ Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than 1%. ◢ Hydroseed or apply nontoxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days. ◢ Minimize the amount of excavated material or waste materials stored at the site. Applicable mitigation measures shall be required at the time grading permits are issued.				
Mitigation Measure AQ-3(a): MTC and ABAG, in partnership with the local air districts and implementing agencies, shall work together to support the use of existing air quality and transportation funds and seek additional funds to continue to implement the Bay Area Air District, NSCAPCD, YSAQMD, and CARB programs (e.g., Carl Moyer Program) intended to retrofit and replace trucks and locomotives.	Following plan approval.	Continue implementing projects related to retrofits and replacement of trucks and locomotives and develop strategies to seek additional funding to implement BAAQMD and California Air Resources Board (ARB) programs related to retrofits and replacement of trucks and locomotives.	MTC, ABAG, local air district	MTC, ABAG, local air districts

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure AQ-3(b): MTC and ABAG, in partnership with the local air districts and the Port of Oakland, and other agency partners, shall work together to secure incentive funding to reduce mobile PM emissions from mobile exhaust and entrained PM sources, such as tire wear, brake wear, and roadway dust.	Following plan approval.	Develop strategies to secure additional funding to reduce mobile particulate matter (PM) emissions from mobile exhaust and entrained PM sources.	MTC, ABAG, local air districts, Port of Oakland	MTC, ABAG, local air districts, Port of Oakland
Mitigation Measure AQ-3(c): MTC and ABAG, in partnership with local air districts, and implementing agencies shall: ◢ support the advancement of corridor-level plans and implementation of projects located on severely congested (LOS F) facilities, and ◢ incorporate transportation demand management (TDM) strategies into individual land use land transportation projects and plans, as part of the planning process; TDM strategies could include ridesharing, carsharing, telecommuting, adopting flexible working hours, implementing parking management and traffic-calming measures, and marketing TDM options (especially alternative commuting services).	Following plan approval. This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	Continue developing and implementing projects related to corridor-level plans on severely congested facilities. If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AQ-3(c) into project-specific design plans or environmental review including possible inclusion in construction contracts.	MTC, ABAG Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	MTC, ABAG Implementing/ lead agency and/or project applicant.
Mitigation Measure AQ-3(d): When applicable screening levels set by the applicable air district are exceeded for a specific project, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below or are updated by the applicable air district or within CalEEMod: ◢ use of energy-efficient lighting and process systems (e.g., low-NOX water heaters and boiler units); ◢ design streets to maximize pedestrian access to transit stops;	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AQ-3(d) into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ include bus shelters at transit access points where deemed appropriate by local public transit operator in large residential, commercial, and industrial projects; ◢ equip residential structures with electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment; ◢ provide for, or contribute to, dedication of land for off-site Class I and Class II bicycle facilities linking the project to designated bicycle commuting routes in accordance with the regional bikeway master plan; ◢ contribute to the provision of synchronized traffic signals on roadways affected by the project and as deemed necessary by the local public works department; ◢ provide transit-enhancing infrastructure that includes bus turnouts or bulbs, passenger benches, street lighting, route signs and displays, and shelters as demand and service routes warrant, subject to review and approval by local transportation planning agencies; ◢ provide pedestrian-enhancing infrastructure that includes sidewalks and pedestrian paths, direct pedestrian connections, street trees to shade sidewalks, pedestrian safety designs and infrastructure, street furniture and artwork, street lighting, pedestrian signalization and signage, and/or access between bus service and major transportation points within the project; ◢ include neighborhood park(s) or other recreational options, such as trails, within the development to minimize vehicle travel to off-site recreational and/or commercial uses; ◢ install solar water heaters; ◢ incorporate mixed uses, where permitted by local development regulations, to achieve a balance of commercial, employment, and housing options on the project site; ◢ contribute to traffic-flow improvements (e.g., right-of-way, capital improvements) that reduce traffic congestion and do not substantially increase roadway capacity; ◢ provide preferential parking spaces for carpool and vanpool vehicles, implement parking fees for single-occupancy vehicle commuters, and implement parking cash-out program for employees; ◢ use clean fuel vehicles in the vehicle fleet; ◢ require all employment centers to include an adequate number of on-site shower/locker facilities for bicycling and pedestrian commuters (typically one shower and three lockers for every 25 employees per shift);		inclusion in construction contracts.		

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ construct/contribute to bicycle and pedestrian facility improvements; ◢ provide ancillary services (e.g., cafeterias, health clubs, automatic tellers, and post offices) within walking distance of proposed development (no further than 1,500 feet) as appropriate and in compliance with local development regulations; ◢ provide park-and-ride lots as deemed feasible and appropriate by transportation planning agencies; ◢ employment centers that exceed a designated size, as measured by the number of employees, shall provide on-site child care and after-school facilities or contribute to off-site construction of such facilities within walking distance of employment land uses (for employment centers on or adjacent to industrial land uses, on-site child daycare centers shall be provided only if supported by the findings of a comprehensive HRA performed in consultation with the local air district); ◢ provide on-site pedestrian facility enhancements, such as walkways, benches, proper lighting, vending machines, and building access that are physically separated from parking lot traffic; ◢ offer alternative work schedules, where practical, that allow for work hours that are compressed into fewer than 5 days (e.g., 9/80, 4/40, or 3/36 schedules), or allow flextime schedules; ◢ provide transit amenities (e.g., on-site and off-site bus turnouts, passenger benches, or shelters) where deemed appropriate by local transportation planning agencies; ◢ contribute to the provision of synchronized traffic signals on roadways affected by the proposed project and as deemed necessary by the local public works department; ◢ provide video conferencing facilities; ◢ commit to support programs that include guaranteed ride home, subsidized transit passes, and rideshare matching; ◢ provide transportation (e.g., shuttles) to major transit stations and multimodal centers; ◢ require each employer employment center (more than 25 employees) to assign a transportation coordinator for the applicable transportation management association (TMA); ◢ require all employers to install a permanent display in employee common areas of alternate transit information, as determined by the requirements of the TMA;				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ require employers or employment centers (more than 25 employees) to implement a guaranteed ride home program; ◢ require employers or employment centers (more than 25 employees) to implement an incentive program for riding transit, carpooling, vanpooling, biking, and walking instead of driving a single-occupancy vehicle to work, and design and locate buildings to facilitate transit access; ◢ install Energy Star (or equivalent) cool roofing systems on all buildings; ◢ design shuttle and transit exits to adjoining streets to reduce time to reenter traffic from the project site; ◢ increase wall and attic insulation to 20% above Title 24 requirements (residential and commercial); ◢ orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial); ◢ provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways; ◢ include passive solar cooling and heating features in designs, as well as ceiling and whole house fans; ◢ include programmable thermostats in the design of heating and cooling systems; and ◢ use day lighting systems, such as skylights, light shelves, and interior transom windows. See also Chapter 3, "Measures to Reduce GHG Emissions," in CAPCOA's *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* (CAPCOA Handbook) for additional reduction measures (CAPCOA 2024). Although the CAPCOA Handbook focuses on GHG reduction measures, co-benefits of many measures include criteria pollutant emission reductions. Future project proponents shall use the CAPCOA Handbook to develop measures to reduce emissions to below thresholds if significant impacts are identified.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure AQ-3(e): Implementing agencies and/or project sponsors shall implement the following measures, where feasible and as applicable to reduce impacts to a less-than-significant level based on project- and site-specific considerations, to reduce criteria air pollutant emitted by natural gas combustion in buildings: ◢ Prohibit natural gas infrastructure in new development. ◢ Use, or design to support, microgrid electric systems to facilitate the resiliency of new developments prohibiting natural gas. ◢ Equip residential structures containing front and rear yard area with electric outlets in the front and rear of the structure to facilitate use of electrical lawn and garden equipment. ◢ Install ground-source heat pumps, solar, or other alternatively-fueled water heaters instead of natural gas or grid-based electric water heaters. ◢ Install ground-source heat pump, or other alternative, heating and cooling systems. ◢ Increase wall and attic insulation to 20% above Title 24 requirements (residential and commercial). ◢ Orient buildings to take advantage of solar heating and natural cooling, and use passive solar designs (residential, commercial, and industrial). ◢ Provide energy-efficient windows (double pane and/or Low-E) and awnings or other shading mechanisms for windows, porches, patios, and walkways. ◢ Use passive solar cooling and heating designs, ceiling and whole house fans, and programmable thermostats in the design of heating and cooling systems.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AQ-3(e) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Implement Mitigation Measure AQ-2. **Mitigation Measure AQ-4(a)**: When locating sensitive receptors in TAC risk areas, as identified in **Figure 3.4-1**, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ Install, operate and maintain in good working order a central heating, ventilation, and air conditioning (HVAC) system or other air intake system in the building, or in each individual unit, that meets or exceeds a minimum efficiency reporting value (MERV) of 13 (MERV-16 for projects located in the West Oakland Specific Plan area) or higher (BAAQMD 2016). The HVAC system shall include the following features: installation of a high-efficiency filter and/or carbon filter	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AQ-4(a) into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
to filter particulates and other chemical matter from entering the building; either high-efficiency particulate air (HEPA) filters or American Society of Heating, Refrigeration, and Air-Conditioning Engineers (ASHRAE) certified 85% supply filters shall be used. ◢ Reduce emissions from diesel trucks through implementing the following measures, if feasible: ◤ installing electrical hook-ups for diesel trucks at loading docks; ◤ requiring trucks to use transportation refrigeration units that meet Tier 4 emission standards; ◤ requiring truck-intensive projects to use advanced exhaust technology (e.g., hybrid) or alternative fuels; ◤ prohibiting trucks from idling for more than 2 minutes; ◤ establishing truck routes to avoid sensitive receptors in the project; and ◤ implementing a truck route program, along with truck calming, parking, and delivery restrictions. ◢ Install passive electrostatic filtering systems with low air velocities (i.e., less than 1 mph). ◢ Phase residential developments when proposed within 500 feet of freeways such that homes nearest the freeway are built last, if feasible. ◢ Locate sensitive receptors as far away from truck activity areas, such as loading docks and delivery areas, as feasible. ◢ Ensure that existing and new standby or emergency diesel generators meet CARB's Tier 4 emission standards, if feasible. ◢ Locate individual and common exterior open space and outdoor activity areas proposed as part of individual projects as far away as possible from emission source within the project site boundary, face them away major freeways, and shield them from the source (i.e., the roadway) of air pollution with buildings or otherwise buffer them to further reduce air pollution for project occupants. ◢ Locate air intakes and design windows to reduce PM exposure (e.g., windows nearest to the roadway do not open). ◢ If sensitive receptors are located near a distribution center, do not locate residents immediately adjacent to a loading dock or where trucks concentrate to deliver goods. ◢ Locate sensitive receptors in buildings in areas upwind of major roadway traffic to reduce exposure to reduce cancer risk levels and exposure to PM2.5.		inclusion in construction contracts.		

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Plant trees and/or vegetation between sensitive receptors and pollution source. Trees that are best suited to trapping PM shall be planted, including one or more of the following species: pine (*Pinus nigra var. maritima*), cypress (*x Cupressocyparis leylandii*), hybrid popular (*Populus deltoids x trichocarpa*), California pepper tree (*Schinus molle*), and redwood (*Sequoia sempervirens*). ◢ Reduce emissions from diesel trucks by establishing truck routes to avoid residential neighborhoods or other land uses serving sensitive populations, such as hospitals, schools, and child care centers. A truck route program, along with truck calming, parking and delivery restrictions, shall be implemented to direct traffic activity at non-permitted sources and large construction projects. These measures are consistent with recommendations in the Bay Area Air District's CEQA Guidelines (BAAQMD 2023a) and Planning Healthy Places (BAAQMD 2016).				
Mitigation Measure AQ-4(b): MTC and ABAG shall partner with the Bay Area Air District and local lead agencies to develop a program to install air filtration devices in existing residential buildings, and other buildings with sensitive receptors, located near freeways or sources of TACs and $PM_{2.5}$.	Following plan approval.	MTC, ABAG, BAAQMD, and local agencies develop a program, per Mitigation Measure AQ-4(b).	MTC, ABAG, Bay Area Air District	MTC, ABAG, Bay Area Air District
Mitigation Measure AQ-4(c): MTC and ABAG shall partner with the Bay Area Air District to develop a program to provide incentives to replace older locomotives and trucks in the region to reduce TACs and $PM_{2.5}$.	Following plan approval.	MTC, ABAG, BAAQMD, and local agencies develop a program, per Mitigation Measure AQ-4(c).	MTC, ABAG, Bay Area Air District	MTC, ABAG, Bay Area Air District
Mitigation Measure AQ-4(d): The implementing agency shall implement the strategies identified in the CARB Technical Advisory to reduce air pollution exposure near high-volume roadways to less-than-significant levels, where feasible. Examples of effective strategies include (CARB 2017): ◢ using speed reduction mechanisms, such as roundabouts to reduce the frequency of stop-and-go driving common among streets that support stop signs; ◢ using traffic signal management to limit the frequency of stop-and-go driving and vehicle idling; ◢ establishing and enforcing speed limit reductions of high-speed roadways;	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure AQ-4(d) into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ using design elements that promote air flow and pollutant dispersion along street corridors to optimize air flow, building downwash, and pollution dispersal; ◢ incorporating bike lanes and sidewalks to promote alternative, zero-pollution modes of transportation; and ◢ constructing solid barriers directly adjacent to high-volume roadways, such as sound walls to improve downwash.		inclusion in construction contracts.		
3.5 Biological Resources				
Mitigation Measure BIO-(1a): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Implementing agencies shall require project sponsors to prepare biological resource assessments for specific projects proposed in areas known or likely to contain habitat suitable for special-status plants and wildlife, such as sites that are not surrounded by urban development and/or have not been previously disturbed or developed. The assessment shall be conducted by qualified professionals pursuant to adopted protocols and agency guidelines, where applicable. Where the biological resource assessments establish that mitigation is required to avoid and minimize direct and indirect adverse effects on special-status plant and wildlife species, or compensate for unavoidable effects, mitigation shall be developed consistent with the requirements or standards of CEQA, USFWS, CDFW, and local regulations and guidelines, in addition to requirements of any applicable and adopted HCP/NCCP or other applicable plans developed to protect species or habitat. ◢ For proposed plan projects subject to CEQA or NEPA, or subject to permitting processes and review by CDFW, USFWS, and NOAA Fisheries, pre-project biological surveys shall be conducted as part of the CEQA/NEPA process to determine the presence and extent of sensitive habitats and species in the project vicinity. Surveys shall follow established methods and shall be conducted at times when the subject species is most likely to be identified. In cases where impacts on State- or federally listed plant or wildlife species are possible, formal protocol-level surveys may be required on a species-by-species basis to determine the local presence and distribution of these species. Coordination with CDFW, USFWS, and NOAA Fisheries, as appropriate, shall be conducted early in the planning process at an informal level for projects that could adversely affect federal or State candidate, proposed, threatened, or	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure BIO-1(a) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
endangered species to determine the need for consultation or permitting actions. Projects shall obtain incidental take authorization from the permitting agencies, as required, before project implementation. ◢ A species and habitat compensation plan shall be prepared and implemented for unavoidable direct impacts on special-status plant species and shall be reviewed and approved by the resource agencies and lead agency prior to project approval. The plan shall identify effective methods for reestablishing the affected species and habitat, including but not limited to seed collection, salvage of root masses, and planting seeds and/or root masses in an area with suitable conditions. The plan shall also specify a monitoring program designed to evaluate success in reestablishing the affected species and habitat, and remedial measures that shall be followed if the project is not meeting specified performance criteria. The monitoring program shall be designed and implemented to evaluate the current and probable future health of the resources, and their ability to sustain populations in keeping with natural populations following the completion of the program. Remedial measures are highly dependent upon the species and habitats in question, but generally shall include but not be limited to invasive species management, predator control, access control, replanting and reseeding of appropriate habitat elements, regarding, and propagation and seed bulking programs. ◢ Project designs shall be reconfigured, whenever practicable, to avoid special-status species and sensitive habitats. Projects shall minimize ground disturbances and transportation project footprints near sensitive areas to the extent practicable. ◢ Temporary access roads and staging areas shall not be located within the areas containing sensitive plants or wildlife species wherever feasible, to avoid or minimize impacts on these species. ◢ Project activities in the vicinity of sensitive resources shall be completed during the period that best avoids disturbance to plant and wildlife species present to the extent feasible. ◢ Individual projects shall minimize the use of in-water construction methods in areas that support sensitive aquatic species, especially when listed species could be present. ◢ If equipment needs to operate in any watercourse with flowing or standing water where special-status species may be affected, a qualified biological resource				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
monitor shall be present to alert construction crews to the possible presence of such special-status species. ◢ If project activities involve pile driving or vibratory hammering in or near water, interim hydroacoustic threshold criteria for protected fish species shall be adopted as set forth by the Interagency Fisheries Hydroacoustic Working Group, as well as other avoidance methods to reduce the adverse effects of construction to sensitive fish, piscivorous birds, and marine mammal species. ◢ A qualified biologist shall locate and fence off sensitive resources before construction activities begin and, where required, shall inspect areas to ensure that barrier fencing, stakes, and setback buffers are maintained during construction. ◢ For work sites located adjacent to special-status plant or wildlife populations, a biological resource education program shall be provided for construction crews and contractors (primarily crew and construction foremen) before construction activities begin. ◢ Biological monitoring shall be considered for areas near identified habitat for State- and federally listed species, and a "no take" approach shall be taken whenever feasible during construction near special-status plant and wildlife species. ◢ Mitigation Measure NOISE-1 shall be implemented when permanent or temporary noise has been identified as having a potential impact on wildlife. ◢ Impacts resulting from nighttime lighting associated with construction and future permanent lighting shall be assessed at the project level. This assessment shall include an analysis of current light sources in the vicinity of the project. All feasible measures to reduce impacts from nighttime lighting shall be considered and implemented at the project level based on site-specific conditions. They may include but shall not be limited to the following measures: ◤ To the extent feasible, nighttime lighting sources shall not be installed in areas that contain or are likely to contain habitat suitable for special-status species. ◤ Nighttime lighting shall be directed at the construction or project site and away from sensitive habitats. Light glare shields shall be used to reduce the extent of illumination onto adjoining areas. Permanent lighting shall be shielded and directed at intended use areas.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◤ LEDs or bulbs installed as part of a project shall be rated to emit or produce light at or under 2700 Kelvin, which results in the output of a warm white color spectrum. ◤ Physical barriers, including solid concrete barriers or privacy slats in cyclone fencing, shall be installed where they have the potential to reduce illumination from overhead lights and automobile lights. Barriers should only be utilized as a light pollution minimization measure if they do not create a substantial barrier to wildlife movement such that the height and/or width of the barrier do not allow wildfire to move through the area. Additional barrier types should be employed when feasible, such as privacy slats into the spacing of cyclone fencing to create light barriers for areas outside the roadway. ◤ Reflective highway markers shall be used to reduce raptor collisions on roadways. ◤ Projects on previously unlit roadways with adjacent sensitive habitat and open space shall explore design options that address safety needs without the use of artificial lighting. ◤ If nighttime lighting has the potential to result in adverse effects on a listed or candidate wildlife species (e.g., a nest, den, or other important habitat feature is identified near the project site), then consultation with the appropriate natural resource agency may be required. ◢ Fencing and/or walls shall be built to avoid temporary or permanent access of humans or domestic animals from development areas into areas occupied by special-status species. Spoils, trash, or any debris shall be removed offsite to an approved disposal facility. ◢ Project activities shall comply with existing local regulations and policies, including applicable HCP/NCCPs, that exceed or reasonably replace any of the above measures protective of special-status species. ◢ Compensatory mitigation for unavoidable loss of habitat or other impacts on special-status species may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through Regional Advance Mitigation Planning (RAMP) (i.e., Conservation and Mitigation Banking, natural community conservation planning, Regional Conservation Investment Strategies), as deemed appropriate by the permitting agencies. Projects will prioritize mitigation banking within the same county as the project, if possible (i.e., if mitigation banks or mitigation credits are available in a given county).				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure BIO-(1b): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, for projects that could affect designated critical habitat for federally listed plant and wildlife species that include those identified below (or other equally effective measures): ◢ Coordination with USFWS and NOAA Fisheries, as appropriate based on the species, shall be conducted early in the environmental review process to determine the need for further mitigation, consultation, or permitting actions. Formal consultation is required for any project with a federal nexus when a listed species or designated critical habitat is likely to be adversely affected. Any conservation measures required by USFWS or NOAA Fisheries as part of formal consultation (e.g., through issuance of a biological opinion) would be implemented. ◢ Reconfigure project design to avoid or minimize adverse effects on protected species within designated critical habitats. ◢ Implementing agencies and/or project sponsors shall comply with existing local regulations and policies, including applicable HCP/NCCPs. ◢ Additionally, implementation of Mitigation Measure BIO-1(a), above, includes an initial biological resource assessment and, if necessary, compensatory mitigation for unavoidable loss of habitat or other impacts on special-status species. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through RAMP, as deemed appropriate by the permitting agencies.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure BIO-1(b) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure BIO-2: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Implementing agencies shall require project sponsors to prepare biological resource assessments for specific projects proposed in areas containing, or likely to contain, jurisdictional waters or other sensitive or special-status communities. These assessments shall be conducted by qualified professionals in accordance with agency guidelines and standards. Qualified professionals shall reference applicable regional data sources for wetland mapping, which may include, but not be limited to, the Adaptation Atlas (San Francisco Estuary Institute 2021), Recovery Plan for Tidal Marsh Ecosystems of Northern and	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure BIO-2 into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Central California (USFWS 2013), and the 2015 Bay Ecosystem Habitat Goals Update (Goals Project 2015). Where the biological resource assessments establish that mitigation is required to avoid and minimize direct and indirect adverse effects on State- or federally protected wetlands, or compensate for unavoidable effects, mitigation shall be developed consistent with the requirements or standards of USACE, EPA, RWQCB, and CDFW, and local regulations and guidelines, in addition to requirements of any applicable and adopted HCP/NCCP or other applicable plans developed to protect these resources. In keeping with the "no net loss" policy for jurisdictional waters (i.e., wetlands and other waters of the United States or State), project designs shall be configured, whenever possible, to avoid wetlands and other waters and avoid disturbances to wetlands and riparian corridors to preserve both the habitat and the overall ecological functions of these areas. Projects shall minimize ground disturbances and transportation project footprints near such areas to the extent practicable. ◤ Project sponsors shall consult with USFWS, NMFS, USFS, CDFW where State-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the ESA, the MBTA during the breeding season, CESA, or fully protected species afforded protection pursuant to the State Fish and Game Code and with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. ◢ Where avoidance of jurisdictional waters is not feasible, project sponsors shall minimize fill and the use of in-water construction methods, and place fill only with express permit approval from the appropriate resource agencies (e.g., USACE, RWQCB, CDFW, BCDC, CCC) and in accordance with applicable existing regulations, such as the Clean Water Act or local stream protection ordinances. ◢ Where avoidance of jurisdictional waters is not feasible, project sponsors shall arrange for compensatory mitigation in the form of mitigation bank credits; on-site or off-site enhancement of existing waters; or wetland creation in accordance with applicable existing regulations and subject to approval by USACE, RWQCB, CDFW, BCDC, and/or CCC. If compensatory mitigation is required, the project sponsor shall develop a restoration and monitoring plan that describes how compensatory mitigation will be achieved, implemented, maintained, and monitored. At a minimum, the restoration and monitoring plan shall include clear goals and objectives, success criteria, specifics on		inclusion in construction contracts.		

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
restoration/creation/enhancement (e.g., plant palette, soils, irrigation design standards and requirements), specific monitoring periods and reporting guidelines, and a maintenance plan. The following minimum performance standards (or other standards as required by the permitting agencies) shall apply to any wetland compensatory mitigation: ◤ Compensation shall be provided at a minimum 1:1 ratio for restoration, preservation, and creation but shall in all cases be consistent with mitigation ratios set forth in locally applicable plans (e.g., general plans, HCP/NCCPs) or in project-specific permitting documentation. Compensatory mitigation may be a combination of on-site restoration/creation/enhancement or off-site restoration, preservation, or enhancement. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through RAMP, as deemed appropriate by the permitting agencies. ◤ In general, any compensatory mitigation shall be monitored for a minimum of 5 years and will be considered successful when at least 75% cover (or other percent cover considered appropriate for the vegetation type) of installed vegetation has become successfully established. ◤ If the restoration is not meeting success criteria, remedial measures shall be implemented and can include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods. After final success criteria have been met and relevant permitting agencies have approved the mitigation project as complete, all mitigation areas shall be permanently conserved (e.g., conservation easement) and managed in perpetuity. ◢ Salvage and stockpile topsoil (i.e., the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes shall be avoided as identified by the qualified wetland biologist. ◢ In accordance with CDFW guidelines and other instruments protective of sensitive or special- status natural communities, project sponsors shall avoid and minimize impacts on sensitive natural communities and habitats when designing and permitting projects. Where applicable, projects shall conform to the provisions of special area management or restoration plans, such as the				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Suisun Marsh Protection Plan and the East Contra Costa County HCP, which outline specific measures to protect sensitive vegetation communities. Where applicable, project sponsors shall consult standards established in the Regional Shoreline Adaptation Plan guidelines to avoid impacts on shoreline habitats. ◢ If any portion of a sensitive natural community is permanently removed or temporarily disturbed, the project sponsor shall provide compensatory mitigation for the loss. If such mitigation is required by the implementing agency, the project sponsor shall develop a restoration and monitoring plan that describes how compensatory mitigation will be achieved, implemented, maintained, and monitored. At a minimum, the restoration and monitoring plan shall include clear goals and objectives, success criteria, specifics on restoration/creation/enhancement (e.g., plant palette, soils, irrigation design standards and requirements), specific monitoring periods and reporting guidelines, and a maintenance plan. The following minimum performance standards (or other standards as required by the permitting agencies) shall apply to any compensatory mitigation for sensitive natural communities: ◤ Compensation shall be provided at a minimum 1:1 ratio for restoration and preservation but shall in all cases be consistent with mitigation ratios set forth in locally applicable plans (e.g., general plans, HCP/NCCPs) or in project-specific permitting documentation. Compensatory mitigation may be a combination of on-site restoration/creation/enhancement or off-site restoration, preservation, or enhancement. Compensatory mitigation may be achieved in advance of impacts through the purchase or creation of mitigation credits or the implementation of mitigation projects through RAMP, as deemed appropriate by the permitting agencies. ◤ In general, any compensatory mitigation shall be monitored for a minimum of 5 years and will be considered successful when at least 75% cover (or other percent cover considered appropriate for the vegetation type) of installed vegetation has become successfully established. ◤ If the restoration is not meeting success criteria, remedial measures shall be implemented and may include, but are not limited to, replanting, reseeding, grading adjustments, supplemental irrigation, access control, increased weed control, and extended maintenance and monitoring periods. After final success criteria have been met and relevant permitting agencies have approved the mitigation project as complete, all mitigation areas shall be permanently conserved (e.g., conservation easement) and managed in perpetuity.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ All construction materials, staging, storage, dispensing, fueling, and maintenance activities shall be located in upland areas outside of sensitive habitat, and adequate measures shall be taken to prevent any potential runoff from entering jurisdictional waters. Fueling of equipment shall take place within existing paved roads. Contractor equipment shall be checked for leaks prior to operation and repaired, as necessary. ◢ Construction activities shall be scheduled, to the extent feasible, to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. ◢ Compliance with existing local regulations and policies, including applicable HCP/NCCPs, that exceed or reasonably replace any of the above measures protective of wetlands and other waters or sensitive natural communities.				
Mitigation Measure BIO-3(a): Implementing agencies shall require project sponsors to prepare detailed analyses for specific projects affecting mapped critical linkages to determine the wildlife species that may use these areas and the habitats those species require. Projects that would not affect mapped critical linkages but that are located within or adjacent to open space lands, including wildlands and agricultural lands, or otherwise may contain land used as wildlife movement corridors (e.g., green belts in urban areas) shall also assess whether significant wildlife corridors are present, what wildlife species may use them, and what habitat those species require. The assessment shall be conducted by qualified professionals and according to applicable agency standards with consideration of the local, regional, and global context of landscape connectivity for a given project in a given area. Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Design projects to minimize impacts on wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. ◢ Design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. ◢ Consult relevant guidance documents regarding wildlife movement and habitat connectivity during the project design phase, including but not limited to statewide and Bay Area region guides (e.g., CLN mapping, CDFW's California Wildlife Barriers 2020 [CDFW 2020], the California Department of Transportation's Wildlife Crossings Guidance Manual [Meese et al. 2007],	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure BIO-3(a) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Critical Linkages: Bay Area & Beyond [Penrod et al. 2013]), and local guides (e.g., Gray et al. 2018; Diamond and Snyder 2016). ◢ Conduct wildlife movement studies for projects that may fragment or constrict regional or local corridors and impede use to nursery sites. These studies will include, but would not be limited to, the following objectives: identify activity levels and directional wildlife movement trends within the study area, consult the California Fish Passage Assessment Database (CALFISH database) to identify potential fish barrier locations and conduct first pass and second pass fish assessments as necessary, assess current functionality of existing underpasses, and determine what species or groups of species exhibit sensitivity to the existing roadways. Movement studies shall identify project-specific measures to avoid or mitigate impacts on corridors and movement to nursery sites that may include, but are not limited to, developing alternative project designs that allow wider movement corridors to remain; provide for buffer zones adjacent to corridors, such as passive recreation zones; implement physical barriers that prevent human and/or domestic predator entry into the corridor or block noise and lighting from development; incorporate shielded and directed lighting in areas near corridors; implement a "natives only" landscaping policy within 200 feet of identified wildlife corridors; incorporate periodic larger habitat patches along a corridor's length; minimize the number of road crossings of identified wildlife corridors; and replace roadway culverts with bridges to allow for wildlife movement. ◢ For projects that cannot avoid significant impacts on wildlife movement corridors or native wildlife nursery areas, consult with CDFW to determine appropriate measures to minimize direct and indirect impacts and implement measures to mitigate impacts on wildlife corridors or native wildlife nursery sites. ◢ Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Preservation or improvements of habitat on both sides of a wildlife crossing shall be prioritized. ◢ Analyze habitat linkages and wildlife movement corridors on a broad scale for long linear projects with the possibility of adversely affecting wildlife movement to avoid critical narrow choke points that could reduce function of recognized movement corridor. ◢ Construct wildlife-friendly overpasses and culverts. These structures shall be designed to meet the needs of appropriate species, considering factors such as the size or diameter of the structure (e.g., large enough to allow a target species				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
to pass through/over or to allow sufficient stream flow), interval frequency, and/or physical design to allow conditions similar to the surrounding habitat (e.g., open-bottom culverts that provide natural substrate on the stream bottom). ◢ Upgrade existing culverts or implement directional fencing to guide animals to existing culverts or underpasses when conducting expansion or enhancement projects on existing roads. ◢ Fence major transportation corridors in the vicinity of identified wildlife corridors. ◢ Use wildlife-friendly fences that allow larger wildlife, such as deer, to jump over (i.e., no greater than 4 to 5 feet tall on average) and smaller wildlife to move under (by leaving a gap under the fence). ◢ For projects that require the placement of stream culverts in a fish spawning stream, follow USACE, NOAA Fisheries, USFWS, and CDFW permit conditions and design requirements to allow fish passage through the culverts. ◢ Limit wildland conversions in identified wildlife corridors such that the function of the wildlife corridor is not impaired. ◢ Retain wildlife-friendly vegetation in and around developments (e.g., native plant species; vegetation that provides sufficient cover, nesting, or foraging opportunities; mature trees; riparian vegetation). ◢ Monitor and maintain fencing, under crossings, and/or other crossing structures as needed to ensure corridor permeability and functionality. Development and implementation of a fencing and wildlife crossing structure maintenance plan is recommended to maintain permeability for wildlife across corridors. ◢ Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 Section 460 of the CCR (protecting fur-bearing mammals), during the breeding season. ◢ Comply with existing local regulations and policies, including applicable HCP/NCCPs, that exceed or reasonably replace any of the above measures to protect wildlife corridors.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure BIO-3(b): Implementing agencies and/or project sponsors shall implement the following measures, where feasible and as applicable based on project- and site-specific considerations: ◢ Implement Mitigation Measures BIO-1(a) and BIO-2.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure BIO-3(b) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure BIO-5: Implementing agencies and/or project sponsors shall implement the following measures (or other equally effective measures), where feasible and as applicable based on project- and site-specific considerations: ◢ Implement Mitigation Measures BIO-1(a), BIO-1(b), BIO-2, and BIO-3(a).	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure BIO-5 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
3.6 Climate Change, Greenhouse Gases, and Energy				
Mitigation Measure GHG-1: The applicable lead agency can and should implement, where feasible and as applicable to address site-specific construction climate change impacts, the following measures (or equally effective measures) to avoid or minimize impacts related to construction GHG emissions: ◢ Project proponents shall require its contractors to restrict the idling of on- and off-road diesel equipment to no more than 5 minutes while the equipment is on-site.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure GHG-1 into project-	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Project proponents of new facilities shazll implement waste, disposal, and recycling strategies (i.e., 10% recycled content for Tier 1 and 15% recycled content for Tier 2) in accordance with the voluntary measures for nonresidential land uses contained in Section A5.405 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction. ◢ Project proponents of new facilities shall achieve or exceed the enhanced Tier 2 target for nonresidential land uses of recycling or reusing 80% of the construction waste as described in Section A5.408 of the 2022 CALGreen Code or in accordance with any update to these requirements in future iterations of the CALGreen Code in place at the time of project construction. ◢ Project proponents shall require all diesel-powered, off-road construction equipment meet EPA's Tier 3 or Tier 4 emissions standards as defined in 40 CFR 1039 and comply with the exhaust emission test procedures and provisions of 40 CFR Parts 1065 and 1068. This measure can also be achieved by using battery-electric off-road equipment as it becomes available. ◢ Project proponents shall implement a program that incentivizes construction workers to carpool and use public transit or EVs to commute to and from the project site.		specific design plans or environmental review including possible inclusion in construction contracts.	documents prepared for projects consistent with PBA 2050+.	
Mitigation Measure GHG-3: ABAG and MTC, in partnership with air districts in the plan area, shall work with the counties and cities in the plan area to adopt qualified GHG reduction plans (e.g., CAPs), develop GHG-reducing planning policies, and implement local climate initiatives, with the ultimate completion date to be achieved by the proposed plan's horizon year. These reductions can be achieved through a combination of programs, including zero net energy in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, and other measures. Notably, the development and implementation of GHG reduction plans would ultimately occur at the discretion of local agencies, counties, and municipalities. Nevertheless, ABAG and MTC shall contribute relevant data and protocols to assist in the development of inventories, forecasts, and GHG reduction strategies. ◢ Implement Mitigation Measures AQ-3(a) through AQ-3(d), TRA-2(a), and TRA-2(b).	Following plan approval.	MTC, ABAG, local air districts, and local agencies develop plans and policies, per Mitigation Measure GHG-3	MTC, ABAG, local air districts	MTC, ABAG, local air districts

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
3.7 Cultural Resources and Tribal Cultural Resources				
Mitigation Measure CUL/TCR-1: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ Require a survey and evaluation of buildings and structures greater than 50 years in age within the area of potential effect to determine their eligibility for recognition under federal, State, and/or local historic preservation criteria. The evaluation shall be prepared by an architectural historian or historical architect meeting the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation-Professional Qualification Standards (SOI PQS). The evaluation shall comply with CEQA Guidelines Section 15064.5(b) and, if federal funding or permits are required, with Section 106 of the National Historic Preservation Act of 1966 (16 US Code Section 470 et seq.). Study recommendations shall be implemented. ◢ Realign or redesign projects to avoid impacts on known historical resources where possible. ◢ If avoidance of impacts to a significant historical resource is not feasible, implement additional mitigation options that include specific design plans for historic districts or plans for alteration or adaptive reuse of a historical resource that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. The application of the standards shall be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report meeting industry standards shall identify and specify the treatment of character-defining features and construction activities and be provided to the lead agency for review and approval. ◢ If a project would result in the demolition or significant alteration of a historical resource, the resource shall be recorded prior to demolition or alteration. Recordation shall take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation and shall be performed by an architectural historian or historian who meets the SOI PQS. The documentation package shall be archived in appropriate public and secure repositories. The specific scope	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure CUL/TCR-1 into project specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
and details of documentation shall be developed at the project level in coordination with the lead agency. ◢ Comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect historical resources.				
Mitigation Measure CUL/TCR-2: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below: ◢ Before construction activities, project sponsors shall retain a qualified archaeologist to conduct a record search at the appropriate information center to determine whether the project area has been previously surveyed and whether resources were identified; the record search shall include contacting the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. If a survey of the project area has not been conducted in the last 5 years, project sponsors shall retain a qualified archaeologist to conduct archaeological surveys prior to construction activities. Project sponsors shall follow recommendations identified in the survey, which may include activities such as subsurface testing, designing and implementing a Worker Environmental Awareness Program, construction monitoring by a qualified archaeologist, avoidance of sites, or preservation in place. ◢ Areas determined to be of cultural significance shall be monitored during the grading, excavation, trenching, and removal of existing features by a qualified archeologist and culturally affiliated California Native American tribal monitor. ◢ To ensure that new transportation facilities do not adversely affect potentially buried archaeological deposits, an underwater archaeological survey shall be conducted to identify, evaluate, and protect significant submerged cultural resources prior to activities that would disturb the shoreline or the floor of the bay. Additionally, the archaeologist shall request a search of California State Lands Commission's Shipwreck Database. ◢ When a project would impact a known archaeological site, the project sponsor and/or implementing agency shall determine whether the site is a historical resource (CEQA Guidelines Section 15064.5[c][1]). If archaeological resources identified in the project area are considered potentially significant, the project sponsor and/or responsible implementing agency shall undertake additional studies overseen by a qualified archaeologist (36 CFR Section 61) to evaluate the resources eligibility for listing in the CRHR, NRHP, and/or local register and	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure CUL/TCR-2 into project specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
to recommend further mitigative treatment. Evaluations shall be based on, but not limited to, surface remains, subsurface testing, or archival and ethnographic resources, on the framework of the historic context and important research questions of the project area, and on the integrity of the resource. If a site to be tested is precontact, culturally affiliated California Native American tribal representatives shall be afforded the opportunity to monitor the ground-disturbing activities. Appropriate mitigation may include curation of artifacts removed during subsurface testing. ◢ If precontact archeological resources are identified through survey or discovered in the project area, the culturally affiliated California Native American tribe shall be notified. Both the archeologist and tribal monitor or tribal representative should strive for agreement on the determined significance of an artifact or cultural resource. ◢ If significant archaeological resources that meet the definition of historical or unique archaeological resources are identified in the project area, the preferred mitigation of impacts is preservation in place (CEQA Guidelines Section 15126.4[b]; PRC Section 21083.2). Preservation in place may be accomplished by, but is not limited to, avoidance by project design, incorporation within parks, open space or conservation easements, covering with a layer of sterile soil, or similar measures. If preservation in place is feasible, mitigation is complete. Additionally, where the implementing agency determines that an alternative mitigation method is superior to in-place preservation, the project sponsor and/or implementing agency may implement such alternative measures. ◢ When preservation in place or avoidance of historical or unique archaeological resources are infeasible, data recovery through excavation shall be required (CEQA Guidelines Section 15126.4[b]). Data recovery would consist of approval of a Data Recovery Plan and archaeological excavation of an adequate sample of site contents so that research questions applicable to the site can be addressed. For precontact sites, the culturally affiliated California Native American tribe shall be afforded the opportunity to monitor the ground-disturbing activities. If only part of a site would be impacted by a project, data recovery shall only be necessary for that portion of the site. Data recovery shall not be required if the implementing agency determines prior testing and studies have adequately recovered the scientifically consequential information from the resources. Confidential studies and reports resulting from the data recovery shall be deposited with the Northwest Information Center. Mitigation may include curation for artifacts removed during data recovery excavation.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ If archaeological resources are discovered during construction, all work near the find shall be halted and the project sponsor and/or implementing agency shall follow the steps described under CEQA Guidelines Section 15064.5(f), including an immediate evaluation of the find by a qualified archaeologist (36 CFR Section 61) and implementation of avoidance measures or appropriate mitigation if the find is determined to be a historical resource or unique archaeological resource. If the find is a precontact archaeological site, the culturally affiliated California Native American tribe shall be notified and afforded the opportunity to monitor mitigative treatment. During evaluation or mitigative treatment, ground disturbance and construction work could continue on other parts of the project area. ◢ Integrate curation of all historical resources or an archaeological nature or unique archaeological resources and associated records in a regional center focused on the care, management, and use of archaeological collections. All Native American human remains and associated grave goods discovered shall be returned to their Most Likely Descendent and repatriated. The final disposition of artifacts not directly associated with Native American graves will be negotiated during consultation with the culturally affiliated California Native American tribes. Artifacts include material recovered from all phases of work, including the initial survey, testing, indexing, data recovery, and monitoring. Curated materials shall be maintained with respect for cultures and available to future generations for research. ◢ Project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect archaeological resources.				
Mitigation Measure CUL/TCR-4(a): If the implementing agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process required under PRC Section 21080.3.2, implementing agencies and/or project sponsors shall implement the following measures (or equally effective measures), where feasible and as applicable, to address site-specific impacts and avoid or minimize the significant adverse impacts: ◢ Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource (PRC Section 21084.3[a]). If the lead agency determines that a project may cause a substantial adverse change to a tribal cultural resource, and measures are not otherwise identified in the consultation process,	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure CUL/TCR-4(a) into project specific design plans or environmental review including	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
provisions in the PRC describe mitigation measures that, if determined by the lead agency to be feasible, may avoid or minimize the significant adverse impacts (PRC Section 21084.3[b]). Examples include: ◤ avoiding and preserving the resources in place, including planning and constructing to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space to incorporate the resources with culturally appropriate protection and management criteria; ◤ treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including: – protecting the cultural character and integrity of the resource, – protecting the traditional use of the resource, and – protecting the confidentiality of the resource; ◤ establishing permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or using the resources or places; and ◤ protecting the resource. ◢ The implementing agency shall determine whether or not implementation of a project would indirectly affect tribal cultural resources by increasing public visibility and ease of access. If it would, the implementing agency shall take measures to reduce the visibility or accessibility of the tribal cultural resource to the public. Visibility of the resource can be reduced through the use of decorative walls or vegetation screening. Accessibility can be reduced by installing fencing or vegetation barriers, particularly noxious vegetation, such as poison oak or blackberry bushes. It is important to avoid creating an attractive nuisance when protecting tribal cultural resources. Conspicuous walls or signs indicating that an area is restricted may result in more attempts to access the excluded area.		possible inclusion in construction contracts.		

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure CUL/TCR-4(b): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable a based on project- and site-specific considerations, that include those identified below: ◢ Implement Mitigation Measure CUL/TCR-2.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure CUL/TCR-4(b) into project specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
3.8 Geology, Seismicity, and Mineral Resources				
Mitigation Measure GEO-7: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the PRC, adopted county and city general plans, and other federal, state, and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices for the assessment and mitigation of adverse impacts on paleontological resources. ◢ Obtain review by a qualified paleontologist to determine whether the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological resources or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey if units with paleontological potential are present at the surface. ◢ Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. ◢ Implement the following measures where avoidance of parent material with the potential to yield unique paleontological resources is not feasible:	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure GEO-7 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◤ All on-site construction personnel shall receive Worker Education and Awareness Program training before the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. ◤ A qualified paleontologist shall prepare a paleontological resource management plan (PRMP) to guide the salvage, documentation, and repository of unique paleontological resources encountered during construction. If unique paleontological resources are encountered during construction, qualified paleontologist shall oversee the implementation of the PRMP. ◤ Ground-disturbing activities in parent material with a moderate to high potential to yield unique paleontological resources shall be monitored using a qualified paleontological monitor to determine whether unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. ◢ Identify where ground disturbance is proposed in a geologic unit having the potential to contain fossils, and specify the need for a paleontological monitor to be present during ground disturbance in these areas. ◢ Avoid routes and project designs that would permanently alter unique geological features. ◢ Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. ◢ If paleontological resources are discovered during earthmoving activities, the construction crew will be directed to immediately cease work and notify the implementing agencies and/or project sponsors. The project sponsor will retain a qualified paleontologist for identification and salvage of fossils so that construction delays can be minimized. The paleontologist will be responsible for implementing a recovery plan which could include the following: ◤ in the event of discovery, salvage of unearthed fossil remains, typically involving simple excavation of the exposed specimen but possibly also plaster-jacketing of large and/or fragile specimens, or more elaborate quarry excavations of richly fossiliferous deposits; ◤ recovery of stratigraphic and geologic data to provide a context for the recovered fossil remains, typically including description of lithologies of fossil-bearing strata, measurement and description of the overall				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
stratigraphic section, and photographic documentation of the geologic setting; ◤ laboratory preparation (cleaning and repair) of collected fossil remains to a point of curation, generally involving removal of enclosing rock material, stabilization of fragile specimens (using glues and other hardeners), and repair of broken specimens; ◤ cataloging and identification of prepared fossil remains, typically involving scientific identification of specimens, inventory of specimens, assignment of catalog numbers, and entry of data into an inventory database; ◤ transferal, for storage, of cataloged fossil remains to an appropriate repository, with consent of property owner; ◤ preparation of a final report summarizing the field and laboratory methods used, the stratigraphic units inspected, the types of fossils recovered, and the significance of the curated collection; and ◤ project sponsors shall comply with existing local regulations and policies that exceed or reasonably replace any of the above measures that protect paleontological or geologic resources. ◢ Prepare significant recovered fossils to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. ◤ Following the conclusion of the paleontological monitoring, ensure that the qualified paleontologist prepares a report stating that the paleontological monitoring requirement has been fulfilled and summarizes the results of any paleontological finds. The report should be submitted to the CEQA lead agency and to the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including the treatment of paleontological materials; results of specimen processing, analysis, and research; and final curation arrangements.				

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
3.9 Hazards and Wildfire				
Mitigation Measure HAZ-4: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ The project proponent shall perform a records review to determine whether there is existing permitted use of hazardous materials or documented evidence of hazardous waste contamination on the project site and provide the results of this investigation to the implementing agency. ◢ For any project located on or near a hazardous materials and/or waste site pursuant to Government Code Section 65962.5 or sites that have the potential for residual hazardous materials as a result of historic land uses, project proponents shall prepare a Phase I ESA in accordance with the American Society for Testing and Materials' E1527-05 standard. ◢ For any project located on or near sites that are not listed and do not have the potential for residual hazardous materials as a result of historic land uses, no action is required unless unknown hazards are discovered during development. In that case, the implementing agency shall discontinue development until DTSC, RWQCB, the local air district, and/or other responsible agency issues a determination, which would likely require a Phase I ESA as part of the assessment. ◢ Develop, train, and implement worker awareness and protective measures to minimize worker and public exposure to an acceptable level and to prevent environmental contamination as a result of construction. ◢ Projects preparing a Phase I ESA, where required, shall fully implement the recommendations contained in the report. If a Phase I ESA indicates the presence or likely presence of contamination, the project proponent shall prepare a Phase II ESA, and recommendations of the Phase II ESA shall be fully implemented. ◢ Consult with the appropriate local, State, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure HAZ-4 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure HAZ-6: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ Continue to participate in the San Francisco Bay Area Regional Transportation Emergency Management (RTEMP), review the plan annually, and update as appropriate. ◢ Develop new methods of conveying projected and real time evacuation information to citizens using emerging electronic communication tools including social media and cellular networks. ◢ Adopt and/or revise, as appropriate, local emergency response and evacuation plans that address growth and potential for congestion on evacuation routes. Include contingencies for lower private automobile ownership and reliance on public transit for evacuation, consistent with the RTEMP. ◢ Require specific projects to demonstrate consistency with all applicable emergency response and evacuation plans. Where temporary road closures would be required during construction, prepare traffic mitigation plans that address traffic control and establish alternate emergency response and evacuation routes in coordination with emergency service providers.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure HAZ-6 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure HAZ-7: Implementing agencies and/or project sponsors shall implement measures, as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ Ensure that development of areas mapped by CAL FIRE as high and very high fire hazard severity zones complies with Title 14 of the California Code of Regulations minimum wildfire protection standards. ◢ Implementing agencies shall improve and educate residents and businesses regarding local emergency communications and notifications. ◢ Implementing agencies shall enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. ◢ Implementing agencies shall provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. ◢ Implementing agencies shall plan for and promote rapid revegetation of burned areas to help prevent erosion and protect bare soils.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure HAZ-7 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Implementing agencies shall develop a regulatory mechanism for permitting an aggressive hazardous fuels management program. ◢ Implementing agencies shall establish standards for fuel breaks that can slow or stop a wildfire advancing into a community or into the wildlands. Fuel breaks shall be strategically located to protect a community, structures, or routes of access and egress. Strategic locations may include ridgelines, greenbelts, or other locations to manage embers or support community-level fire suppression tactics. ◢ MTC shall facilitate minimizing future impacts to fire protection services through information sharing regarding fire-wise land management (vegetation data, fire-resistant building materials, locations where development is vulnerable to wildfire, and best practices for safe land management) with county and city planning departments. ◢ MTC, in partnership with technical experts and stakeholders, shall launch or continue existing initiatives to help local cities and counties to protect Bay Area communities and economies from the disruption of wildfire occurrences. Initiatives could include but not be limited to seminars that review the risk of wildfire and approaches for preparation, including strengthening of infrastructure, emergency services, emergency evacuation plans and reviewing building safety codes.				
3.11 Land Use, Population, and Housing				
Mitigation Measure LU-1: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ Orient transportation projects to minimize impacts on existing communities by: ◤ selecting alignments within or adjacent to existing public rights-of-way; ◤ designing sections above or below grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project; and ◤ wherever feasible incorporating direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles).	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure LU-1into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Where it has been determined that it is infeasible to avoid creating a barrier in an established community, encourage implementing agencies to consider other measures to reduce impacts, including but not limited to: ◤ shifting alignments to minimize the area affected; ◤ reducing the proposed right-of-way take to minimize the overall area of impact; and ◤ providing for bicycle, pedestrian, and vehicle access across improved roadways.				
Mitigation Measure LU-4: Implementing agencies and/or project sponsors shall implement, where feasible and as applicable based on project- and site-specific considerations, the mitigation measures described throughout this EIR to address the effects of displacement that could result in the construction of replacement housing, including: ◢ Mitigation Measures AES-1 through AES-4 ◢ Mitigation Measures AGF-1 through AGF-3 ◢ Mitigation Measures AQ-2 through AQ-4 ◢ Mitigation Measures BIO-1 through BIO-3 and BIO-5 ◢ Mitigation Measures GHG-1 and GHG-3 ◢ Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4 ◢ Mitigation Measure GEO-7 ◢ Mitigation Measures HAZ-4, HAZ-6 and HAZ-7 ◢ Mitigation Measure LU-1 ◢ Mitigation Measures NOISE-1 through NOISE-4 ◢ Mitigation Measures PSR-1 and PSR-2 ◢ Mitigation Measures PUF-1 through PUF-4 ◢ Mitigation Measure TRA-2	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure LU-4into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
3.12 Noise				
Mitigation Measure NOISE-1: To reduce construction noise levels to achieve the applicable noise standards of the relevant jurisdiction in the plan area, implementing agencies and project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ Comply with local construction-related noise standards, including restricting construction activities to permitted hours as defined under local jurisdiction regulations.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-1 into project-	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Notify residents and occupants within 294 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. ◢ Designate an on-site construction complaint and enforcement manager for the project. ◢ Post procedures and phone numbers at the construction site for notifying the implementing agency staff and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. ◢ Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silencers, wraps). Equipment engine shrouds shall be closed during equipment operation. ◢ Prohibit the idling of construction equipment for extended periods of time in the vicinity of sensitive receptors. ◢ Locate all stationary equipment (e.g., generators, compressors, rock crushers, and cement mixers) and staging areas as far as possible from nearby noise-sensitive receptors, or locate such equipment to the extent feasible such that an existing or constructed noise attenuating feature (e.g., temporary noise wall or blanket) blocks the line of sight between affected noise-sensitive receptors and construction staging areas. ◢ Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used. External jackets on the tools themselves should be used, if such jackets are commercially available. ◢ Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. ◢ For construction activity that would occur within a clear line of sight of an adjacent off-site sensitive receptor (as defined by the local jurisdiction), take place outside of hours during which construction activity is exempt from local noise standards, and exceed applicable construction noise standards or thresholds, the construction contractor shall install temporary sound barriers to attenuate noise, such as temporary noise curtains, sound walls, or similar		specific design plans or environmental review including possible inclusion in construction contracts.	documents prepared for projects consistent with PBA 2050+.	

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
products that provide a barrier to construction noise. The temporary sound barrier shall be located between the project construction noise sources and receptors to shield the receptors from construction noise. When installed properly, acoustic barriers can reduce construction noise levels by approximately 8–10 dB (EPA 1971). The installation of any temporary sound barrier shall meet all the following criteria: ◤ be installed as close as feasible to the boundary of the construction site within the direct line of sight path of the nearby sensitive receptor(s); ◤ consist of durable, flexible composite material featuring a noise barrier layer bound to sound-absorptive material on one side; and ◤ consist of rugged, impervious material with a surface weight of at least 1 pound per square foot, such that a minimum of 10 dBA reduction is achieved on the receiving side of the sound barrier.				
Mitigation Measure NOISE-2(a): To reduce exposure from traffic noise when significant and to achieve the applicable noise thresholds for each roadway type (i.e., 70 dBA CNEL for major roads/freeways, 65 dBA CNEL for all other roads, or as otherwise defined in applicable local noise standards), implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations to achieve noise levels in accordance with applicable local noise standards. Measures shall include those identified below (or other equally effective measures): ◢ Design adjustments to proposed roadway or transit alignments to reduce noise levels in noise-sensitive areas (e.g., below-grade roadway alignments can effectively reduce noise levels in nearby areas by providing a barrier between the source and receptor). ◢ Use techniques such as landscaped berms, reduced-noise paving materials, and traffic-calming measures in the design of transportation projects. ◢ Use rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. ◢ Maximize the distance between existing noise-sensitive land uses and new noise-generating facilities and transportation systems. ◢ Contribute to the insulation of buildings or construction of noise barriers around sensitive receptor properties adjacent to the transportation project.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-2(a) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Use land use planning measures, such as zoning, restrictions on development, site design, and buffers, to ensure that future development is noise compatible with adjacent transportation facilities and land uses. ◢ Monitor the effectiveness of noise-reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.				
Mitigation Measure NOISE-2(b): To reduce the exposure of existing sensitive receptors to non-transportation noise associated with the forecasted development pattern, implementing agencies and/or project sponsors shall, for projects with features that generate stationary noise that are near sensitive receptors, implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ Local agencies approving land use projects shall require that routine testing and preventive maintenance of emergency electrical generators be conducted during the less sensitive daytime hours (per the applicable local municipal code). Electrical generators or other mechanical equipment shall be equipped with noise control (e.g., muffler) devices in accordance with manufacturers' specifications. ◢ Maximize the distance between noise-sensitive land uses and new noise-generating facilities. ◢ Improve the acoustical insulation, window quality, and/or other soundproofing of dwelling units (existing or proposed) where setbacks do not sufficiently reduce noise. ◢ Local agencies approving land use projects shall require that external mechanical equipment, including HVAC units, associated with buildings and other stationary sources (e.g., commercial loading docks) incorporate features designed to reduce noise to below 70 dBA CNEL or the local applicable noise standard. These features may include locating equipment or activity areas in equipment rooms or enclosures that incorporate noise-reduction features, such as acoustical louvers and exhaust and intake silencers. Enclosures shall be oriented so that major openings (i.e., intake louvers, exhaust) are directed away from nearby noise-sensitive receptors. Site design considerations shall also incorporate appropriate setback distances, to the extent practical, from the noise and existing sensitive receptors to minimize noise exposure.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-2(b) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure NOISE-2(c): To reduce transit-related noise exposure to existing receptors within 50 feet of a rail transit line to below 70 dBA CNEL, or other applicable standard, implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ When finalizing development project site plans or transportation project design, sufficient setback between occupied structures and the railroad tracks shall be provided to minimize noise exposure to the extent feasible. ◢ When finalizing development project site plans, noise-sensitive outdoor use areas shall be sited as far away from adjacent noise sources as possible, and site plans shall be designed to shield noise-sensitive spaces with buildings or noise barriers whenever possible. ◢ Prior to project approval, the implementing agency for a transportation project shall ensure that the transportation project sponsor applies the following mitigation measures (or other technologically feasible measures) to achieve a site-specific exterior noise level of 70 dBA CNEL (or other applicable local noise standard) and interior noise level of 45 dBA CNEL at sensitive land uses, as applicable for transit projects: ◤ use sound reduction barriers, such as landscaped berms and dense plantings; ◤ locate rail extension below grade as feasible; ◤ use damped wheels on railway cars; ◤ use vehicle skirts; ◤ use undercar acoustically absorptive material; and ◤ install sound insulation treatments for affected structures.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-2(c) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure NOISE-3(a): To reduce construction vibration levels to acceptable levels (i.e., 65 VdB to 80 VdB depending on the frequency of the event and 0.1 to 0.6 PPV in/sec depending on building type), implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or other equally effective measures): ◢ To minimize disturbance of receptors within 545 feet of pile-driving activities, implement "quiet" pile-driving technology (such as predrilling of piles and the use of more than one pile driver to shorten the total pile-driving duration), where	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-3(a) into project-specific design plans or	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
feasible and as applicable, in consideration of geotechnical and structural requirements and conditions. ◢ To reduce structural damage, where pile driving is proposed within 55 feet of an existing structure, engage a qualified geotechnical engineer and qualified historic preservation professional (for designated historic buildings only) and/or structural engineer to conduct a preconstruction assessment of existing subsurface conditions and the structural integrity of nearby (i.e., within 55 feet) structures that would be exposed to pile-driving activity. If recommended by the preconstruction assessment, for structures or facilities within 55 feet of pile-driving activities, the project sponsors shall require ground vibration monitoring of nearby structures. Such methods and technologies shall be based on the specific conditions at the construction site. Conditions will be determined through activities such as the preconstruction surveying of potentially affected structures and underpinning of foundations of potentially affected structures, as necessary. The preconstruction assessment shall include a monitoring program to detect ground settlement or lateral movement of structures in the vicinity of pile-driving activities and identify corrective measures to be taken should monitored vibration levels indicate the potential for building damage. In the event of unacceptable ground movement with the potential to cause structural damage, all impact work shall cease, and corrective measures shall be implemented to minimize the risk to the subject, or adjacent, structure. ◢ Use cushion blocks to dampen impact noise from pile driving. ◢ Restrict high-impact construction activities (i.e., vibratory activities that generate 0.20 in/sec PPV or more at 25 feet) within 545 feet of sensitive receptors to permitted hours in accordance with local jurisdiction regulations.		environmental review including possible inclusion in construction contracts.	projects consistent with PBA 2050+.	
Mitigation Measure NOISE-3(b): To reduce vibration effects from rail operations, implementing agencies and/or project sponsors shall undertake a detailed evaluation of vibration and groundborne noise impacts and identify project-specific mitigation measures as necessary to reduce vibration to a level that complies with applicable local standards or FTA standards. To minimize the effects of vibration and groundborne noise from rail operations, the following measures (or other equally effective measures) shall be implemented where feasible and as applicable based on project- and site-specific considerations: ◢ Ensure that project sponsors apply the following measures to achieve FTA-recommended vibration levels of 72 VdB at residential land uses, or other applicable standard, for rail extension projects:	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-3(b) into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◤ Use high-resilience (soft) direct fixation fasteners for embedded track. ◤ Install ballast mat, or other approved technology for the purpose of reducing vibration, for ballast and tie track. ◤ Conduct regular rail maintenance, including rail grinding and wheel truing to recontour wheels, to provide smooth running surfaces. ◤ Maximize the distance between tracks and sensitive uses. ◤ Implement operational changes, such as limiting train speed and reducing nighttime operations.		inclusion in construction contracts.		
Mitigation Measure NOISE-4: Local lead agencies for all new development proposed to be located within an existing airport influence zone, as defined by the locally adopted ALUCP or local general plan, shall require a site-specific noise compatibility study. The study shall consider and evaluate existing aircraft noise, based on specific aircraft activity data for the airport in question, and shall include recommendations for site design and building construction to ensure compliance with interior noise levels of 45 dBA CNEL, such that the potential for sleep disturbance is minimized.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure NOISE-4 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
3.13 Public Services and Recreation				
Mitigation Measure PSR-1: Implementing agencies and/or project sponsors shall implement the following measure, where feasible and as applicable based on project- and site-specific considerations: ◢ For projects that could increase demand for public services facilities, implementing agencies and/or project sponsors shall coordinate with relevant service providers to ensure that the existing public services could accommodate the increase in demand. If existing facilities are found to be inadequate to maintain adequate capital capacity, equipment, personnel, and/or response times, facility improvements for the appropriate public service shall be identified in each project's CEQA documentation. Implementing agencies and/or project sponsors shall implement, where feasible and necessary, the mitigation measures described throughout this EIR to address	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PSR-1 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
the environmental effects related to the construction of new or expanded public service facilities: ◤ Mitigation Measures AES-1 through AES-4 ◤ Mitigation Measures AGF-1 through AGF-3 ◤ Mitigation Measures AQ-2 through AQ-4 ◤ Mitigation Measures BIO-1 through BIO-3 and BIO-5 ◤ Mitigation Measures GHG-1 and GHG-3 ◤ Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4 ◤ Mitigation Measure GEO-7 ◤ Mitigation Measures HAZ-4, HAZ-6 and HAZ-7 ◤ Mitigation Measures LU-1and LU-4 ◤ Mitigation Measures NOISE-1 through Noise-4 ◤ Mitigation Measures PSR-2 ◤ Mitigation Measures PUF-1 through PUF-4 ◤ Mitigation Measure TRA-2				
Mitigation Measure PSR-2: Implementing agencies and/or project sponsors shall implement, where feasible and as applicable, the mitigation measures described throughout this EIR to address the environmental effects related to the construction of new or expanded recreational facilities: ◢ Mitigation Measures AES-1 through AES-4 ◢ Mitigation Measures AGF-1 through AGF-3 ◢ Mitigation Measures AQ-2 through AQ-4 ◢ Mitigation Measures BIO-1 through BIO-3 and BIO-5 ◢ Mitigation Measures GHG-1 and GHG-3 ◢ Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4 ◢ Mitigation Measure GEO-7 ◢ Mitigation Measures HAZ-4, HAZ-6 and HAZ-7 ◢ Mitigation Measures LU-1 and LU-4 ◢ Mitigation Measures NOISE-1 through Noise-4 ◢ Mitigation Measures PSR-1 ◢ Mitigation Measures PUF-1 through PUF-4 ◢ Mitigation Measure TRA-2	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PSR-2 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
3.14 Public Utilities and Facilities				
Mitigation Measure PUF-1(a): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ For projects that could increase demand on water and wastewater treatment facilities, coordinate with the relevant service provider to ensure that the existing public services and utilities could accommodate the increase in demand. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-1(a) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure PUF-1(b): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures): ◢ During the design and CEQA review of individual future projects, determine whether sufficient stormwater drainage facilities exist for a proposed project. These CEQA determinations must ensure that the proposed development can be served by its existing or planned drainage capacity. If adequate stormwater drainage facilities do not exist, project sponsors shall coordinate with the appropriate utility and service provider to ensure that adequate facilities could accommodate the increased demand, and if not, infrastructure and facility improvements shall be identified in each project's CEQA determination. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities. ◢ For projects of greater than 1 acre in size, reduce stormwater runoff caused by construction by implementing stormwater control best practices, based on those required for a SWPPP.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-1(b) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure PUF-1(c): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below (or equally effective measures):	This mitigation measure will be considered by the implementing/ lead	If found to be feasible by the implementing/ lead agency, this measure would result in	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents,	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ For transportation projects, incorporate stormwater control, retention, and infiltration features, such as detention basins, bioswales, vegetated median strips, and permeable paving, early into the design process to ensure that adequate acreage and elevation contours are planned.	agency for applicability at the project level.	incorporation of the measures listed in Mitigation Measure PUF-1(c) into project-specific design plans or environmental review including possible inclusion in construction contracts.	including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	
Mitigation Measure PUF-1(d): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below, (or equally effective measures): ◢ For transportation projects implemented by Caltrans or subject to Caltrans review, adhere to Caltrans' Stormwater Management Plan, which includes best practices to reduce the volume of stormwater runoff and pollutants in the design, construction, and maintenance of highway facilities.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-1(d) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure PUF-1(e): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those identified below or equally effective measures): ◢ Consider the use of on site electric generation and storage systems that produce all or a portion of the energy used by a land use, sea level rise adaptation, or transportation project.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-1(e) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
Mitigation Measure PUF-1(f): Implementing agencies and/or project sponsors shall implement, where feasible and as applicable based on project- and site-specific considerations, the mitigation measures described throughout this EIR to address the effects related to the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, including: ◢ Mitigation Measures AES-1 through AES-4 ◢ Mitigation Measures AGF-1 through AGF-3 ◢ Mitigation Measures AQ-2 through AQ-4 ◢ Mitigation Measures BIO-1 through BIO-3 and BIO-5 ◢ Mitigation Measures GHG-1 and GHG-3 ◢ Mitigation Measures CUL/TCR-1, CUL/TCR-2, and CUL/TCR-4 ◢ Mitigation Measure GEO-7 ◢ Mitigation Measures HAZ-4, HAZ-6 and HAZ-7 ◢ Mitigation Measures LU-1 ◢ Mitigation Measures NOISE-1 through NOISE-4 ◢ Mitigation Measures PSR-1 and PSR-2 ◢ Mitigation Measures PUF-2 through PUF-4 ◢ Mitigation Measure TRA-2	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-1(f) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure PUF-2(a): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ For projects that could increase demand for water, coordinate with the relevant water service provider to ensure that the provider has adequate supplies to accommodate the increase in demand. This can and should be documented in the form of an SB 610 Water Supply Assessment, where applicable; an SB 221 Water Supply Verification; or other capacity analysis. ◢ Implement water conservation measures which result in reduced demand for potable water. This could include reducing the use of potable water for landscape irrigation (such as through drought-tolerant plantings, water-efficient irrigation systems, the capture and use of rainwater) and the use of water-conserving fixtures (such as dual-flush toilets, waterless urinals, reduced flow faucets).	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-2(a) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◢ Coordinate with the water provider to identify an appropriate water consumption budget for the size and type of project and designing and operating the project accordingly. ◢ For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite. ◢ Where applicable, apply Tier 1 or Tier 2 CALGreen standards as mandatory local requirements, which reduce water use by 12% and 20%, respectively, and require additional qualifying elective actions.				
Mitigation Measure PUF-2(b): Implementing agencies and/or project sponsors shall require the construction phase of transportation projects to connect to reclaimed water distribution systems for non-potable water needs, when feasible based on project- and site-specific considerations.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-2(b) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant
Mitigation Measure PUF-2(c): Implementing agencies and/or project sponsors shall require transportation projects with landscaping to use drought-resistant plantings or connect to reclaimed water distribution systems for irrigation and other non-potable water needs when available and feasible based on project- and site-specific considerations.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-2(c) into project-specific design plans or environmental review including possible	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
		inclusion in construction contracts.		
Mitigation Measure PUF-3: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ During the design and CEQA review of individual future projects, determine whether sufficient wastewater treatment capacity exists for a proposed project. These CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities. ◢ Require compliance with Mitigation Measure PUF-2(a), and MTC shall require implementation of Mitigation Measures PUF-2(b) and PUF-2(c), as feasible based on project- and site-specific considerations to reduce water usage and, subsequently, some wastewater flows.	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level. Same as specified for Mitigation Measure PUF-2(a), PUF-2(b), and PUF-2(c), above.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-3 into project-specific design plans or environmental review including possible inclusion in construction contracts. Same as specified for Mitigation Measure PUF-2(a), PUF-2(b), and PUF-2(c), above.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+. Same as specified for Mitigation Measure PUF-2(a), PUF-2(b), and PUF-2(c), above.	Implementing/ lead agency and/or project applicant MTC
Mitigation Measure PUF-4: Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, that include those (or equally effective measures) identified below: ◢ Provide an easily accessible area that is dedicated to the collection and storage of non-hazardous recycling materials. ◢ Maintain or reuse existing building structures and materials during building renovations and redevelopment. ◢ Use salvaged, refurbished, or reused materials to help divert such items from landfills. ◢ Divert construction waste from landfills, where feasible, through means such as: ◤ submitting and implementing a construction waste management plan that identifies materials to be diverted from disposal;	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure PUF-4 into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
◤ establishing diversion targets, possibly with different targets for different types and scales of development; and ◤ helping developments share information on available materials with one another, to aid in the transfer and use of salvaged materials. ◢ Apply the specifications developed by the Construction Materials Recycling Association (CMRA) to assist contractors and developers in diverting materials from construction and demolition projects, where feasible (CalRecycle 2006).				
3.15 Transportation				
Mitigation Measure TRA-2(a): MTC shall work with State and local agencies to ensure implementation of components of the plan that will help to reduce regional VMT, particularly projects that improve or expand transit service, as well as bicycle and pedestrian facilities. These transportation projects, in conjunction with land use policies included in the plan, will help the region to achieve the projected decreases in regional VMT per capita and achieve the region's SB 375 targets for GHG emissions. MTC will collaborate with State and other agencies to explore the feasibility of new programs for reducing VMT, such as VMT fees, banks, and exchanges.	Following plan approval.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure TRA-2(a) into project-specific design plans or environmental review including possible inclusion in construction contracts.	MTC and implementing/lead agency	MTC and implementing/lead agency
Mitigation Measure TRA-2(b): Implementing agencies and/or project sponsors shall implement measures, where feasible and as applicable based on project- and site-specific considerations, consistent with MTC's "Key SB 743 Implementation Steps for Land Use Projects" that consist of but are not limited to those identified below (or equally effective measures): TDM strategies shall be incorporated into individual land use and transportation projects and plans, as part of the planning process. These TDM measures are strategies not included in EN9, rather they are measures that could and should be implemented by the local agency based on land use authority that neither MTC nor ABAG has. Local agencies shall incorporate strategies identified in the Federal Highway Administration's (FHWA's) publication: *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be	This mitigation measure will be considered by the implementing/ lead agency for applicability at the project level.	If found to be feasible by the implementing/ lead agency, this measure would result in incorporation of the measures listed in Mitigation Measure TRA-2(b) into project-specific design plans or environmental review including possible inclusion in construction contracts.	Implementing/ lead agency. Compliance will be reflected in subsequent CEQA compliance documents, including Sustainable Communities Environmental Assessments (SCEAs) or other tiered CEQA documents prepared for projects consistent with PBA 2050+.	Implementing/ lead agency and/or project applicant

Mitigation Measures	Timing	Implementation of Measure	Oversight Responsibility	Implementation Responsibility
included, as applicable, to encourage use of transit and nonmotorized modes of transportation and reduce VMT on the region's roadways: ◢ include TDM mitigation requirements for new developments; ◢ incorporate supporting infrastructure for nonmotorized modes, such as bike lanes, secure bike parking, sidewalks, and crosswalks; ◢ provide incentives to use alternative modes and reduce driving, such as universal transit passes, road and parking pricing; ◢ implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; ◢ develop TDM-specific performance measures to evaluate project-specific and system-wide performance; ◢ incorporate TDM performance measures in the decision-making process for identifying transportation investments; ◢ implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and ◢ set aside funding for TDM initiatives.				
Mitigation Measure TRA-2(c): Implementing agencies and/or project sponsors shall implement the following measure, where applicable and necessary based on project- and site-specific considerations (or equally effective measures): ◢ Implement Mitigation Measure GHG-3.	Same as specified for Mitigation Measure GHG-3, above.	Same as specified for Mitigation Measure GHG-3, above.	Same as specified for Mitigation Measure GHG-3, above.	Same as specified for Mitigation Measure GHG-3, above.

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375 Beale Street, Suite 800
San Francisco, CA 94105

Metropolitan Transportation Commission

Legislation Text

File #: 26-0383, **Version:** 1

Subject:
MTC Resolution No. 4750. Final Plan Bay Area 2050+

Adoption of MTC Resolution No. 4750 approval the Final Plan Bay Area 2050+.

Presenter:
Dave Vautin

Recommended Action:
Commission Approval

Metropolitan Transportation Commission and Association of Bay Area Governments

Joint MTC Planning Committee with the ABAG Administrative Committee

March 13, 2026 **Agenda Item 8d**

MTC Resolution No. 4750; and ABAG Resolution No. 02-2026. Final Plan Bay Area 2050+

Subject:

Request referral of MTC Resolution No. 4750; and ABAG Resolution No. 02-2026. to the Commission and ABAG Executive Board, respectively.

Background:

In July 2023, MTC and ABAG initiated Plan Bay Area 2050+, a limited and focused update to the region's long-range plan for transportation, housing, economic development and environmental resilience. Plan Bay Area 2050+ is the region's fourth integrated long-range plan developed pursuant to Senate Bill 375 and builds on the foundation established by Plan Bay Area 2050.

Plan Bay Area 2050+ refines and advances the policy direction adopted in Plan Bay Area 2050, placing particular emphasis on navigating post-pandemic realities—such as increased remote work, lower transit ridership, and rising office vacancies—while also addressing a more constrained financial environment and balancing climate resilience and emissions reduction.

Rather than redefining the overall long-range planning framework, the update focuses on sharpening strategies, strengthening implementation actions, and improving near-term outcomes.

In parallel with development of Plan Bay Area 2050+, MTC and ABAG advanced Transit 2050+, a comprehensive, long-range planning effort conducted in coordination with the region's transit operators to reimagine public transit through 2050. Transit 2050+ included extensive technical analysis and stakeholder engagement. Findings and strategies from this effort informed development of Plan Bay Area 2050+, particularly with respect to transit investment priorities, service concepts, and long-term system performance.

Plan Development Process:

Plan Bay Area 2050+ was developed through an iterative process that integrated public engagement and technical analysis to evaluate, test, and refine strategies over time. From 2023 through 2025, this process informed each stage of plan development, including preparation of a Draft Blueprint, refinement into a Final Blueprint, and development of the Draft Plan Bay Area 2050+.

Public engagement was conducted throughout this iterative process and was both robust and inclusive. Since 2023, MTC and ABAG have engaged more than 17,600 residents through over 117 public and stakeholder events, collecting more than 15,600 comments and over 40,500 data points. More than 70 percent of engagement activities focused on Equity Priority Communities and other historically underserved populations, ensuring that communities most affected by regional challenges had a meaningful role in shaping the plan.

Plan Bay Area 2050+ continues to focus on transportation, housing, the economy, and the environment through 35 interconnected strategies. These strategies aim to expand affordable housing options while protecting vulnerable communities from climate risks such as wildfires and sea-level rise; enhance transportation systems to improve reliability, safety, and sustainability; promote economic mobility through initiatives such as job training programs and guaranteed income pilots; and protect natural resources while expanding access to parks and urban green spaces, particularly in underserved areas.

Together, the plan strategies seek to reduce housing and transportation cost burdens, improve access to jobs and services, and expand opportunity for all Bay Area residents, with a particular focus on Equity Priority Communities.

Plan Bay Area 2050+ also identifies more than 60 near-term implementation actions, developed in coordination with public, private, and nonprofit partners, to translate long-term strategies into measurable outcomes over the next five years. Key priorities include expanding affordable housing, improving transit connectivity, and advancing environmental sustainability.

If fully implemented, Plan Bay Area 2050+ would deliver meaningful progress across several key measures, including reducing combined housing and transportation costs for households, increasing the share of residents living within one-half mile of frequent transit, shifting more

commute trips to transit, biking, and walking, and expanding access to parks and green spaces in underserved communities.

These outcomes reflect the plan's commitment to making the region become more affordable, connected, diverse, healthy and vibrant for all. Plan Bay Area 2050+ represents an important step toward addressing the region's challenges while strengthening collaboration among local governments, regional agencies, and communities.

Revisions to Plan Document and Implementation Plan:

Between release of the Draft Plan on October 20, 2025, and the close of the public comment period on December 18, 2025, MTC and ABAG received more than 250 comments, including written comment letters and feedback provided through virtual workshops and other public engagement activities. Comments submitted in fall 2025 are available here: https://planbayarea.org/digital-library/draft-plan-bay-area-2050-plus-public-commentspdf. Comments on the Draft Plan, including the Draft Implementation Plan, were reviewed in December 2025 and January 2026. All comments were posted online and shared with Committee members in early February, and a related FAQ on the Final Regional Growth Forecast was subsequently posted on the project website: https://planbayarea.org/draftplan. In response to this feedback, as well as other minor updates, the following changes were incorporated into the proposed Final Plan documents with further context provided in **Attachment A**:

- **Plan Bay Area 2050+ Plan Document:** Refinements include an added Executive Letter, refreshed engagement metrics, minor map and data updates, new references to the Resilience Project List, and limited clarifications throughout. The overall policy direction, strategies, and structure remain unchanged.
    - **Implementation Plan:** Targeted updates include the addition of one new action, consolidation and refinement of several other actions to improve clarity, and minor edits to enhance consistency and readability. The overall scope and intent remain consistent with the draft.

- **Supplemental Reports:** Technical reports were finalized with modest clarifications, improved documentation, and formatting updates. Select reports were refined to improve transparency and responsiveness to public comments, and one new report—the Resilience Project List Report—was added to consolidate previously released information without introducing new policy or analysis.

The proposed Final Plan documents are available for review online on the Plan Bay Area 2050+ website; in-person and by appointment at 375 Beale Street in San Francisco; or by emailing info@planbayarea.org or calling (415) 778-6757 to make alternative arrangements to access the document.

Looking Ahead in 2026:

Following adoption of Plan Bay Area 2050+, staff will focus on implementing the plan's adopted actions, working with regional, state, and local partners to advance near-term priorities. Staff will report back to the joint committees annually with updates on overall progress on plan implementation, including progress on key performance metrics monitored through the Vital Signs web platform.

In parallel, in summer 2026, MTC and ABAG will initiate Plan Bay Area 2060, the next major update to the region's long-range plan. This effort will include both "blue sky" thinking and scenario planning to explore alternative policy and funding trajectories and to examine emerging issues shaping the region's future, including advances in artificial intelligence, automated vehicles, shifting demographics, and other transformative trends.

Next Steps:

If approved by the Commission and ABAG Executive Board later this month, staff will finalize the document and officially publish Plan Bay Area 2050+ as the new regional long-range plan and submit the plan to state and federal agencies.

Issues:

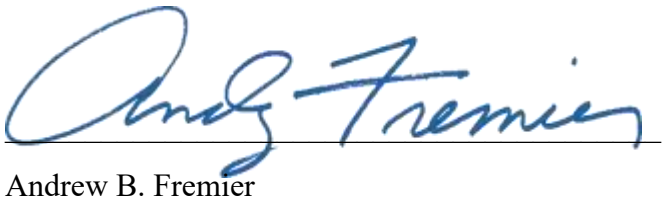
Because a new regional plan was not adopted within the required four-year federal timeframe, the Bay Area entered a transportation conformity lapse grace period on December 3, 2025. During this period, the Bay Area's ability to advance new or revise existing regionally significant transportation projects is limited. Adoption of the proposed Final Plan Bay Area 2050+ and subsequent federal approval are required to restore full project delivery authority.

Recommendation:

Refer ABAG Resolution No. 02-2026 to the ABAG Executive Board meeting on March 19, 2026, and MTC Resolution No. 4750 to the MTC Commission meeting on March 25, 2026, to adopt the proposed Final Plan Bay Area 2050+.

Attachments:

- Attachment A: Summary of Changes (Draft Plan to Final Plan)
- MTC Resolution No. 4750
    - Attachment A
- ABAG Resolution No. 02-2026
    - Attachment A



Andrew B. Fremier

Attachment A: Plan Bay Area 2050+ Summary of Changes

(Draft Plan to Final Plan)

This document summarizes changes to Draft Plan Bay Area 2050+ and all draft supplemental reports since they were released for public review in fall 2025. MTC-ABAG released Draft Plan Bay Area 2050+ in October 2025 for public review and comment. As the final round of engagement for Plan Bay Area 2050+, this comment period was the last scheduled opportunity for the public to provide feedback that could prompt refinements to the plan before it goes to the Metropolitan Transportation Commission and the ABAG Executive Board for adoption.

Plan Bay Area 2050+ Document

- Additional context added on autonomous vehicles and the Resilience Project List, as well as an introductory Executive Letter.
- Updated Implementation Plan actions *(see Implementation Plan Report below)*.
- Updated technical information based on newly available data from the California Air Resources Board, reflecting recent federal regulatory actions.
- Refreshed engagement numbers added following Round 4 engagement.
- Minor updates to maps and to address typos, citations and formatting.

Equity Analysis Report

- Added context noting that the report's Title VI equity analysis follows existing guidance, which FTA has indicated will be updated in the near term to align with the Department of Justice's revised regulations in accordance with Executive Order 14821.

Forecasting and Modeling Report

- Added more background information on the Regional Growth Forecast, including history, current statutory requirements, methodology, and relationships with the California Department of Finance population forecast and with the Regional Housing Needs Allocation (RHNA).
- Added additional modeling metrics and documentation from Travel Model 1.6.
- Minor updates to maps and citations.

Implementation Plan Report

- Added one new implementation action: "Action 61, Convene a technical advisory committee to review and update the Regional Growth Forecast Methodology."
- Merged two implementation actions associated with the Create Healthy and Safe Streets theme to reflect the full range of active transportation and Vision Zero initiatives in a single action; the new merged action is: "Action 21, Improve street safety and expand active transportation through a package of technical assistance offerings."
- Moderately refined seven actions (2, 3, 31, 34, 35, 48 and 64), resulting in small changes to scope and/or more substantial revisions to action descriptions based on input received during the public comment period.
- Made minor edits to 27 actions that did not alter the scope of the action, but improved clarity and consistency.
- **Native American Tribal Outreach Report**
- No significant edits.

Performance Report

- Updated technical information based on newly available data from the California Air Resources Board, reflecting recent federal regulatory actions.

Public Engagement Report

- Content added to reflect Round 4 engagement activities conducted since the release of Draft Plan Bay Area 2050+.

Resilience Project List Report *(New)*

- This report centralizes Resilience Project List information from the Draft Technical Assumptions Report, the Transportation and Resilience Project List Briefer, the Final Blueprint Resilience Project List and other draft Plan Bay Area 2050+ products. No new information was produced for this report after the release of Draft Plan Bay Area 2050+.
- The two edits to the Resilience Project List between the Draft and Final Plan did not change the environmental impact or cost of Strategy EN1 – Adapt to Sea Level Rise. The SR-37 project was separated into two components to clarify anticipated near-term activities, and the Pacifica Sea-Level Rise Adaptation Plan Adaptation Options project was broken into subcomponents to clarify near- and long-term projects.

Statutorily Required Plan Maps Report

- Updated description of Natural Lands maps to reflect the connection between the Bay Area conservation lands with the California State Wildlife Action Plan.
- Update to Map 4 (change in household density) to reflect accurate data.

Technical Assumptions Report

- Added clarifying language on consistency between state funding assumptions used in the plan and state funding estimates, as well as road pricing revenues.
- Updated language in the Environment Element chapter to reflect inclusion of the Resilience Project List Report.

Transit 2050+ Report

- Incorporated changes made to other reports, including the Transportation Project List and Implementation Plan Reports.

Transportation-Air Quality Conformity Report

- Updated summary of consultation and public engagement processes.
- Added summary of latest planning assumptions table; updated documentation of travel model updates.
- Added Appendix H: Response to Public Comments and adjusted numbering from other appendices.
- Minor updates to address typos, references and formatting.

Transportation Project List Report

- Added bike highways as a programmatic investment type within Strategy T9.
- Expanded the discussion on goods movement and the regional trail network.
- Clarification language added under Strategy EN1 on sea level rise adaptation and the role of external plans in shaping Plan Bay Area 2050+ strategies.
- Minor updates to address typos and revise formatting.

Date: March 25, 2026
W.I.: 1121
Referred by: Planning

ABSTRACT

MTC Resolution No. 4750

This resolution adopts Plan Bay Area 2050+, the long-range regional plan for the San Francisco Bay Area. Plan Bay Area 2050+ also serves as the Regional Transportation Plan and Sustainable Communities Strategy.

Further discussion of this subject is contained in the Planning Committee Summary Sheet dated March 13, 2026.

Date: March 25, 2026
W.I.: 1121
Referred by: Planning

Re: Adoption of Plan Bay Area 2050+

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4750

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to Government Code Section 66500 et seq.; and

WHEREAS, the Association of Bay Area Governments (ABAG), a joint exercise of powers entity created pursuant to California Government Code Sections 6500 et seq., is the Council of Governments and the regional land use planning agency for the San Francisco Bay Area; and

WHEREAS, California Government Code § 65080 et seq. requires MTC to prepare and update a long-range Regional Transportation Plan (RTP), including a Sustainable Communities Strategy (SCS) in conjunction with the ABAG, every four years; and

WHEREAS, MTC and ABAG jointly adopted the first Plan Bay Area in 2013 (Plan Bay Area 2013) (MTC Resolution No. 4111 and ABAG Resolution No. 06-13), and the second Plan Bay Area in 2017 (Plan Bay Area 2040) (MTC Resolution No. 4300 and ABAG Resolution No. 10-17), and the third Plan Bay Area in 2021 (Plan Bay Area 2050) (MTC Resolution No. 4485 and ABAG Resolution No. 09-21); and

WHEREAS, in summer 2023, MTC and ABAG initiated an update to Plan Bay Area 2050, known as Plan Bay Area 2050+ (the "Plan"), with a 2050 horizon year, which is intended to serve as the Regional Transportation Plan and Sustainable Communities Strategy for the San Francisco Bay Area, in conformance with applicable federal and state requirements, including Senate Bill 375; and

WHEREAS, the Plan, including both the RTP and the SCS, which is attached hereto as Attachment A, and incorporated herein as though set forth in length, contains an integrated set of fiscally-constrained strategies across each of the four elements of the Plan; and

WHEREAS, MTC and ABAG jointly adopted the Vision for Plan Bay Area 2050 in September 2019, emphasizing that resilient and equitable strategies should be prioritized to ensure by the year 2050 the Bay Area is affordable, connected, diverse, healthy, and vibrant for all (MTC Resolution No. 4393 and ABAG Resolution No. 09-19); and

WHEREAS, this Vision is carried forward into Plan Bay Area 2050+';

WHEREAS, ABAG approved the Regional Growth Forecast Methodology in September 2019, which guided the development of the Plan Bay Area 2050 Regional Growth Forecast and which is carried forward into Plan Bay Area 2050+; and

WHEREAS, the Plan Bay Area 2050+ Regional Growth Forecast was shared in draft form in November 2023 and was carried forward into the Final Blueprint phase as the Final Regional Growth Forecast for Plan Bay Area 2050+; and

WHEREAS, the California Air Resources Board (CARB) has set a -19 percent per capita greenhouse gas emissions (GHG) reduction target for the year 2035 for cars and light-duty trucks for the long-range regional plan; and

WHEREAS, the MTC Planning Committee and ABAG Administrative Committee approved the analysis of proposed Draft Blueprint Strategies as well as corresponding Draft Blueprint Growth Geographies for the Plan Bay Area 2050+ Draft Blueprint in January 2024; and

WHEREAS, MTC and ABAG approved revised Final Blueprint Strategies, including the Final Transportation Project List and Final Resilience Project List, and revised Final Blueprint

Growth Geographies in January 2025 (MTC Resolution No. 4687 and ABAG Resolution No. 04-2025); and

WHEREAS, MTC and ABAG advanced the Final Blueprint into the environmental review phase in June 2025 (MTC Resolution No. 4687 and ABAG Resolution No. 04-2025), and;

WHEREAS, MTC and ABAG analyzed Draft Plan Bay Area 2050+, previously known as the Final Blueprint, through the Environmental Impact Report (EIR) process under the California Environmental Quality Act (CEQA), releasing the Draft Plan Document and Draft Environmental Impact Report for review in October 2025, and;

WHEREAS, public and stakeholder engagement activities were held on Draft Plan Bay Area 2050+ from October 20, 2025, through December 18, 2025, with all comments considered and, when appropriate, integrated in Final Plan Bay Area 2050+ prior to its release in early March 2026, and;

WHEREAS, MTC and ABAG developed a detailed Implementation Plan with more than 60 discrete actions identified to advance the 35 strategies featured in the Final Plan Bay Area 2050+, to be implemented by MTC and ABAG in close coordination with partner organizations over the next five years, and;

WHEREAS, Final Plan Bay Area 2050+ was informed by extensive stakeholder engagement, including outreach to more than 17,600 residents across the Bay Area through over 117 public and stakeholder events and activities, resulting in more than 15,600 public comments and over 40,500 data points; and

WHEREAS, the Plan advances regional affordability through strategies to address the region's long-standing housing crisis by preserving existing affordable housing and supporting the production of new housing units across all income levels, while advancing means-based strategies to improve affordability for low-income transit riders and motorists; and

WHEREAS, the Plan advances regional connectivity through strategies to invest in a next-generation transit network and active transportation networks, improving the frequency, reliability, and reach of transit services and creating safer streets for walking, biking, and rolling, while improving access to destinations across the nine-county region and enabling shifts to healthier and more sustainable transportation modes; and

WHEREAS, the Plan helps to maintain and expand the region's diversity by advancing strategies to protect vulnerable lower-income renters from displacement, while working with Equity Priority Communities to invest in community-prioritized infrastructure and recognizing the need for targeted assistance programs for low-income renters and homebuyers; and

WHEREAS, the Plan advances human and environmental health through strategies to reduce greenhouse gas emissions by electrifying vehicles and buildings, reducing automobile dependence, and investing in parks, conservation, and climate resilience; and

WHEREAS, the Plan helps to maintain and grow the region's economic vibrancy through strategies to expand job training and business incubator programs to create economic opportunities in Equity Priority Communities, while preserving and investing in key industrial lands; and

WHEREAS, Final Plan Bay Area 2050+ meets all relevant federal and state requirements, including those related to air quality, land use, and transportation as described below; and

WHEREAS, MTC conducted a transportation-air quality conformity analysis of the Plan using the latest planning assumptions, emissions model, and consultation provisions, including a quantitative regional emissions analysis that meets emissions test requirements of the U. S. Environmental Protection Agency transportation conformity rule, and the Plan contributes to all required emissions reductions; and

WHEREAS, adoption of, and the conformity determination for, the Amended 2025 TIP has been determined simultaneously with the Plan for consistency purposes (MTC Resolution No. 4748); and

WHEREAS, pursuant to California Government Code § 65080(b)(2)(G), in preparing the Plan, MTC and ABAG considered spheres of influence adopted by the Local Agency Formation Commissions within the San Francisco Bay Area; and

WHEREAS, pursuant to California Government Code § 65080(b)(2)(E), federal public participation requirements, and MTC's Public Participation Plan (MTC Resolution No. 4590), the Plan was developed through a strategic, proactive, comprehensive public outreach and involvement program, which included: an adopted public participation plan; routine distribution of information to local/regional media; advertising in local and regional newspapers; distribution of public information materials, such as brochures and newsletters; a dedicated website; meetings with representatives from each county's board of supervisors and city councilmembers; noticed public hearings to receive testimony on the Plan and the EIR; subregional workshops to facilitate public comment on the Plan; and interagency coordination and involvement; and

WHEREAS, pursuant to California Government Code § 65080(b)(2)(B), the Plan (i) identifies the general location of uses, residential densities, and building intensities within the region; (ii) identifies areas within the region sufficient to house all the population of the region, including all economic segments of the population, over the course of the planning period of Plan Bay Area 2050 taking into account net migration into the region, population growth, household formation and employment growth; (iii) identifies areas within the region sufficient to house an eight-year projection of the regional housing need for the region pursuant to California Government Code § 65584; (iv) identifies a transportation network to service the transportation needs of the region; (v) gathers and considers the best practically available scientific information regarding resource areas and farmland in the region as defined in subdivisions (a) and (b) of California Government Code § 65080.01; (vi) considers the state housing goals specified in California Government Code §§ 65580 and 65581; and (viii) allows the Plan to comply with Section 176 of the Federal Clean Air Act (42 U.S.C. § 7506); and

WHEREAS, pursuant to California Government Code § 65080(b)(2)(B), in preparing the Plan, MTC was responsible for identifying a transportation network to service the transportation needs of the region; and allowing the Plan to comply with Section 176 of the Federal Clean Air Act (42 U.S.C. Sec. 7506); and

WHEREAS, pursuant to California Government Code § 65080(b)(2)(B), in preparing the Plan, MTC and ABAG were jointly responsible for setting forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and policies, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve the greenhouse gas emission reduction targets adopted by the California Air Resources Board (CARB) for the San Francisco Bay Area; and

WHEREAS, the California Air Resources Board (CARB) set a more ambitious year 2035 greenhouse gas emission reduction target for cars and light-duty trucks (19 percent reduction per-capita) for long-range regional plans in all major California metropolitan regions, as of March 2018; and

WHEREAS, as demonstrated in the Program EIR certified for the Plan, the Plan sets forth a forecasted development pattern for the region, which, when integrated with the transportation network, and other transportation measures and polices, will reduce the greenhouse gas emissions from automobiles and light trucks to achieve the regional greenhouse gas emission targets set by CARB for the region; and

WHEREAS, prior to taking action on the Plan, MTC has heard, been presented with, reviewed, and considered all of the information and data in the administrative record, including the Final Program EIR, and all oral and written evidence presented to it during all meetings and hearings; and

WHEREAS, adoption of the Plan is accompanied by adoption of the Amended 2025 TIP (MTC Resolution No. 4751) and preceded by certification that the Final Environmental Impact Report for the Plan complies with the CEQA (MTC Resolution No. 4749); and

RESOLVED, that MTC certifies that the foregoing recitals are true and correct and incorporated by this reference; and be it further

RESOLVED, that MTC finds that the Plan meets the requirements of Senate Bill 375 (Steinberg, 2008) as codified in California Government Code § 65080, subdivision (b); and be it further

RESOLVED, that MTC finds that the Plan complies with the requirements of all other applicable laws; and be it further

RESOLVED, that MTC does hereby adopt the Plan as included as Attachment A, as well as all associated supplemental reports, subject to additional minor or non-substantive technical corrections and editorial changes (Final Plan); and be it further

RESOLVED, that MTC directs its staff to publish the Final Plan and to submit the Final Plan to relevant state and federal agencies.

METROPOLITAN TRANSPORTATION COMMISSION

_____

Sue Noack, Chair

This resolution was entered into by the Metropolitan Transportation Commission at a special meeting of the Commission held in San Francisco, California and at other remote locations on March 25, 2026.

Date: March 25, 2026
W.I.: 1121
Referred by: Planning

Attachment A
MTC Resolution No. 4750

Final Plan Bay Area 2050+

The adopted Plan Bay Area 2050+ is on file in the offices
of the Metropolitan Transportation Commission, Bay Area Metro Center,
375 Beale Street, Suite 800, San Francisco, CA 94105.

The adopted Plan Bay Area 2050+ can also be viewed online at
https://planbayarea.org/finalplan.

PBA REVIEW: 022326

PLAN BAY AREA 2050+

PLAN BAY AREA 2050+

METROPOLITAN TRANSPORTATION COMMISSION

ASSOCIATION OF BAY AREA GOVERNMENTS

PROPOSED FINAL
Released
March 6, 2026

1274

Metropolitan Transportation Commission

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Cities of Contra Costa County

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Cities of San Mateo County

Belia Ramos
Association of Bay Area Governments

Libby Schaaf
U.S. Department of Housing and Urban Development

Association of Bay Area Governments

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Supervisor, County of Napa

Carlos Romero, Vice President
Councilmember, East Palo Alto

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Supervisor, County of Sonoma

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Supervisor, County of Santa Clara

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Daniel Lurie
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Councilmember, City of Walnut Creek

Zac Unger
Councilmember, City of Oakland

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Vacant
Cities in Alameda County

Vacant
City and County of San Francisco

Vacant
Cities in Santa Clara County

Advisory Member

Mark Ransom
San Francisco Bay Regional Water Quality Control Board

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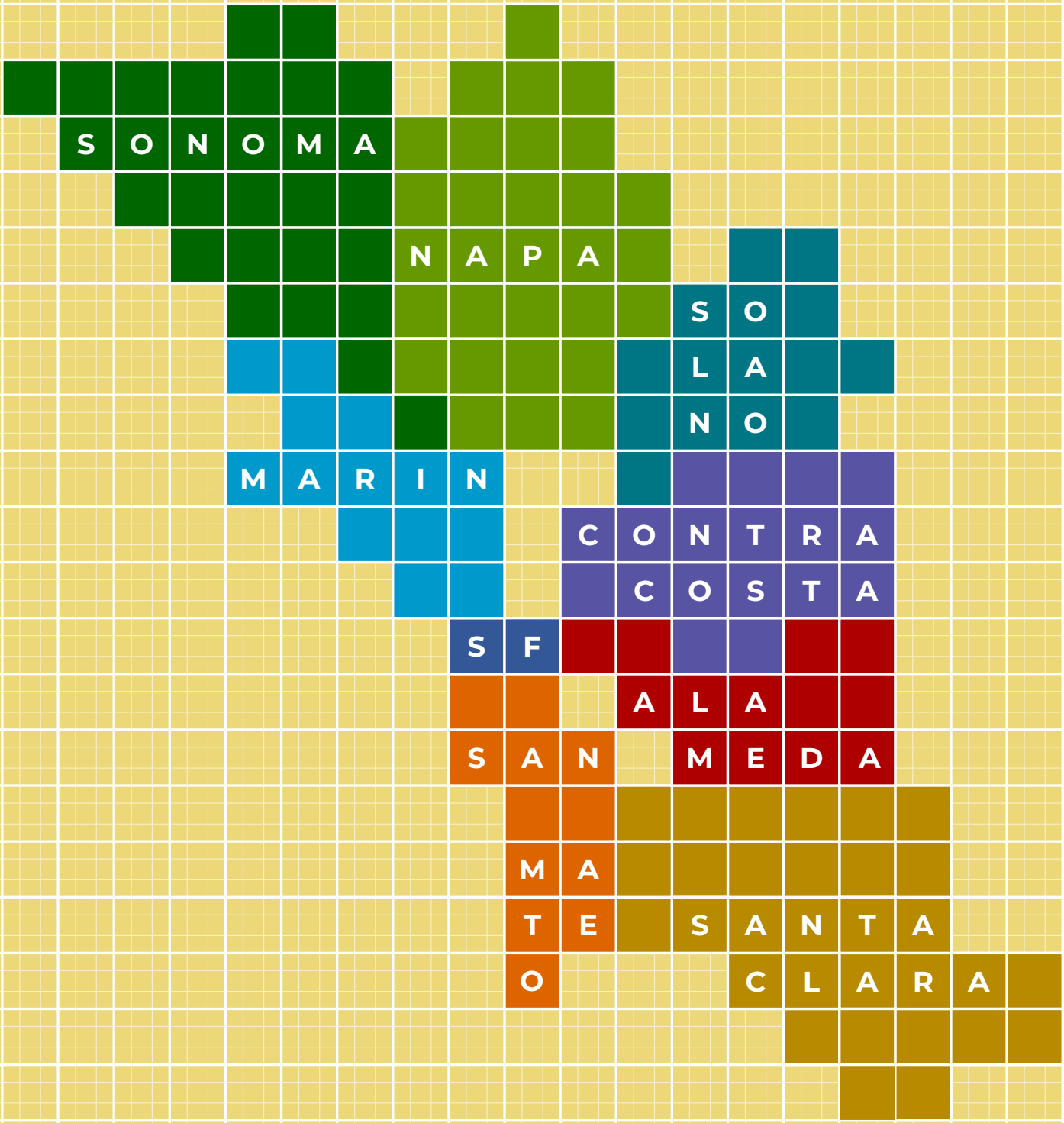
PLAN BAY AREA 2050+

METROPOLITAN TRANSPORTATION COMMISSION

ASSOCIATION OF BAY AREA GOVERNMENTS


SONOMA
NAPA
SOLANO
MARIN
CONTRA COSTA
SF
ALAMEDA
SAN MATEO
SANTA CLARA

March 2026

To the residents of the Bay Area,

For generations, the San Francisco Bay Area has been defined by residents who engage deeply in their communities. The Bay Area's legacy of innovation, inclusion and leadership has led to hard-won successes in regional transit investment, environmental protection, human rights, public health, global technological advancement and so much more. Past accomplishments, however, do not guarantee future success; instead, we must continually innovate to create the region we want to see.

Plan Bay Area 2050+ is the Bay Area's long-range regional plan to create a more affordable, connected, diverse, healthy and vibrant Bay Area for all. Today, Bay Area residents face rising costs, widening inequality, and persistent housing shortages. Our public finances have shrunk at a time when our transportation, housing and environmental needs have grown significantly.

Meeting this moment will require strong regional leadership and a willingness to make difficult, time-sensitive choices and long-term plans, together. The Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) worked closely with cities, counties and regional partners to ensure that Plan Bay Area charts a bold path for the region that is grounded in local priorities.

Since the adoption of Plan Bay Area 2050 in 2021, new data have reshaped our understanding of regional challenges. Informed by input from over 17,000 residents, community organizations, advocacy groups and public-sector partners, Plan Bay Area 2050+ clarifies how the Bay Area can advance transportation, land use and environmental goals in a time of constrained resources.

The plan also highlights concrete progress already underway. Programs such as Clipper BayPass and the MTC Mapping and Wayfinding Project are improving access to transit, while major investments in Caltrain electrification, BART's Silicon Valley extension, AC Transit's Tempo bus rapid transit, and new Express Lanes on US-101 and I-80 are strengthening regional mobility and positioning the Bay Area for future growth.

In housing, the Bay Area Housing Finance Authority is advancing long-term, stable funding for affordable housing through a potential regional housing revenue measure, while helping Bay Area residents find existing affordable units through the Doorway Housing Portal. In resilience, the plan includes the most robust assessment yet of what it will take to address the region's sea level rise adaptation needs.

To jump-start progress that delivers the bold and inclusive vision of Plan Bay Area 2050+, the plan describes 65 concrete, near-term actions to be taken over the next five years. No single organization can do this work alone. MTC and ABAG look forward to partnering with all levels of government, along with private and nonprofit partners, to deliver the bold future envisioned in this plan.

With gratitude,

Andrew B. Fremier
Executive Director

Executive Summary

Photos (L to R): Top - City of San Leandro, Joey Kotfica

Photos (L to R): Bottom - Karl Nielsen

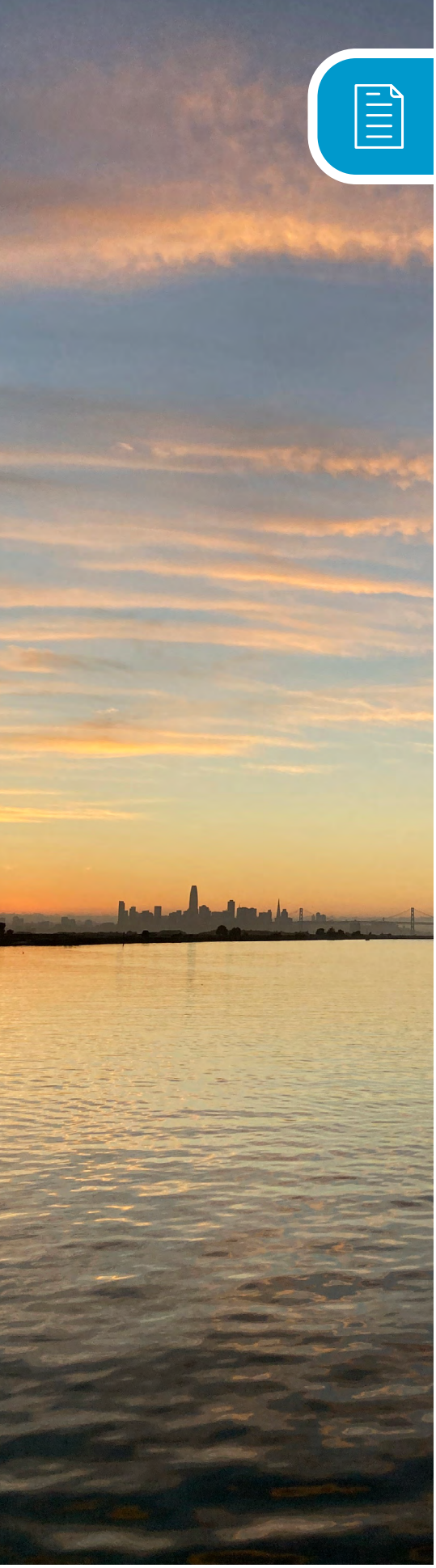


Photo: Joey Kotfica

Plan Bay Area 2050+: Executive Summary

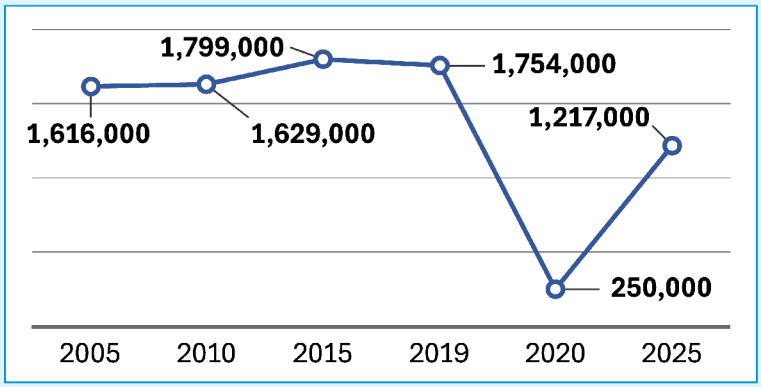
The Bay Area Today and Tomorrow

Home to over 7.5 million people, the Bay Area is known for its natural beauty, diversity and innovation. Yet the region faces mounting challenges, from the lingering economic effects of the COVID-19 pandemic to rising housing costs, struggling transit systems, persistent inequality and growing climate threats. Changing work patterns, technological advancements and climate change have all transformed the region in recent years, and by 2050, the Bay Area could see steady work-from-home rates, less demand for new office space, more autonomous vehicles and two feet of permanent sea level rise. The decisions the Bay Area makes today can strengthen the region for the decades ahead, and Plan Bay Area 2050+ is a step toward a shared vision of a stronger, more resilient future.

Regional Conditions in 2025

The pandemic disrupted Bay Area residents' travel, work and living patterns, and the long-term effects are still emerging. Transit ridership plummeted in 2020, falling from nearly 2 million to just 250,000 daily riders as many more residents worked from home. The remote work trend has persisted, with the Bay Area seeing nearly 27% of the workforce work from home in 2023, compared to 11% in 2011, leading to more commercial vacancies. Housing prices remain a top issue for Bay Area residents, as affordable homes continue to be out of reach for many with low and even moderate incomes.

Average Total Daily Bay Area Transit Boardings[1]

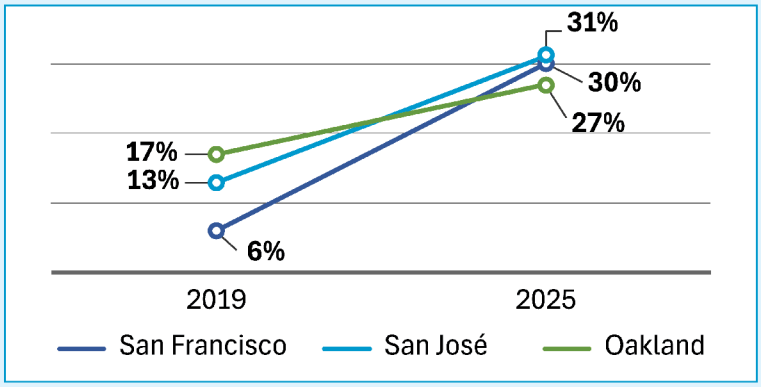


> *"Transit frequency is important, as well as higher densities around transit. More seamless transfers and fare/schedule coordination between agencies would be welcome."*
> *— San Francisco Resident*

11% Rate at which the Bay Area's workforce worked from home **in 2015**[2]

27% Work-from-home **rate in 2023**

Downtown Commercial Vacancy Rates, 2019-2025[3, 4]



> *"Remote work does not seem to be going away. How are we getting downtown office buildings filled again?"*
> *— Santa Clara County Resident*

59% of Bay Area households with incomes between $50,000 and $75,000 **did not live in an affordable home** (spent more than 35% of income on housing) in 2023[5]

1. MTC and ABAG. (February 2026). San Francisco Bay Area - National Transit Database: Demand: Average Daily Table 2005-2025. (Figures in this chart represent average daily trips in the month of April for a given year.) https://public.tableau.com/app/profile/bayareametro/viz/SanFranciscoBayArea-NationalTransitDatabase/Navigation
2. MTC. (2023). Bay Area Travel Survey.
3. Cushman & Wakefield. (2019). Market Beat: Silicon Valley Q4 2019: https://www.cushmanwakefield.com/-/media/cw/marketbeat-pdfs/2019/q4/siliconvalley_americas_marketbeat_office_q42019.pdf
4. Avalos, G. (May 2025). Downtown San Jose, Oakland, San Francisco combat empty office spaces. Mercury News. https://www.mercurynews.com/2025/05/21/economy-tech-san-jose-oakland-bay-area-office-property-jobs-develop/
5. MTC, ABAG and Partners. (June 2025). Vital Signs: Housing Affordability. https://vitalsigns.mtc.ca.gov/indicators/housing-affordability

What Is Plan Bay Area 2050+?

Informed by these trends, Plan Bay Area 2050+ aims to improve transportation, housing, the economy and the environment across the Bay Area by 2050. This long-range regional plan is a joint effort by the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) to guide growth and investment across the region's nine counties and 101 cities and towns.

This updated plan builds on Plan Bay Area 2050, adopted in 2021, to reflect new data about external forces and integrate input from thousands of residents. It identifies the policy and financial commitments needed to make meaningful progress on shared long-term planning goals, and introduces new initiatives like Transit 2050+ to confront the deep transportation and land use issues the region faces today.

Vision Statement

Plan Bay Area 2050+ maintains a bold, integrated vision for a Bay Area that is affordable, connected, diverse, healthy and vibrant for all by 2050 and takes a realistic look at how MTC and ABAG can help achieve this vision, working together with many partners in the public, private and non-profit sectors.

WHAT IS THE VISION?

AFFORDABLE

All Bay Area residents and workers have sufficient access to housing options they can afford.

CONNECTED

An expanded, well-functioning, safe and multimodal transportation system connects the Bay Area.

DIVERSE

The Bay Area is an inclusive region where people from all backgrounds, abilities and ages can remain in place with access to the region's assets and resources.

HEALTHY

The region's natural resources, open space, clean water and clean air are conserved, and residents can live and travel safely.

VIBRANT

The Bay Area is an innovation leader, creating job opportunities for all and ample fiscal resources for communities.

Photo: Karl Nielsen

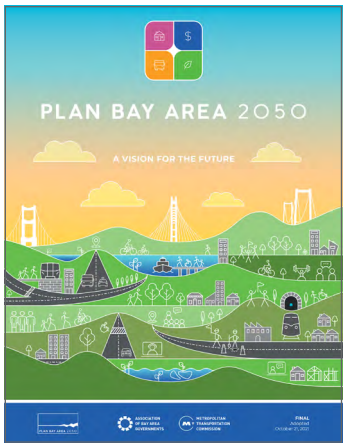
Plan Bay Area's Evolution Over Time

Plan Bay Area Adopted 2013

The first plan integrated climate, transportation and land use planning and established a shared regional emphasis on sustainability.

Plan Bay Area Adopted 2017

The second plan highlighted the regional housing crisis and emphasized inequality and disaster vulnerability.



Plan Bay Area Adopted 2021

The most recent plan expanded in scope to include four elements, 35 strategies and a detailed Implementation Plan, with a strong focus on resilience and advancing equity.

How Is the Plan Used?

Plan Bay Area 2050+ also offers practical resources for local governments and community partners, including data and mapping tools, growth forecasts and planning assumptions, and transportation and resilience project priorities. While the plan fulfills state and federal requirements as the Bay Area's official Regional Transportation Plan and Sustainable Communities Strategy, it goes beyond what's required in those plans and addresses shared challenges and opportunities that matter to residents and decision-makers alike.

Topic Area	State and Federal Requirements[6]	How Plan Bay Area 2050+ Meets and Exceeds Requirements
Regional Coordination and Timing	Update every four years. Coordinate long-range transportation, housing and land use for the region.	Transportation, housing, economy and environment together in a cohesive plan.
Community Engagement	Robust, collaborative community engagement process.	Residents from all nine counties invited to in-person and virtual events, public comment opportunities, digital platforms and surveys; focus on Equity Priority Communities.
Transportation	Produce fiscally constrained transportation network to service regional needs.	Extensive transportation strategies for all modes, including new post-pandemic transit vision via parallel Transit 2050+ effort.
Housing	Accommodate future growth at all income levels.	Comprehensive housing strategies for production, preservation and protection of the region's affordable housing stock, including funding needs and revenues to deliver housing for all.
Environment	Meet per capita greenhouse gas reduction target. Achieve air quality goals under the Clean Air Act.	Wide range of environmental strategies addressing natural hazards, open space, clean air and climate emissions.

What the Plan Does and Does Not Do

Plan Bay Area 2050+ is a long-range vision and not a financial programming document. While it does not allocate money to specific projects or strategies, it does enable transportation projects to move toward funding and construction phases. The plan does not override local land use decisions like zoning or development, and the strategies are intended to guide future planning efforts, not to impose mandates or propose legislation.

6. For California Regional Transportation Plan requirements, see Government Code Section 65080. For California Air Resources Board (CARB) Sustainable Communities Strategy requirements, see the SB 375 Regional Targets page on the CARB website. For full federal requirements, see federal statute Title 23 U.S.C. Section 134.

Photo: Karl Nielsen

Public Engagement to Inform the Plan

This plan is guided by input from thousands of Bay Area residents who shared their priorities for the future in all nine Bay Area counties. These impromptu conversations, combined with online surveys, webinars, and in-person meetings and workshops, allowed residents and many technical partners — from local governments to federal land management agencies — to provide input and help shape the plan.

17,600+
Bay Area Residents Engaged

3
Multilingual Online Surveys

1.4M+
Residents Reached through Digital Promotion

22
Community-Based Organization Partnerships

120+
Engagement Events

How Is the Plan Organized?

The plan includes 35 strategies, organized into 11 themes, under four elements: transportation, housing, economy and environment.

What is a Strategy?

In Plan Bay Area 2050+, a **strategy** is a public policy or set of investments that can be implemented in the Bay Area at the city, county, regional or state level over the next 25 years. Strategies are how the plan aims to move from vision to reality.

Implementing these strategies will require significant funding. For transportation, federal law requires that projected investments (expenditures) match expected revenues through 2050, an approach that is referred to as "fiscally constrained." In contrast, the Housing, Economy, and Environment Elements use unconstrained forecasts.

Elements, Themes, Strategies

HOW DO WE GET THERE?

Plan strategies guide growth and deliver on shared regional and local priorities through 2050.

TRANSPORTATION

Operate and maintain the existing system ("Fix It First"), create healthy and safe streets, and expand and enhance transit.

HOUSING

Produce, preserve and protect housing at all price points, especially affordable housing.

ECONOMY

Create economic mobility for all residents and improve job locations.

ENVIRONMENT

Mitigate hazards, create more parks and open spaces, and reduce climate emissions.

Theme	Transportation Strategies
Maintain and Optimize the Existing System	**T1** - Operate and Maintain the Existing System.
	T2 - Improve the Rider Experience through Transit Network Integration.
	T3 - Improve the Rider Experience through Refined Transfer Timing at Key Regional Hubs.
	T4 - Enhance Security Measures and Improve Safety and Cleanliness on Transit.
	T5 - Implement Pricing Strategies to Manage Demand.
	T6 - Modernize Freeways and Interchanges.
	T7 - Expand Freeways and Mitigate Impacts.
	T8 - Advance Other Regional Programs and Local Priorities.
Create Healthy and Safe Streets	**T9** - Build a Complete Streets Network.
	T10 - Advance Regional Vision Zero Policy through Street Design and Reduced Speeds.
Build a Next-Generation Transit Network	**T11** - Enhance Transit Frequency, Capacity and Reliability.
	T12 - Expand Transit Services throughout the Region.

Theme	Housing Strategies
Protect and Preserve Affordable Housing	**H1** - Strengthen Renter Protections.
	H2 - Preserve Existing Affordable Housing.
Spur Housing Production for Residents of All Income Levels	**H3** - Allow a Greater Mix of Housing Densities and Types in Growth Geographies.
	H4 - Build Adequate Affordable Housing to Ensure Homes for All.
	H5 - Integrate Affordable Housing into All Major Housing Projects.
	H6 - Transform Aging Malls and Office Parks into Neighborhoods.
Create Inclusive Communities	**H7** - Provide Targeted Mortgage, Rental, and Small Business Assistance to Equity Priority Communities.
	H8 - Accelerate Reuse of Public and Community-Owned Land for Mixed-Income Housing and Essential Services.

Theme	Economy Strategies
Improve Economic Mobility	**EC1** - Implement a Statewide Guaranteed Income.
	EC2 - Expand Job Training and Incubator Programs.
	EC3 - Invest in High-Speed Internet in Underserved Low-Income Communities.
Shift the Location of Jobs	**EC4** - Allow a Greater Mix of Land Uses and Densities in Growth Geographies.
	EC5 - Provide Incentives to Employers to Locate in Low-VMT Areas.
	EC6 - Retain and Invest in Key Industrial Lands.

Theme	Environment Strategies
Reduce Risks from Hazards	**EN1** - Adapt to Sea Level Rise.
	EN2 - Provide Means-Based Financial Support for Seismic, Wildfire, and Accessibility Home Retrofits.
	EN3 - Provide Means-Based Financial Support for Energy Decarbonization and Water Efficiency Upgrades in All Buildings.
Expand Access to Parks and Open Space	**EN4** - Maintain Urban Growth Boundaries.
	EN5 - Protect and Manage High-Value Conservation Lands.
	EN6 - Expand Urban Greening in Communities.
Reduce Climate Emissions	**EN7** - Expand Commute Trip Reduction Programs at Major Employers.
	EN8 - Expand Clean Vehicle Initiatives.
	EN9 - Expand Transportation Demand Management Initiatives.

> *"Bad air affects my asthmatic condition, and the wildfires generate a lot of airborne pollution. As a result, I don't walk and hike as much." — Alameda County Resident*

Photo: Karl Nielsen

Growth Geographies and Growth Pattern

Plan Bay Area 2050+ anticipates the nine counties will have nearly 1 million new households and 1.4 million new jobs by 2050. Growth Geographies are the places where the vast majority of new housing and jobs would be located under this plan. MTC and ABAG encourage growth in these locations by supporting local planning efforts, advancing regional policies and funding infrastructure investments to support infill development. Growth Geographies include:

- **Priority Development Areas (PDAs)** — Areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.
- **Priority Production Areas (PPAs)** — Industrial areas that are important to the regional economy and local middle-wage job growth. Like PDAs, PPAs are identified by local governments.
- **Transit-Rich Areas** — Places near rail, ferry or frequent bus service that were not already identified as PDAs, including all areas outside PDAs subject to MTC's Transit-Oriented Communities Policy.[7]
- **High-Resource Areas** — State-identified places with well-resourced schools, transit service and access to jobs, among other criteria.[8]

Plan Bay Area 2050+ anticipates that Growth Geographies will contain 96% of new households and 72% of new jobs. Less than 1% of new development is anticipated to occur outside local urban growth boundaries.

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7. In jurisdictions where local governments have nominated PDAs on less than 50% of the land eligible for nomination, this also includes areas within 1/2 mile of a bus stop with peak service frequency of 15 minutes or less as defined during Plan Bay Area 2050.
8. This designation only includes places that meet a baseline transit service threshold of bus service with peak headways of 30 minutes or better as defined during Plan Bay Area 2050. In addition, High-Resource Areas are only included if less than 50% of land eligible for Priority Development Area designation has been nominated by the local jurisdiction in question. Plan Bay Area 2050+ High-Resource Areas are a subset of high-opportunity areas identified statewide by the California Department of Housing and Community Development that meet a minimum transit service threshold and are located in the Bay Area. See more at: https://www.treasurer.ca.gov/ctcac/opportunity.asp

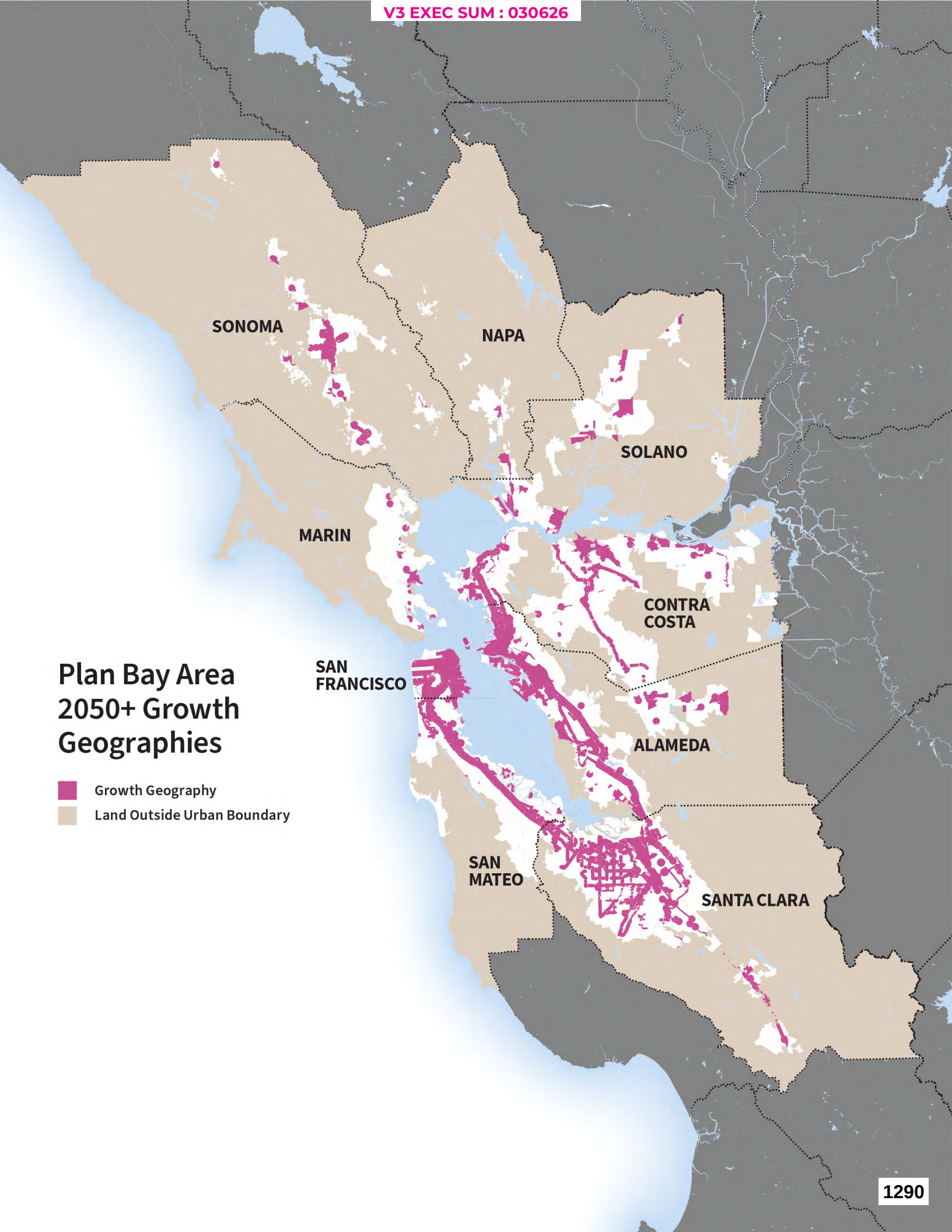

SONOMA
NAPA
SOLANO
MARIN
CONTRA COSTA
SAN FRANCISCO
ALAMEDA
SAN MATEO
SANTA CLARA
Plan Bay Area 2050+ Growth Geographies
Growth Geography
Land Outside Urban Boundary

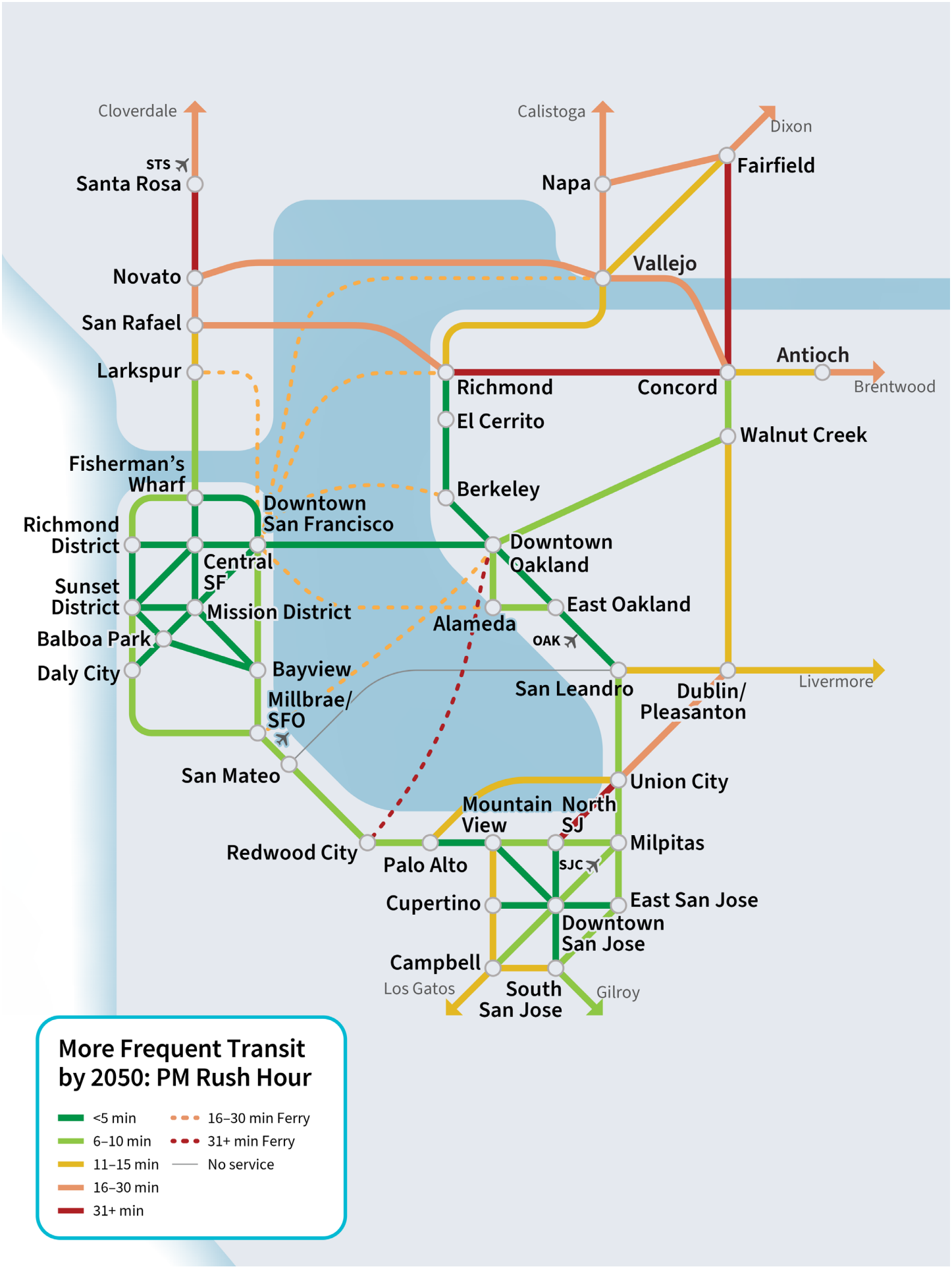
Photo: Karl Nielsen

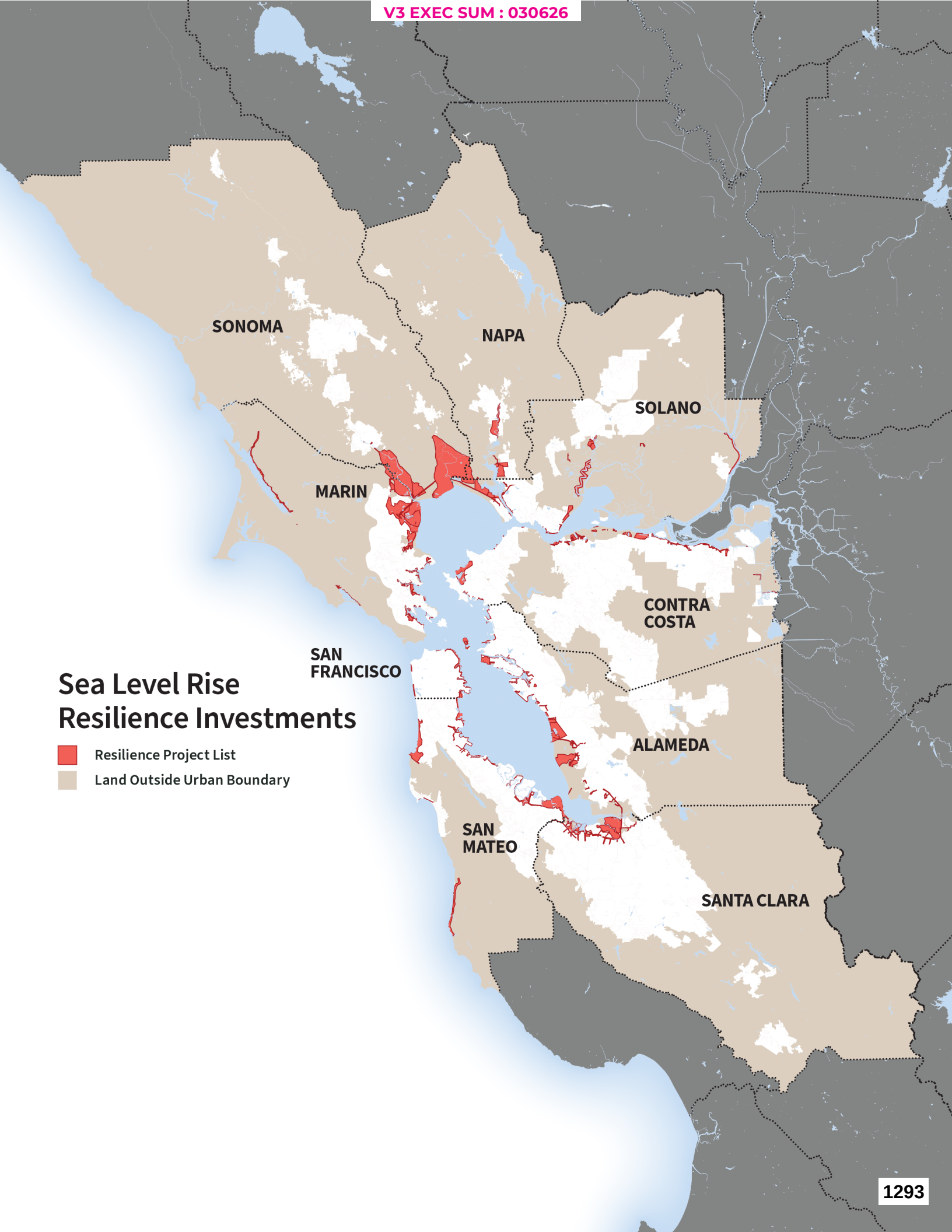
Visualizing Strategy Benefits

The plan's 35 strategies work together to provide residents greater access to transportation, housing and jobs throughout the nine counties, while protecting the Bay Area's natural resources. The strategies support a more connected, prosperous and climate-resilient region, and maps help to visualize where, geographically, benefits would be seen by 2050 under the strategies. The following maps show how select transit and environmental strategies could benefit the Bay Area. Chapter 4 provides a comprehensive overview of all plan strategies.

- Transit 2050+ was a parallel effort to reimagine regional transit, resulting in revamped transit strategies for this plan, including enhanced frequency, capacity, and reliability (Strategy T11) and expanded service (Strategy T12). The More Frequent Transit by 2050: PM Rush Hour map shows popular bus, train and ferry routes around the Bay Area, highlighting potential evening rush hour frequency improvements if these strategies are implemented.
- A strategy to adapt to sea level rise (EN1) identifies shoreline areas prioritized for protection and restoration. The Sea Level Rise Resilience Investments Map highlights planned infrastructure projects that aim to safeguard communities throughout the Bay Area.

> *"Buying a house seems completely unrealistic."*
> *— San Francisco Resident*


Cloverdale
STS
Santa Rosa
Novato
San Rafael
Larkspur
Fisherman's Wharf
Richmond District
Sunset District
Balboa Park
Daly City
Central SF
Mission District
Downtown San Francisco
Bayview
Millbrae/ SFO
San Mateo
Redwood City
Palo Alto
Mountain View
North SJ
SJC
Milpitas
Cupertino
East San Jose
Downtown San Jose
Campbell
Los Gatos
South San Jose
Gilroy
Calistoga
Napa
Vallejo
Dixon
Fairfield
Richmond
El Cerrito
Berkeley
Concord
Antioch
Brentwood
Walnut Creek
Downtown Oakland
East Oakland
Alameda
OAK
San Leandro
Dublin/ Pleasanton
Livermore
Union City
More Frequent Transit by 2050: PM Rush Hour
<5 min
6–10 min
11–15 min
16–30 min
31+ min
16–30 min Ferry
31+ min Ferry
No service


SONOMA
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MARIN
CONTRA COSTA
SAN FRANCISCO
ALAMEDA
SAN MATEO
SANTA CLARA
Sea Level Rise Resilience Investments
Resilience Project List
Land Outside Urban Boundary

Outcomes by 2050

The plan promotes more housing, faster commutes, vibrant downtowns and access to nature. It supports safety, economic opportunity and secure housing for those most in need, and better connects people through transit, roads and trails. If fully implemented, it would make the Bay Area more affordable, connected, diverse, healthy and vibrant.

AFFORDABLE

By 2050, the combined housing and transportation cost burden for all Bay Area households could decrease by 25%, while for low-income households, this cost-burden reduction could reach 50%.

CONNECTED

The share of households near frequent transit across the Bay Area could increase by 45% under plan strategies, and the number of jobs accessible via transit, biking or walking is projected to increase by 40%.

DIVERSE

The plan could increase the rate of homeownership for low-income households by 30% by 2050.

HEALTHY

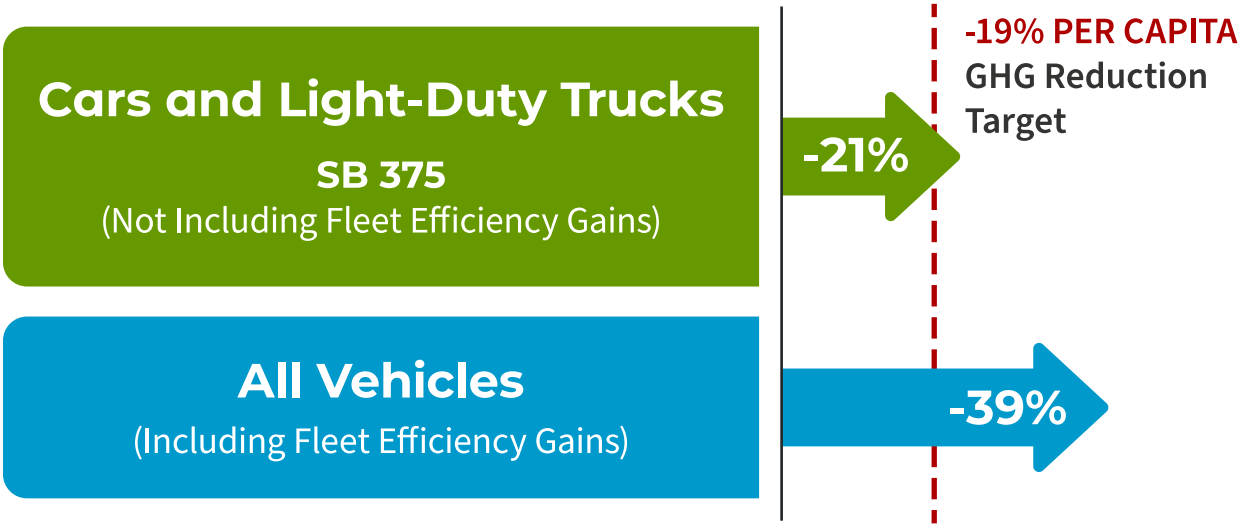
More than twice as many people could commute via transit, biking or walking if the plan's strategies are implemented, leading to a 110% increase in the share of people taking more sustainable commutes by 2050. Fatalities and injuries could go down, while publicly available open space could increase by 25%.

VIBRANT

The plan could lead to stronger economic growth and recovery regionwide and a projected 60% increase in gross regional product.

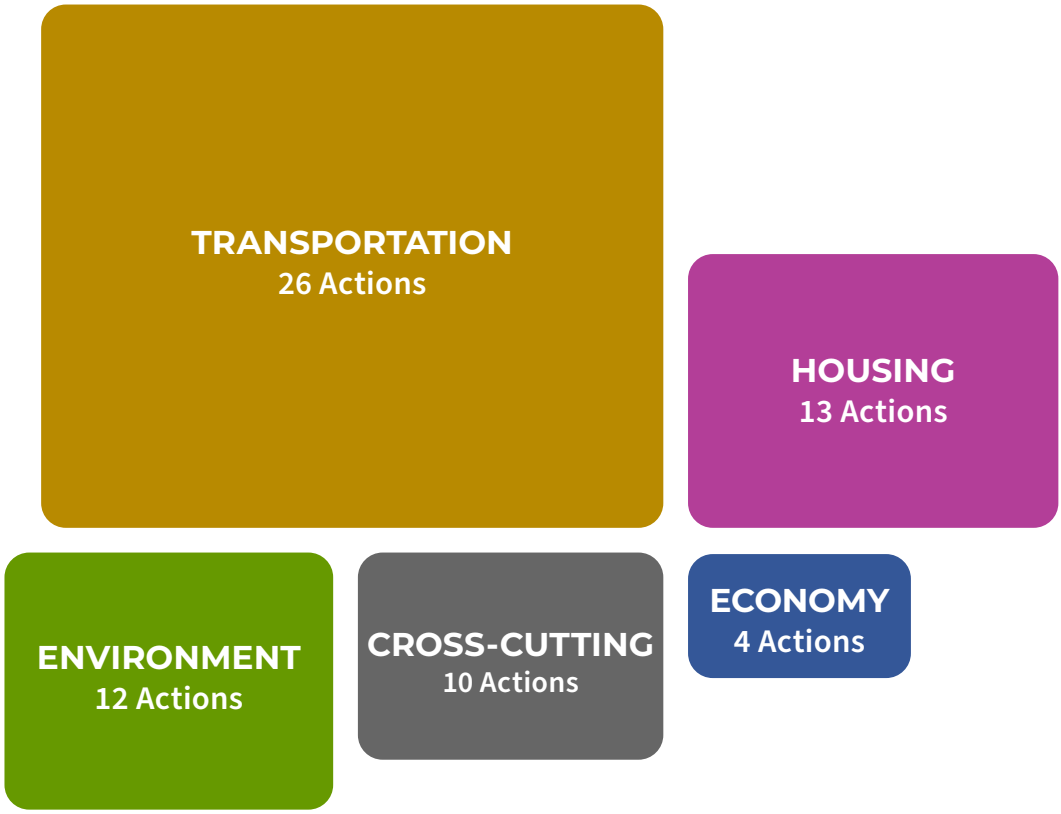
GHG Emissions Target

The plan achieves a 21% per capita reduction of greenhouse gas emissions by 2035, exceeding the 19% target set by the California Air Resources Board.



Pivoting to Implementation

The Implementation Plan focuses on concrete actions that MTC and ABAG can advance in partnership with other organizations and policymakers by 2030. **Implementation actions** are the steps to be taken in the next four years to make progress on the strategies. They identify the ***who***, ***what***, ***where***, ***when*** and ***how***; include **65 actions** for MTC and ABAG through 2030; and aim to address equity in various ways.



Action Highlights

Key MTC and ABAG implementation priorities through 2030 include securing resources to sustain progress, delivering on existing commitments and transitioning pilot programs into long-term initiatives. MTC and ABAG are involved in funding, planning, coordinating, assisting with, delivering on and advocating for these 65 actions to various degrees.

Fund and Advocate

To secure new financial resources, MTC supported Senate Bill 63 (Wiener/Arreguín), which authorizes a regional measure on the November 2026 ballot to sustain and improve Bay Area transit. MTC and ABAG are also preparing for a potential 2028 housing revenue measure — through the Bay Area Housing Finance Authority (BAHFA) — to address the Bay Area's ongoing housing affordability crisis. This measure would expand the reach and impact of already successful BAHFA pilot programs, allowing more residents to access stable, affordable homes. The agencies will also pursue near-term funding to sustain existing regional housing programs and respond to local needs.

Plan and Coordinate

MTC and ABAG play essential planning and coordination roles in many actions. In transportation, MTC plans to support easier, more seamless transit use regionwide by expanding both the Clipper BayPass program for commuters and the Regional Mapping and Wayfinding Project for regular and new riders. By 2030, MTC also intends to support the planning and design of active transportation projects that accommodate all ages and abilities, contributing to healthier communities where people can walk and bike more. Other planning and coordination priorities include analyzing post-COVID shifts in travel, work and development patterns; updating the San Francisco Bay Area Goods Movement Plan to reflect these post-pandemic trends; and refreshing the Equity Priority Communities framework.

Deliver and Assist

These implementation actions also help MTC and ABAG to deliver on previous commitments and assist other organizations with work that supports plan strategies. The agencies commit to enhancing and expanding the Doorway Housing Portal to help residents find affordable housing. To support housing and business development near transportation, MTC and ABAG will monitor implementation of MTC's Transit-Oriented Communities (TOC) Policy by 2030.

MTC and ABAG also partner with the San Francisco Estuary Partnership and the San Francisco Bay Conservation and Development Commission to help communities deliver on initiatives that address sea level rise and climate impacts. The Bay Area Regional Energy Network is also building energy efficiency and resilience programs for both renters and property owners.

Photo: Karl Nielsen

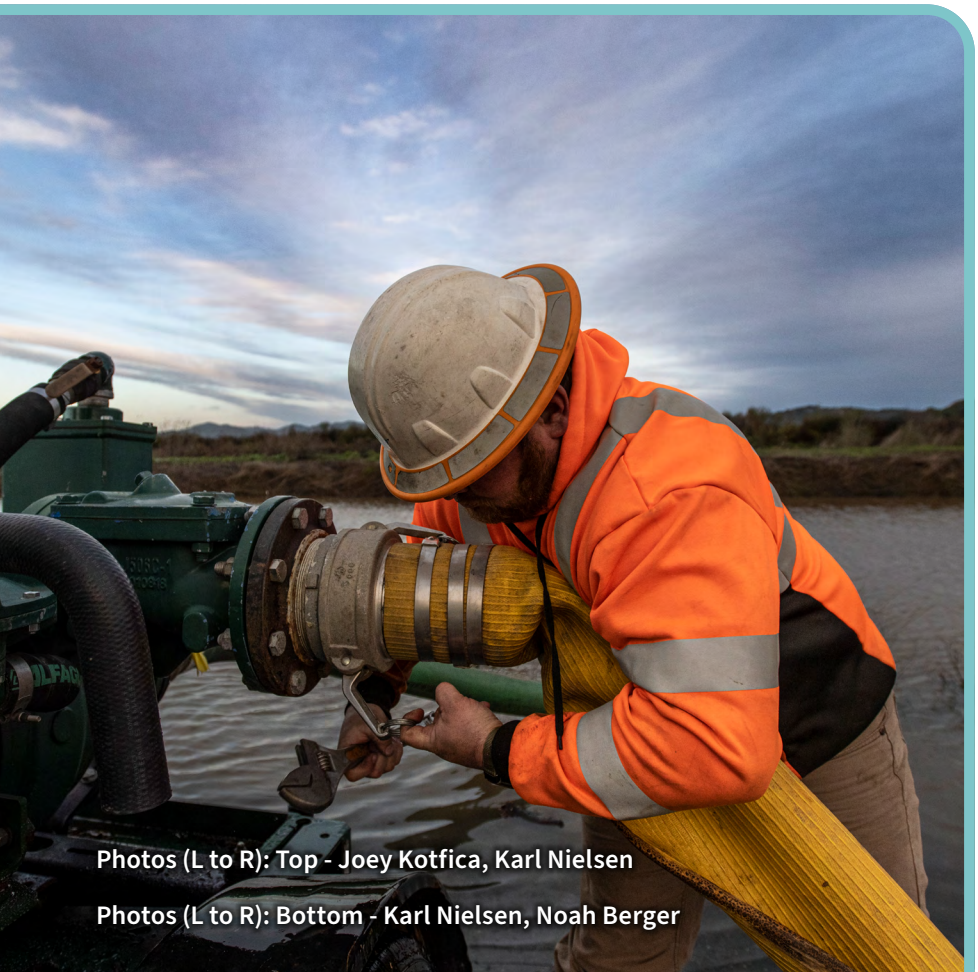
2060 and Beyond

Regional agencies cannot implement the plan alone. Progress will depend on strong partnerships and ongoing collaboration with local governments, community organizations and other stakeholders. Together, the region can advance shared priorities in transportation, housing, the economy and the environment to build a more affordable, connected, diverse, healthy and vibrant Bay Area for future generations. Work is already underway on Plan Bay Area 2060, the next major plan update, which will wrestle with urgent and emerging policy issues, including different funding and growth trajectories for the region, changing demographics and the impact of technological advances in artificial intelligence and autonomous vehicles, among other areas.

Stay Involved

Opportunities to stay involved are ongoing throughout the plan development process. All interested members of the public can sign up to receive newsletter updates and other announcements by visiting: **https://planbayarea.org/get-involved/mailing-list**.

1 | Meeting the Moment



Photos (L to R): Top - Joey Kotfica, Karl Nielsen

Photos (L to R): Bottom - Karl Nielsen, Noah Berger

Stronger Together: The San Francisco Bay Area

Photo: Joey Kotfica

With over 7.5 million people calling the San Francisco Bay Area home, our region is celebrated worldwide for its stunning vistas and thriving cultures. Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma counties have attracted residents and visitors alike for centuries with natural beauty, good weather, and a legacy of progress. Industry leadership, environmental stewardship, thriving arts and cultures, and social justice movements are all hallmarks of Bay Area life, with residents consistently stepping up to tackle challenges and advocate for change.

Today's Bay Area, however, stands at a crossroads. Housing is unaffordable to many residents — and especially to those with low incomes. Traffic conditions are getting worse as transit struggles to regain ridership. Income inequality persists, and once vibrant downtowns face slow economic recovery in the wake of a global pandemic.[1] The impacts of climate change threaten our communities; sea level rise poses risks to housing, businesses and infrastructure; and natural disasters such as wildfires are expected to become more frequent and unpredictable.

1. Thorman, T., & Payares-Montoya, D. (2023). Income inequality in California. https://www.ppic.org/publication/income-inequality-in-california/

Advancing Shared Local and Regional Priorities

The policy decisions made today can strengthen the region for decades to come, but Bay Area governments must rebuild trust with residents through clear communication of priorities. By acknowledging past successes and shortcomings and engaging with communities to inform priorities, the Bay Area's public agencies can cultivate common goals between and across the region's diverse local communities. Long-range plans, such as this document, serve to articulate these shared, regional goals and, ultimately, influence strategic policy decisions and action.

As regional government agencies, the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG) aim to foster a shared long-range vision for the Bay Area's future that meets the needs of 101 different cities and towns and nine counties. Plan Bay Area 2050 was developed as the region's long-range plan during the pandemic and was adopted by MTC and the ABAG Executive Board in 2021. It was a major plan update that established a bold new vision for the region and outlined 35 strategies, all stress-tested against a number of future scenarios, to achieve a vision of a more equitable and resilient Bay Area.

Plan Bay Area 2050+, a limited and focused update to the current plan, builds on Plan Bay Area 2050's analysis, integrates recent data on societal trends since 2021, and helps us better understand how the Bay Area could change through 2050. Also included in this plan update is new analysis about the money needed and available to support long-term strategies in the coming decades. The plan's 35 strategies have been updated and, in some cases, completely redesigned. This plan looks to the future while also striving to meet a difficult present moment with hope and resilience.

State of the Region: Where Are We Now?

Plan Bay Area 2050 established a vision for the region by listening to Bay Area communities about their long-term priorities across four areas, or **elements: transportation, housing, the economy and the environment**. For Plan Bay Area 2050+, we maintain these elements and Plan Bay Area 2050's adopted vision statement:

> To ensure that by the year 2050 the Bay Area is more **affordable**, **connected**, **diverse**, **healthy** and **vibrant**.

During public engagement in 2023, Bay Area residents expressed an overall sense of concern, hopelessness and helplessness across the four elements. The uphill battle the region faces in the four areas is borne out by the data explored in this chapter and by community members' comments. More recent community engagement in 2024 and 2025, however, suggests that residents are feeling slightly more optimistic and willing to support bold strategies. More specifically, many communities prioritized improving transit, increasing the Bay Area's supply of affordable housing, creating middle-class job opportunities near transit, and spearheading multi-jurisdictional collaboration to address sea level rise.

The five dashboards that follow provide a snapshot of the Bay Area today, while community members' words provide examples of how residents feel. After describing where the region stands today, subsequent chapters explain what the plan is and why it was developed; outline major assumptions; recommend 35 strategies to make the Bay Area more affordable, connected, diverse, healthy and vibrant; and detail potential outcomes if strategies are implemented by 2050. A final chapter delves into the actions and partnerships required to enact these strategies.

AFFORDABLE

Housing affordability persists as one of the Bay Area's biggest regional concerns, with San José and San Francisco routinely ranked among the most expensive cities in the country. In 2022, national mortgage and inflation rates both hit multi-decade highs, putting homeownership and market-rate rentals out of reach for many Bay Area residents, especially those with low incomes.[2,3] At the regional scale, MTC and ABAG in 2024 proposed a historic $20 billion ballot measure intended to generate funding to build and secure more affordable housing throughout the Bay Area's nine counties. Anticipated public support was not high enough before the election, so the measure was ultimately withdrawn with the intention to reconsider its placement on the ballot in a future election year. Nonetheless, MTC and ABAG laid important groundwork on collaborative momentum toward a future housing measure.

In the absence of committed housing funding at the regional, state or federal levels, individual jurisdictions have been levying their own taxes in recent decades. Several Bay Area cities and counties brought their own "self-help" housing funding measures to voters, including San Mateo County's passage of a countywide 1/2-cent sales tax to contribute to affordable housing funding in 2016, and Alameda County's and San Francisco's passage of general obligation bonds to address the issue.

Communities are also meeting state and local requirements connected to the Regional Housing Need Allocation (RHNA) process. Every eight years, ABAG per state law allocates a specific housing target to each Bay Area city and county, requiring them to create more housing opportunities through revised Housing Elements and local rezoning efforts. Berkeley, for example, has densified as its population continues to grow; San Francisco has built new housing on Treasure Island; and Redwood City has built out a vibrant downtown.

59% of Bay Area households with incomes between $50,000 and $75,000 did not live in an affordable home (spent more than 35% of income on housing) in 2023[4]

$817,000
Average development cost per affordable housing unit across the nine Bay Area counties[5]

55,147
Number of **housing units** (across all income levels) needed per year across the nine Bay Area counties, 2023-2031[6]

25,735
Average housing units permitted per year in the region from 2018-2023[7]

2. Freddie Mac. (2025, May 19). Primary Mortgage Market Survey® U.S. weekly averages as of 05/15/2025: All. https://www.freddiemac.com/pmms
3. U.S. Bureau of Labor Statistics. (2025, May 19). 12-month percentage change, Consumer Price Index, selected categories (past 20 years). https://www.bls.gov/charts/consumer-price-index/consumer-price-index-by-category-line-chart.htm
4. MTC, ABAG and Partners. (2025, June 13). Vital Signs: Housing Affordability. https://vitalsigns.mtc.ca.gov/indicators/housing-affordability
5. Bay Area Housing Finance Authority and Enterprise Community Partners. (2024). Bay Area Affordable Housing Pipeline, May 2024: Ready to Build an Affordable Future. https://mtc.ca.gov/sites/default/files/meetings/attachments/6021/09a_3_Attachment_B_Bay_Area_Affordable_Housing_Pipeline_Brief_v2.pdf
6. ABAG. (2021). Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031. https://abag.ca.gov/sites/default/files/documents/2021-12/Final_RHNA_Allocation_Report_2023-2031-approved_0.pdf
7. California Department of Housing & Community Development. (2025, June 13). Housing Element Implementation and APR Dashboard. https://www.hcd.ca.gov/planning-and-community-development/housing-element-implementation-and-apr-dashboard

Photo: Joey Kotfica

What We Heard From Community Members

Conversations with Bay Area residents in randomized polls and workshops reveal profound frustration about the cost of housing, with many residents saying they are considering leaving the region due to housing unaffordability. People noted that more affordable housing needs to be built and expressed hopelessness about being able to buy a home.

"Bay Area is no longer affordable and I will probably move away within two years, although I was born and raised in the city of San Francisco." — San Mateo County Resident

"There is far too little affordable housing for the people who work in Sonoma County. Without housing we won't have workers, and without workers the economy will wither and the population will decline." — Sonoma County Resident

"Most of the homeless population in California came from California. Many of those people even have jobs. The cost of housing is too high. I see many luxury condo buildings sitting empty for months and months. We need more affordable housing." — Alameda County Resident

"Buying a house seems completely unrealistic." — San Francisco Resident

CONNECTED

The Bay Area's buses, trains and ferries, as well as our iconic cable cars and streetcars, form one of the most robust transit systems in the United States. This system offers a congestion-reducing, environmentally friendly alternative to driving for hundreds of thousands of residents per day. The pandemic dealt a serious and unprecedented blow to transit operations in the Bay Area, resulting in a steep decline in transit ridership that has yet to rebound from long-term work-from-home trends following initial stay-at-home orders.

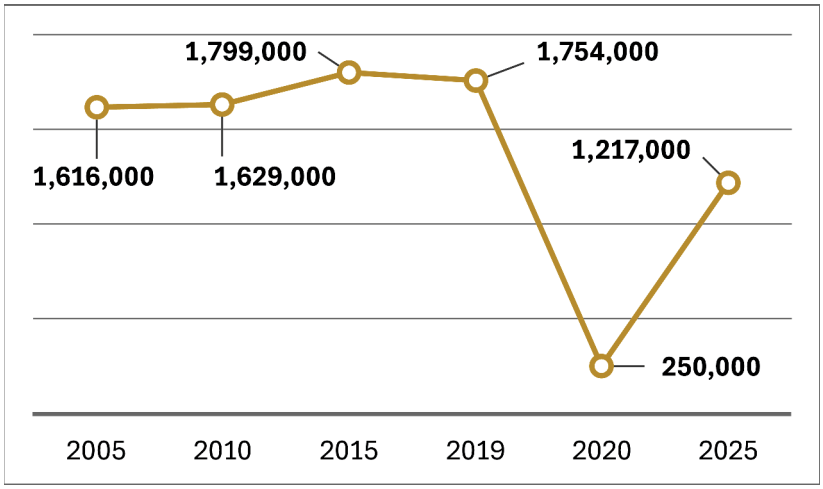
As of 2025, the region's transit systems continue to struggle financially, with an estimated deficit of $3.7 billion across five of the largest transit agencies from 2026 through 2030. Although non-commute transit patterns have nearly reached pre-pandemic levels, commute transit patterns have not rebounded as quickly. Many workers now connect to their jobs and coworkers virtually, and when traveling to a place of employment, workers across sectors choose to drive, particularly if they must travel long distances. According to MTC's 2023 Bay Area Travel Study,[8] residents who work outside their homes use transit for both commute and non-commute trips at a higher rate than those who work from home. Additionally, residents with low incomes rely more heavily on transit.

To address transit affordability, which contributes to commuters' decisions and long-term patterns, MTC in partnership with Bay Area transit agencies launched two recent Clipper programs. Clipper® START, launched June 2020, provides a 50% fare discount to low-income transit riders, while Clipper® BayPass, launched in 2022, allows employers to provide their employees with a pass for unlimited travel on all Bay Area buses, trains and ferries.

For most Bay Area drivers, freeways are becoming increasingly congested and at different times of day. Traffic congestion is no longer limited to rush hour, as delays worsen outside of traditional commute times and on weekends; in fact, weekday morning commute congestion is down, but traffic has grown enough at midday and evenings to make up for overall congestion levels. Despite more congested roadways, both commute and non-commute trips have declined with the rise in remote work since the pandemic.

With greater road usage, Bay Area residents want to see better road and freeway maintenance. Beyond cars, Bay Area roads are also important sites for other transportation and recreation needs, as residents of all ages and abilities walk, roll and bike on their neighborhood streets. Pedestrian- and bike-friendly infrastructure, which currently make up a network of over 3,200 miles of active transportation paths and roads regionwide, are crucial components for connectivity.

Figure 1-1. Average Total Daily Bay Area Transit Ridership Boardings[9]



8. Metropolitan Transportation Commission. (2026). Bay Area Travel Study Dashboard: 2019–2023.
9. MTC and ABAG. (February 2026). San Francisco Bay Area - National Transit Database: Demand: Average Daily Table 2005-2025. (Figures in this chart represent average daily trips in the month of April for a given year.) https://public.tableau.com/app/profile/bayareametro/viz/SanFranciscoBayArea-NationalTransitDatabase/Navigation

49%
Decrease in weekday morning commute freeway delays in the Bay Area between January 2020 and June 2025[10]

17%
Increase in weekend freeway delays in the Bay Area between January 2020 and June 2025[11]

27% of the **Bay Area's workforce** worked from home in 2023, as compared to 11% of the workforce in 2015[12]

19,000 Number of **Clipper START enrollees** as of March 2023

What We Heard From Community Members

In speaking with Bay Area residents through community engagement, transit improvements — especially frequency — were a central theme of transportation-related comments. Participants also talked about their changes in travel behavior since 2020 and wanted to see bike- and pedestrian-focused improvements.

"We need more public transportation that is frequent, safe, dependable and fast enough that people decide not to drive." — Santa Clara County Resident

"I like our local buses and the ferry, but the buses are inefficient for anything but neighborhood trips." — Napa County Resident

"Walkable neighborhoods would be great in Solano County." — Solano County Resident

"Bikes and walking paths need to be better. Wider, cleaner and the people that design them need to USE them." — Marin County Resident

"I am required to drive for work. I invested in an EV." — San Francisco Resident

"I ride BART. I have to drive to the station and park, because the options to get there via other modes are impractical." — San Joaquin County Resident Working in San Francisco

10. Caltrans. (2025). Performance Measurement System (PEMs) Data https://dot.ca.gov/programs/traffic-operations/mpr/pems-source
11. Ibid.
12. Ibid.

DIVERSE

The Bay Area is lauded for the diversity of its people and cultures. For generations, the region has been a place where people of different identities, backgrounds and incomes could build a life for themselves and their loved ones. Increasingly, however, persistent income inequality is making the Bay Area a more difficult place to live. Between 1970 and 2021, the Bay Area's median income increased by 25%, but this period also saw low incomes shrink while the highest incomes grew. With fewer people earning a middle-class income, many Bay Area residents are leaving their longtime neighborhoods. Pandemic-related population shifts starting in 2020 exacerbated displacement of residents with low incomes and people of color from the region's major cities (Oakland, San Francisco and San José) into more affordable suburban or out-of-region communities.

Across the region, major cities, suburbs and rural areas are changing as income inequality grows. Urban centers are increasingly home to both the lowest- and highest-income residents, and homelessness is growing across all nine Bay Area counties. Homeownership continues to be out of reach for many residents, with financial barriers differing starkly across racial and ethnic lines. The region's population is also aging at a rate faster than any other U.S. metro, with over half of residents in 2050 expected to be 50 and older. As younger residents leave the Bay Area, communities will need to address the livability and economic concerns of an aging population.

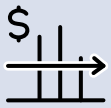
34% **Rate** at which inflation-adjusted **incomes grew** for the Bay Area's highest-earning households, 1970-2021[13]

14% **Rate** at which inflation-adjusted **incomes decreased** for the Bay Area's lowest-earning households, 1970-2021[14]

38,000+

Number of **unhoused people** in the Bay Area in 2024[15]

2X **Per capita median income** of white Bay Area residents compared to the median incomes of Hispanic/Latino, Indigenous and Black residents[16]



3rd

The Bay Area is **the third oldest metro area** in the U.S., with a median age of 41, with its population aging faster than any other metro area[17]

13. MTC, ABAG and Partners. (June 2025). Vital Signs: Income. https://vitalsigns.mtc.ca.gov/indicators/income#
14. Ibid.
15. Varian, E. (January 2025). Bay Area homeless population rose to a record 38,891 people in 2024. The Mercury News. https://www.mercurynews.com/2025/01/05/bay-area-homeless-population-2024/
16. Bay Area Council Economic Institute. (2024). Racial Equity in the Bay Area: How closing racial gaps can result in broad economic gain for the region. https://www.bayareaeconomy.org/files/pdf/RacialEquityInBayArea-Mar2024-Web.pdf
17. Kopf, D., Li, R., Sumida, N. (2025, July 14). This is the real doom loop. It will change everything about life in the Bay Area. San Francisco Chronicle. https://www.sfchronicle.com/projects/2025/sf-bay-area-aging-demographics/

Photo: Dan Krauss

Equity and Equity Priority Communities

MTC and ABAG strive to advance equity, defining it as "just inclusion in a Bay Area where everyone can participate, prosper and reach their full potential." This requires careful consideration of investments and policies that affect historically and systemically marginalized, disadvantaged and excluded groups, including people with low incomes, people with disabilities and communities of color.

MTC and ABAG's Equity Platform, adopted in 2023, is grounded in a commitment to meaningfully reverse disparities in access and dismantle systemic exclusion. In 2024, the agencies adopted a mission statement to advance shared local and regional priorities for transportation, housing and the environment, along with its vision and values to get there. Values include:

- **Collaboration:** Commitment to partnership and valuing all voices and perspectives.
- **Equity:** Advancing a fair, just and inclusive Bay Area through policies, actions and investments.
- **Excellence:** Commitment to high-quality work products and services.
- **Innovation:** Commitment to continuous improvement through the exploration of new tools, technologies and approaches.
- **Integrity:** Be transparent, accountable and responsible in providing information and making decisions.

MTC and ABAG use Equity Priority Communities to focus and assess equity investments across several planning, analysis and funding programs in the region. Equity Priority Communities are geographic areas that have a concentration of both residents of color and residents with low incomes, or that have a concentration of residents with low incomes and other factors such as limited English proficiency, older people or people with disabilities. **Equity Priority Communities are further explained in Chapters 4 and 5.**

HEALTHY

While one of the Bay Area's primary draws is its beautiful open spaces, access to parks and open space is not evenly distributed throughout the region, as wealthier residents often enjoy more parks and urban green spaces that contribute to healthier lifestyles. Car-oriented communities also affect residents' health and safety through car crashes and sedentary lifestyles, while housing near refineries or freeways makes certain communities more vulnerable to health-threatening climate emissions than others.

Extreme weather events and natural hazards also threaten the safety of entire communities. Wildfires, drought and earthquakes are frequent events in northern California, raising questions about whether residents can stay in their homes. As the Bay Area grapples with these natural events and their consequences, new practices, policies and investments can strengthen the resilience of homes, neighborhoods and the entire region.

48%

Increase in the number of Bay Area fatalities from car crashes, 2010-2020[18]

5/100

The region has lost **5 homes to wildfires for every 100 homes built** over the past decade[19]

20%

Reduction in carbon dioxide emissions per capita from all vehicles between 2005 and 2023[20]

50 million Tons of greenhouse gas emissions

attributable to transportation and energy consumption by Bay Area residents in 2015[21]

60%

Percentage of the region's **shoreline at risk from sea level rise that has early stage, locally identified adaptation approaches**, while the remaining 40% still requires preliminary planning[22]

18. MTC, ABAG and Partners. (2025). Vital Signs: Fatalities from Crashes. https://vitalsigns.mtc.ca.gov/indicators/fatalities-from-crashes
19. MTC and ABAG internal research; unpublished. (2025).
20. MTC and ABAG. (2025). Final Blueprint Compendium. https://planbayarea.org/digital-library/7aiii-25-0589-attachment-b-final-blueprint-compendiumpdf
21. MTC, ABAG and Partners. (2025). Vital Signs: Greenhouse Gas Emissions. https://vitalsigns.mtc.ca.gov/indicators/greenhouse-gas-emissions
22. MTC and ABAG. (2025). Resilience Project List Report. https://planbayarea.org/finalplan

Photo: Karl Nielsen

What We Heard From Community Members

Feedback from Bay Area residents highlighted that health and safety are still top of mind in the post-pandemic period. While individuals recognized the health benefits of being outside during the pandemic, the environment also can be a source of health risks — both on an individual and regional scale.

"The temperature gets higher every year and there's a higher chance for wildfires."
— Contra Costa County Resident

"Nature/parks/open spaces is a climate strategy that helps to reduce GHG emissions."
— San Francisco Resident

"I spent a lot more time outside my house (in the yard) and saw a lot more of my neighbors than before. Some of those connections have persisted. During the lockdown stages of the pandemic, it was really easy and safe to get around my neighborhood walking or on my bike. Now that the traffic is back, it's difficult again. I saw so many people out walking around; it was great." — Contra Costa County Resident

"Bad air affects my asthmatic condition, and the wildfires generate a lot of airborne pollution. As a result I don't walk and hike as much." — Alameda County Resident

VIBRANT

Despite a generally strong economy and a global reputation for technological innovation, the Bay Area's economic vibrancy has dimmed in many downtowns and commercial areas since the onset of the COVID-19 pandemic. Beyond the immediate impacts of shelter-in-place orders in the early 2020s, the lasting economic effects of the pandemic continue to affect workers and employers across the nine counties, leading to persistently high commercial vacancy rates.

Pandemic-related population and job declines from 2020 through 2023 greatly affected the regional economy, but since 2023, every Bay Area county except San Francisco has gained people. Amid changes at the federal level and continued high interest rates, the Bay Area lost thousands of jobs across the nine counties as of spring 2025, creating more uncertainty for its economic future . Although the region largely recovered from pandemic-related job losses by 2022, data from 2024 shows that the Bay Area is not yet back to its peak average employment level of 2019.

The Bay Area's vibrancy depends on its people and whether they can build a quality life in the region. As people leave the region due to unaffordability, the Bay Area may not continue to be the economic powerhouse of the past. Stable jobs with livable wages are needed for people to remain in the area, with full physical and digital access to job opportunities.

18,500

Number of people gained in the Bay Area, **2023-2025**[23]

80+

Hours per week required for someone making **minimum wage** to afford an average one-bedroom unit in the Bay Area[24]

1.5%

Fewer jobs in 2024 compared to the 2019 peak of annual average employment[25]

12%

Average combined vacancy **rate for office space in downtown** San Francisco (6%), San José (13%) and Oakland (17%), Fourth Quarter, **2019**[26]

29%

Average combined vacancy **rate for office space in downtown** San Francisco (30%), San José (31%) and Oakland (27%), First Quarter, **2025**[27]

23. State of California, Department of Finance. (May 2025). E-1 Population Estimates for Cities, Counties and the State with Annual Percent Change — January 1, 2024 and 2025. https://dof.ca.gov/forecasting/demographics/estimates-e1/
24. National Low Income Housing Coalition. (2025). Out of Reach: The High Cost of Living. https://nlihc.org/oor
25. U.S. Bureau of Labor Statistics. (2025). Quarterly Census of Employment and Wages. https://www.bls.gov/cew/
26. Cushman & Wakefield. (2019). Market Beat: Silicon Valley Q4 2019: https://www.cushmanwakefield.com/-/media/cw/marketbeat-pdfs/2019/q4/siliconvalley_americas_marketbeat_office_q42019.pdf
27. Avalos, G. (May 2025). Downtown San José, Oakland, San Francisco combat empty office spaces. Mercury News. https://www.mercurynews.com/2025/05/21/economy-tech-san-jose-oakland-bay-area-office-property-jobs-develop/

Photo: Joey Kotfica

What We Heard From Community Members

The overwhelming majority of public comments related to economic vibrancy focused on the negative impacts of inflation and the high cost of living in the Bay Area. Residents also commented on low or stagnant wages, the job market and income inequality.

"The prices of everything are going up, and we are students working multiple jobs and cannot afford the necessities." — Alameda County Resident

"Food will be more and more expensive under climate change, and increasing income inequality will make this issue harder to handle." — San Francisco Resident

"Remote work does not seem to be going away. How are we getting downtown office buildings filled again?" — Santa Clara County Resident

Photo: Karl Nielsen

Looking to 2050: Strategies for Today and the Decades Ahead

MTC and ABAG envision a future that is responsive to, and inspired by, the needs and desires of Bay Area residents. Plan Bay Area 2050+ lays out 35 strategies to address the deep, longstanding issues affecting the Bay Area today and tomorrow — fully detailed in Chapter 4.

This plan aims to balance ambitious goals with appropriate consideration for political and financial realities, offering a roadmap for progress on residents' top priorities. Working together, the Bay Area can navigate this transient, challenging period by focusing on core, long-term priorities and delivering on shorter-term implementation actions that meet the moment, incrementally bringing us closer to a shared vision of 2050.

While housing may be unaffordable to many who live in the region now, MTC and ABAG are working on policies and investments in affordable housing protection, preservation and production so that households of all backgrounds can afford to live, work and raise their families in the Bay Area. When it comes to transportation, Plan Bay Area 2050+ lays out a path to optimize and enhance the existing transportation system while also investing in new transit and active transportation options.

To address the disproportionate rates of poverty and displacement facing people of color in the Bay Area today, Plan Bay Area 2050+ crafts policies and investments meant to help socially and economically disadvantaged areas, called Equity Priority Communities. To support conservation and access to nature, this plan advocates for more parks and open spaces by 2050 for residents to enjoy.

To promote job growth and economic opportunity, Plan Bay Area 2050+ envisions revitalized clusters of job training and employment opportunities, with employers incentivized to locate in-person jobs near these regional economic hubs and boost downtown activity by 2050.

Success will depend on sustained regional collaboration, community engagement and a shared commitment to the guiding principles of the plan. With continued focus and collective action, the Bay Area can realize a future where everyone has the opportunity to thrive. The following chapters explain more about what this plan is and does, and what kind of partnerships and actions will help us reach the shared vision of a more affordable, connected, diverse, healthy and vibrant Bay Area.

Photo: Karl Nielsen

Where We've Been, Where We're Going: Milestones in Bay Area Regional Collaboration

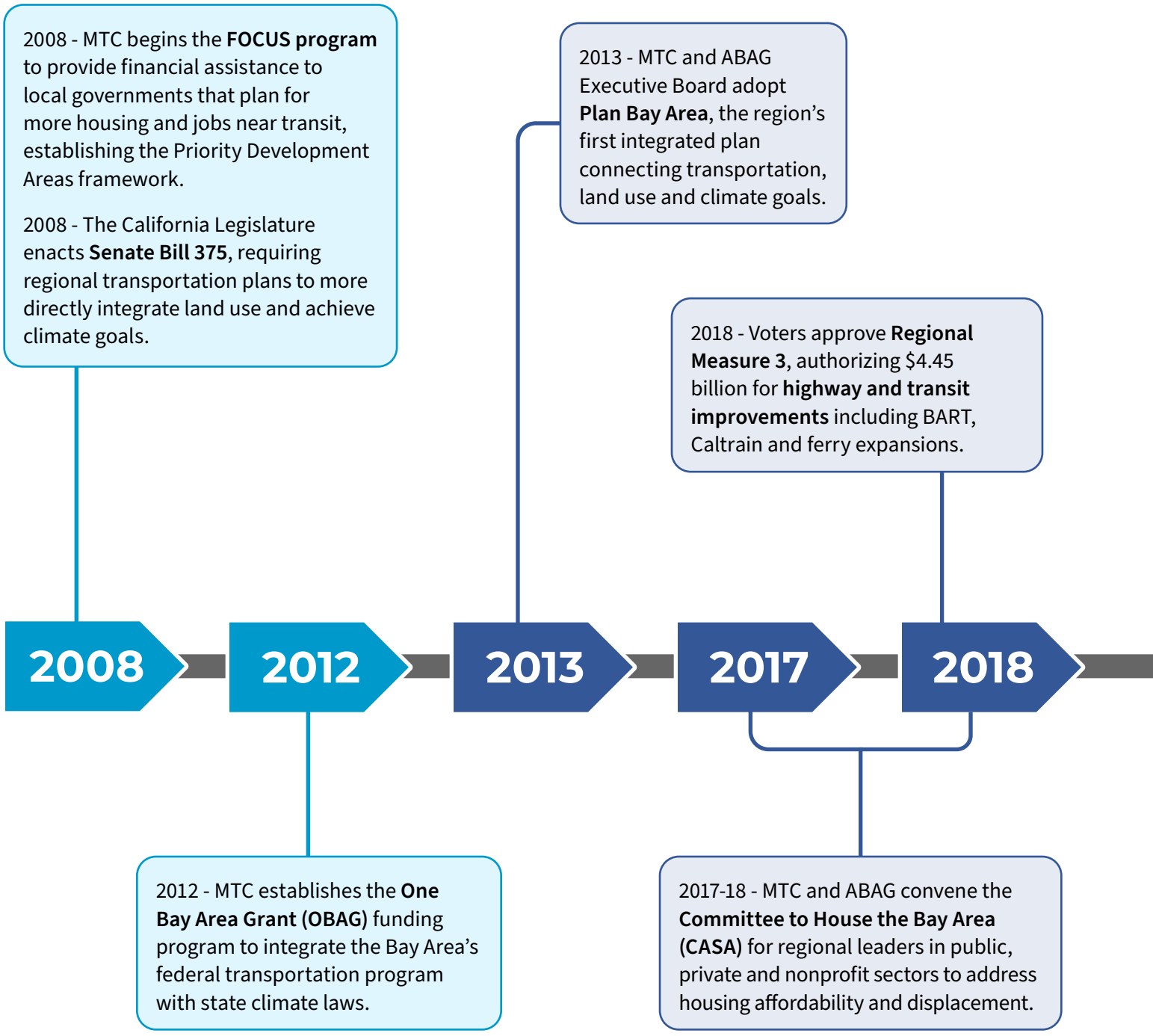
Since 1961 and 1970, respectively, ABAG and MTC have worked to improve quality of life for residents across the Bay Area's nine counties and 101 cities and towns.

In 2026, the Bay Area faces historic financial and political challenges that jeopardize the region's wellbeing and pose risks to its future, but the Bay Area has come together many times in the past to respond to change. As we look to 2050 and beyond, we can reflect on regional successes of the recent years to better understand what worked, how we can improve and how best to support residents.

Milestones in Regional Collaboration Since 2008

Investing in Programs for Focused Growth

Expanding Reach for Integrated Planning



Milestones in Regional Collaboration Since 2008 (continued)

Expanding Reach for Integrated Planning

Navigating the COVID-19 Pandemic and Recovery Efforts

2019 - The California Legislature establishes the **Bay Area Housing Finance Authority (BAHFA)**, giving ABAG and MTC tools to address the housing affordability crisis.

2019 - State establishes **Regional Early Action Planning Grants** (**REAP 1.0**, $23.9 million to ABAG), followed by **REAP 2.0** in 2021 ($97 million to MTC), to fund activities directly related to increasing housing production.

2020 - MTC assembles the **Blue Ribbon Transit Recovery Task Force** to work on transit pandemic recovery.

2021 - **MTC distributes over $2 billion in federal COVID relief** money to Bay Area transit agencies.

2022-23 - MTC expands initiatives to guide regional transit policies, including establishing the **Regional Network Management Council** to provide leadership and the **Regional Mapping and Wayfinding program** to coordinate signage.

2019

2020

2021

2022

2023

2020

2020 - ABAG launches the **Regional Housing Technical Assistance** program to help local governments comply with state laws and implement their Housing Elements.

2020 - MTC launches the **Clipper START** pilot, offering transit discounts for riders with low incomes across several transit agencies.

2023 - BAHFA, in partnership with MTC and ABAG, launches the **Doorway Housing Portal**, an online search and application portal for affordable housing units in the nine Bay Area counties.

Photo: Karl Nielsen

From Planning to Reality: Looking Back at Progress in Regional Investments

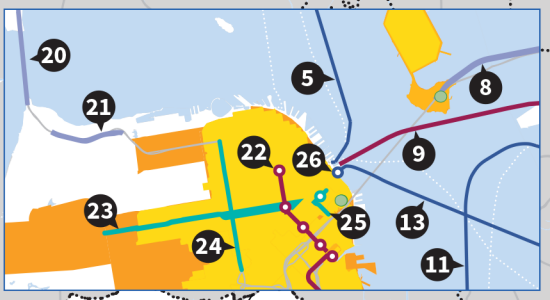
In the last two decades, regional investments have significantly improved connectivity across the Bay Area's transportation network, while also creating more housing opportunities and protecting open spaces. The Progress in Regional Investments Map shows where improvements, growth and conservation have occurred from 2010 to 2025.

Impactful capital projects (long-term investments in physical infrastructure) have transformed the Bay Area's passenger rail lines, bus and ferry routes, freeways, tunnels, and bridges. Alongside these transportation investments, land use investments have assisted Priority Development Areas (PDAs), which are places near public transit designated to accommodate new homes, jobs and community amenities. From 2010 to 2020, 58% of new Bay Area homes were built in PDAs. This concentration of housing growth has increased over time, with 66% of new homes built in PDAs between 2018 and 2023.

Along with assisting new development, MTC, ABAG and other regional partners have protected and improved the Bay Area's open space, farmlands, recreation areas and natural habitats as Priority Conservation Areas. Coordination across transportation, land use and the environment will be essential to reaching regional sustainability and mobility goals through 2050 and beyond.

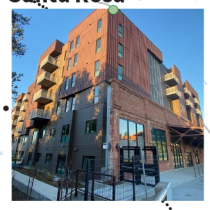
MAP 1-1

2010-2025: Looking Back at Progress in Regional Investments



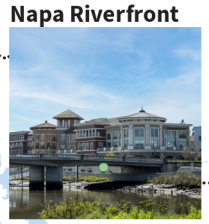
San Francisco Inset

Downtown Santa Rosa



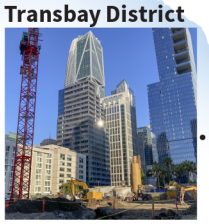
I-80 Express Lanes

Napa Riverfront

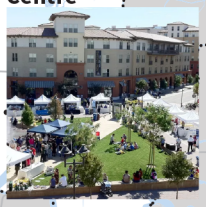


SMART

Transbay District



Contra Costa Centre



East Bay BRT

Caltrain Electrification

BART to Silicon Valley Phase I

Sonoma
Santa Rosa
Petaluma
Novato
San Rafael
Napa
Vacaville
Fairfield
Vallejo
Pittsburg
Antioch
Brentwood
Concord
Walnut Creek
Richmond
Berkeley
Alameda
San Leandro
Daly City
Dublin
Pleasanton
Livermore
Union City
Hayward
San Mateo
Redwood City
Mountain View
Palo Alto
Sunnyvale
Santa Clara
Cupertino

SONOMA
NAPA
SOLANO
MARIN
CONTRA COSTA
ALAMEDA
SAN MATEO
SANTA CLARA
SANTA CRUZ

TRANSPORTATION PROJECTS

- Highway
- Highway (existing)
- Bus Rapid Transit
- Express Lane
- Ferry
- Rail
- Rail (existing)
- Rail Station
- Ferry Terminal
- Bus Station

ENVIRONMENTAL PROJECTS

- Priority Conservation Area Grant

PRIORITY DEVELOPMENT AREAS

- Plan Bay Area (2013)
- Plan Bay Area 2040 (2017)
- Plan Bay Area 2050 (2021)

Source: TomTom North America (2019); mtc_transportation_project_lines_v4_2025
Map Author: PB, 01/26

Previously designated areas no longer within Priority Development Area boundary not shown.

Notable Transportation and Land Use Projects

I-80 Express Lanes
The I-80 Express Lanes between Vacaville and Fairfield, launched in late 2025, feature two 18-mile lanes in central Solano County.

BART to Silicon Valley Phase I
BART to Silicon Valley Phase I opened in 2020, adding two new stations and extending service 10 miles from Warm Springs/South Fremont to Milpitas and Berryessa/North San José.

Caltrain Electrification
Caltrain Electrification began service in 2024, converting the corridor between San Francisco and San José to electric rail operations.

Contra Costa Centre
Contra Costa Centre serves as a new public gathering space surrounded by homes, local shops and a connection to the Iron Horse Trail.

Downtown Santa Rosa
New homes, workplaces and safe street connections to SMART rail have solidified Downtown Santa Rosa's role as a key regional center.

East Bay BRT
East Bay BRT, branded as Tempo, launched in 2020 as a 9.5-mile bus rapid transit corridor between downtown Oakland and the San Leandro BART station.

Napa Riverfront
A major flood mitigation project created the opportunity to expand public access to the Napa River and create vibrant mixed-use riverfront development.

SMART
SMART launched in 2017 as a 48-mile commuter rail and pathway system connecting 14 stations between Larkspur and Windsor in the North Bay.

Transbay District
San Francisco's Transbay District serves as a hub for the Bay Area's transit network, a neighborhood with housing at all levels of affordability and a center for more than 25,000 downtown workers.

Key for Notable Transportation Projects

1. **SMART to Windsor**
2. **Marin-Sonoma Narrows**
3. **SMART Initial Operating Segment**
4. **SMART to Larkspur**
5. **SF Bay Ferry to Richmond**
6. **eBART to Antioch**
7. **Caldecott Tunnel Fourth Bore**
8. **Bay Bridge East Span Replacement**
9. **BART Transbay Tube Seismic Retrofit**
10. **Express Lanes**
    - I-80 Express Lanes
    - I-680 Express Lanes
    - I-580 Express Lanes
    - I-880 Express Lanes
    - U.S. 101 Express Lanes
    - SR-85 Express Lanes
    - SR-237 Express Lanes
11. **South San Francisco Ferry Service**
12. **AC Transit Tempo BRT**
13. **SF Bay Ferry to Alameda Seaplane Lagoon**
14. **BART Oakland Airport Connector**
15. **Devil's Slide Tunnel**
16. **Caltrain Electrification**
17. **BART Silicon Valley Phase 1 (to Warm Springs)**
18. **BART Silicon Valley Phase 1 (to Berryessa)**
19. **VTA Alum Rock BRT**
20. **Golden Gate Bridge-Suicide Deterrent Safety Barrier**
21. **Presidio Parkway (Doyle Drive Replacement)**
22. **SFMTA Central Subway**
23. **SFMTA Geary BRT**
24. **SFMTA Van Ness BRT**
25. **Salesforce Transit Center**
26. **SF Bay Ferry-Downtown San Francisco Terminal**

2 | Using the Plan

Photos (L to R): Top - Karl Nielsen

Photos (L to R): Bottom - Ben Botkin, Joey Kotfica

Photo: Joey Kotfica

Defining and Leveraging the Components

What Is This Document, and How Is It Used?

Plan Bay Area 2050+ is a joint project of the Metropolitan Transportation Commission (MTC) and the Association of Bay Area Governments (ABAG), regional government agencies that work with Bay Area cities and counties to plan for a more equitable, sustainable and prosperous region. This plan is a long-range regional vision for the Bay Area that seeks to address deep, longstanding — but solvable — issues that affect all Bay Area communities, from big cities to rural towns.

This plan is a limited and focused update of Plan Bay Area 2050, MTC and ABAG's 30-year vision for the Bay Area, that was adopted in 2021. Thirty-five strategies, made up of policies and investments, comprise the heart of the plan to improve transportation, housing, the economy and the environment across the Bay Area's nine counties (Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, Santa Clara, Solano and Sonoma).

As both as an ambitious vision and a practical resource for local partners, Plan Bay Area 2050+ asks what political and financial commitments would be required to make progress on long-range goals. At the same time, it offers tools that cities, counties, state agencies and other partners can use to align their local efforts with regional priorities, including predictions, maps and data tools.

Photo: Karl Nielsen

Definitions

Partners: A partner in the plan context may include local jurisdictions; public agencies at the city, county or regional levels; the federal and state government; non-profit and civic organizations; the business community; and labor, among many others.

Capital Costs: Long-term investment in physical infrastructure.

Operating Costs: Recurring investment to keep existing infrastructure in working order.

Needs: For the Transportation Element, due to regulatory requirements, needs refer to the cost of operating and maintaining the existing transportation system (Strategy T1 only). For the Housing, Economy and Environment Elements, however, needs refer to the total combined cost of enacting all strategies within that element.

Revenues: The money from all sources that, combined, would fund all strategies. In transportation, again due to regulatory requirements, revenues refer to an inventory of existing funding, as well as funding reasonably expected to be available through 2050. For the Housing and Environment Elements, the plan inventories existing revenues and relies on new revenues (from any future regional, state, federal or other sources) to make up the difference between estimated strategy costs and existing revenues. Economy revenues have not been inventoried for this plan due to MTC and ABAG's lack of authority, financial resources and technical capacity. Chapter 3 discusses the forecasted needs and revenues for each element.

What Does This Plan Achieve?

This plan serves as the Bay Area's Regional Transportation Plan and Sustainable Communities Strategy and meets certain state and federal requirements, while also going beyond them to address local priorities.

Topic Area	State/Federal Requirements[1]	How Plan Bay Area 2050+ Meets and Exceeds Requirements
Regional Coordination and Timing	Update every four years. Must coordinate long-range transportation, housing and land use for the region.	Integrates four elements (transportation, housing, the economy and environment) into a cohesive plan, held together with the vision "to ensure that by the year 2050 the Bay Area is more affordable, connected, diverse, healthy and vibrant for all."
Community Engagement	Robust, collaborative community engagement process.	Engages residents of all nine counties on all four elements, in multiple languages, through in-person events, online discussions, surveys and more, with a focus on Equity Priority Communities.
Transportation	Produce fiscally constrained Transportation Project List. Identify transportation network to service regional needs.	Develops extensive transportation strategies for all modes of transportation and engages in more robust transit network planning via Transit 2050+.
Housing	Accommodate future growth at all income levels.	Designs comprehensive housing strategies that address the production, preservation and protection of the region's affordable housing stock; quantifies fiscal needs; and identifies future revenues.
Environment	Meet per capita greenhouse gas reduction target. Achieve air quality goals under the Clean Air Act.	Identifies a wide range of environmental strategies from natural hazards and open space to clean air and climate emissions; generates a Resilience Project List; quantifies fiscal needs; and identifies future revenues.

This plan contains practical resources that local agencies can use, and it also explores the broader question, "What would it take to achieve key regional goals?" Financial and political support are particularly important dimensions of this big-picture question in a long-range plan. On the practical side, city, county and state agency partners can align their local plans with regional priorities using the plan's Growth Geographies and growth pattern via maps, data layers and other data tools.

Importantly, Plan Bay Area 2050+ does not supersede local land use authority. Bay Area cities and counties retain control over their land use decisions, such as zoning, general planning and development projects. This document is also a long-range planning document and not a near-term financial programming document. The plan does not represent a commitment of funding by any level of government for any particular strategy or project.

1. For California Regional Transportation Plan requirements, see Cal. Gov't Code § 65080. (n.d.). https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=GOV&sectionNum=65080. For California Air Resources Board (CARB) Sustainable Communities Strategy requirements, see the California Air Resources Board. (2026). SB 375 regional targets. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-375-regional-targets. For full federal requirements, see federal statute 23 U.S.C. § 134. (n.d.). Metropolitan transportation planning. https://uscode.house.gov/view.xhtml?req=granuleid:USC-prelim-title23-section134&num=0&edition=prelim.

Vision and Guiding Principles

Plan Bay Area 2050+ envisions a Bay Area that is more affordable, connected, diverse, healthy and vibrant for all residents through 2050 and beyond. These five principles were created through an extensive community engagement process conducted in 2018 at the start of Plan Bay Area 2050, and they continue to serve as a guiding structure for the updated plan.

Plan Bay Area 2050+ Five Guiding Principles

AFFORDABLE

All Bay Area residents and workers have sufficient access to housing options they can afford — households are economically secure.

CONNECTED

An expanded, well-functioning, safe and multimodal transportation system connects the Bay Area — fast, frequent and efficient intercity trips are complemented by a suite of local transportation options, connecting communities and creating a cohesive region.

DIVERSE

The Bay Area is an inclusive region where people from all backgrounds, abilities and ages can remain in place with access to the region's assets and resources.

HEALTHY

The region's natural resources, open space, clean water and clean air are conserved — the region actively reduces its environmental footprint and protects residents from environmental impacts.

VIBRANT

The Bay Area is an innovation leader, creating job opportunities for all and ample fiscal resources for communities.

Photo: Josh Edelson

Elements, Themes and Strategies

Plan Bay Area 2050+ is organized into four interrelated **elements**: transportation, housing, economy and environment. The elements are further built out by 11 **themes**, under which **strategies** are nested. The themes aim to clarify MTC and ABAG's priorities within each element and guide strategies to the outcomes most important to Bay Area communities.

This plan updates Plan Bay Area 2050's 35 strategies to better meet the current moment with refreshed data and assumptions about post-pandemic societal trends. Most strategies have been modified, some are new, and just a handful remain the same since 2021. Changes that respond to engagement feedback and reflect progress since the last long-range plan are noted alongside the new strategy descriptions in Chapter 4.

Strategy Definition

A plan strategy is a public policy or set of investments that can be implemented in the Bay Area by 2050. A strategy is not a near-term action, a mandate for a jurisdiction or agency, or a legislative proposal. Strategies can be advanced at the city, county, regional or state level.

Elements and Themes

TRANSPORTATION THEMES

- Maintain and Optimize the Existing System
- Create Healthy and Safe Streets
- Build a Next-Generation Transit Network

HOUSING THEMES

- Protect and Preserve Affordable Housing
- Spur Housing Production for Residents of All Income Levels
- Create Inclusive Communities

ECONOMY THEMES

- Improve Economic Mobility
- Shift the Location of Jobs

ENVIRONMENT THEMES

- Reduce Risks from Hazards
- Expand Access to Parks and Open Space
- Reduce Climate Emissions

The elements, themes and strategies are interrelated, working together to improve transportation options, housing affordability, and economic access while protecting the Bay Area's natural resources. Transportation and housing strategies aim to first protect residents' current housing options and travel connections and to expand them responsibly, aligned with identified growth areas. Housing and environment strategies protect areas outside urban growth boundaries and at high risk of climate impacts from new development while supporting new urban parks. Economic strategies guide job growth toward places near transit, while housing strategies encourage affordable developments near existing and future job centers, allowing more people to better access both transit and jobs throughout the region.

Project Lists: Transportation and Sea Level Rise Resilience

Nested under the plan's Transportation Element strategies and select Environment Element strategies are the Transportation Project List and Sea Level Rise Resilience Project List. These project lists both support Plan Bay Area 2050+ goals, but they have key distinctions. As a federally mandated, long-range regional transportation plan, Plan Bay Area 2050+ is required to contain a fiscally constrained Transportation Project List. Any major transportation project hoping to advance to construction in the Bay Area must be included first in the Transportation Project List to receive funding.

In addition to the Transportation Project List, the Sea Level Rise Resilience Project List is a new plan component and a proactive step toward regional climate adaptation efforts. Developed in partnership with the San Francisco Bay Conservation and Development Commission, the Resilience Project List is fiscally unconstrained and can serve as a future advocacy resource.

Photo: Karl Nielsen

Implementation Plan and Actions

Plan Bay Area 2050+ includes an **Implementation Plan** that outlines the steps to realize plan strategies. **Implementation actions** are core components of the Implementation Plan and include concrete steps that can be taken to advance each strategy through 2030. Implementation requires partnership between various levels of government and the private and non-profit sectors across the region. The Implementation Plan includes suggestions for where MTC and ABAG can lead and where they can better serve in a partner or support role. See more Implementation Plan information in Chapter 6 and the Implementation Plan Report.

Engaging the Community, Incorporating Feedback – Public Engagement Highlights

While Plan Bay Area 2050+ is a limited and focused update, MTC and ABAG conducted robust and extensive community engagement activities to guide it. Pop-up workshops at festivals, farmers markets, stores, colleges and other community gathering spaces in all nine Bay Area counties allowed MTC and ABAG staff to present information, take structured input and welcome impromptu conversations with residents about the plan's four elements. Multilingual online surveys, webinars, and in-person meetings and workshops also allowed residents and many technical partners, from local governments to federal land management agencies, to provide input and express their concerns about the plan. The Public Engagement Report provides more details on these engagement opportunities and the many stakeholders who attended events, wrote letters and gave thoughtful feedback through conversation.

Types of Engagement for Plan Bay Area 2050+

- "Pop-up" workshops across the nine Bay Area counties
- Online surveys
- Partnerships with community-based organizations
- Webinars
- In-person workshops for technical partners
- Public hearings

1.4 million Bay Area residents reached through digital promotion and electronic communications

17,600+
Participants Overall

5,000+
Survey Responses

300 Participants
In four technical workshops

1,300
Comments
Collected as part of 41 pop-up events

16,000+
Additional comments
Collected through an online survey

500+
Participants
In online webinars

22 Community-based Organizations
Partnerships with community-based organizations that serve historically excluded groups, including residents with low incomes, Tribal communities and non-English speakers

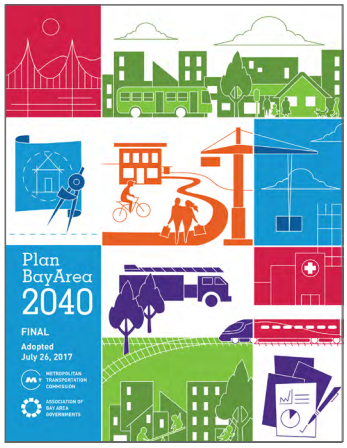
Plan Evolution: What's Changed?

Plan Bay Area Over Time

Plan Bay Area 2050+ is the fourth iteration of the Bay Area's integrated regional plan since the adoption of Senate Bill 375 in 2008, which linked land use, transportation and housing planning to state climate goals. It mandated regional targets for greenhouse gas emission reductions, which Metropolitan Planning Organizations (like MTC) must meet through Sustainable Communities Strategies (like Plan Bay Area).

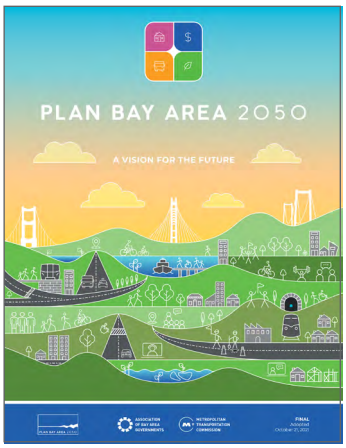
Plan Bay Area, adopted 2013

- Brought MTC and ABAG together in a shared vision for the nine-county Bay Area.
- Included shared regional performance targets and newly introduced programs — such as Priority Development Areas and Priority Conservation Areas — that continue to support cities and counties to this day.



Plan Bay Area 2040, adopted 2017

- Opened with a call to action to address the regional housing crisis and identified the "3Ps of housing" framework: produce more new housing, preserve existing affordable housing and protect tenants from the unique pressures of the Bay Area housing market.



Plan Bay Area 2050, adopted 2021

- Evolved beyond federal and state requirements to include more strategic planning and comprehensive visioning.
- Pivoted from predicting the future to incorporating scenario planning and an exploration of how strategies fare within uncertain futures, resulting in the four elements and 35 strategies.
- In response to the COVID-19 pandemic and national calls for racial justice, met the moment with a focus on equity and resilience.

What's Changed From Plan Bay Area 2050?

As a limited and focused update to Plan Bay Area 2050, this plan leverages the vision and guiding principles from the previous plan and maintains its strategic framework. The updated plan focuses on three core priorities: updating assumptions about the trajectory of societal trends through 2050 (such as regional population and job growth), revising the Implementation Plan, and emphasizing public engagement.

This plan forecasts lower near-term revenues and slower population growth regionwide, reflecting bigger financial and political challenges following the pandemic and the 2020 economic recession. This plan has been refined to address persistent post-pandemic trends, including ongoing barriers to downtown recovery and steadfast work-from-home levels; high housing construction costs; transit ridership levels that have not returned to pre-pandemic rates; and growing resilience needs to address natural disasters. The Implementation Plan (Chapter 6) also has been revised to reflect progress made since 2021 and emerging priorities through 2030.

Photo: Flor Haus

Transit 2050+

Transit 2050+ represents one of the most significant changes between this plan and the previous one. As a parallel long-range planning process, Transit 2050+ was a collaboration between MTC and Bay Area transit agencies to re-envision the future of the region's public transit network. The impetus for Transit 2050+ was the 2021 Bay Area Transit Transformation Action Plan, borne out of the regional Blue Ribbon Transit Recovery Task Force, which was convened in 2020 to spur transit recovery during the COVID-19 pandemic.[2] The 2021 Transit Transformation Action Plan emphasized near-term actions to transform the Bay Area transit rider experience, focusing on fares, payments, accessibility and customer information.

While Plan Bay Area 2050 envisioned a robust, connected transit network, current financial and political conditions necessitated a comprehensive transit strategy overhaul. Pandemic-induced commute pattern changes, loss of anticipated fare revenues and adjustments to a potential multi-county transportation measure all contributed to strategy revisions. MTC worked with a transit agency-led project management team composed of planners and other staff from 12 of the Bay Area's large and small transit agencies. The team developed a data-driven approach that incorporated local feedback from across the region, exploring needs and gaps, evaluating projects, and shaping refined strategies to regrow transit ridership.

Ultimately, Transit 2050+ championed a service-based, fiscally responsible transit network, with projects that would improve existing services; enhance the passenger experience; and incorporate new bus, rail and ferry capital projects. The process resulted in five revamped, transit-oriented strategies in the Transportation Element that support the final network vision. For more information on specific strategy changes and early implementation actions, see Chapter 4 and the Transit 2050+ Report, respectively.

2. MTC (2021, September). Bay Area Transit Transformation Action Plan. https://mtc.ca.gov/TransitActionPlan

3 | Understanding the Context

Photos (L to R): Top - Karl Nielsen, Joey Kotfica

Photos (L to R): Bottom - Noah Berger, Karl Nielsen

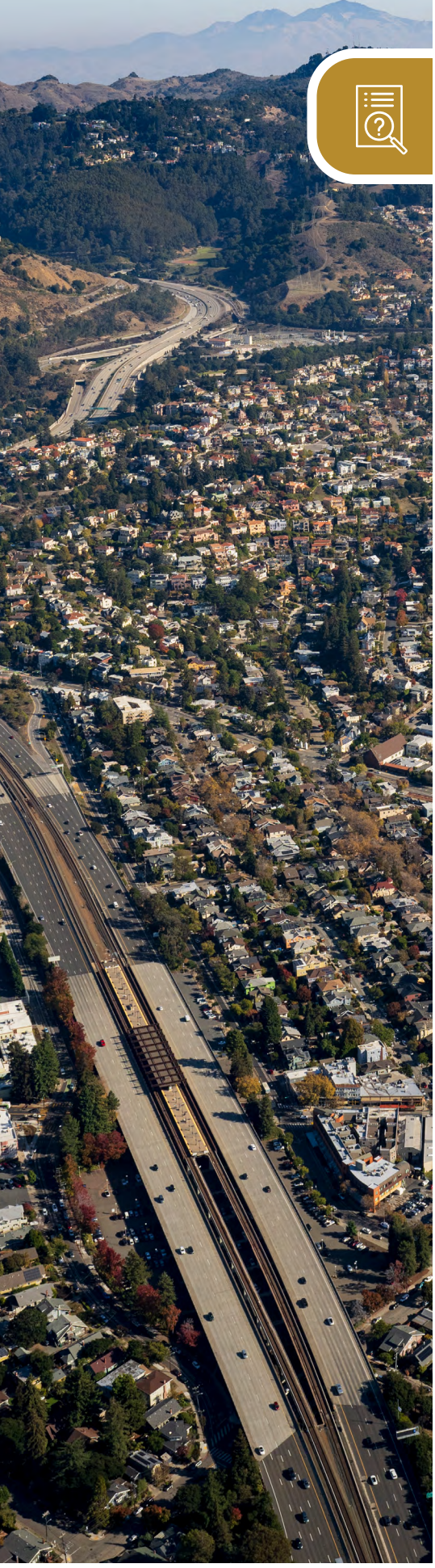


Photo: Karl Nielsen

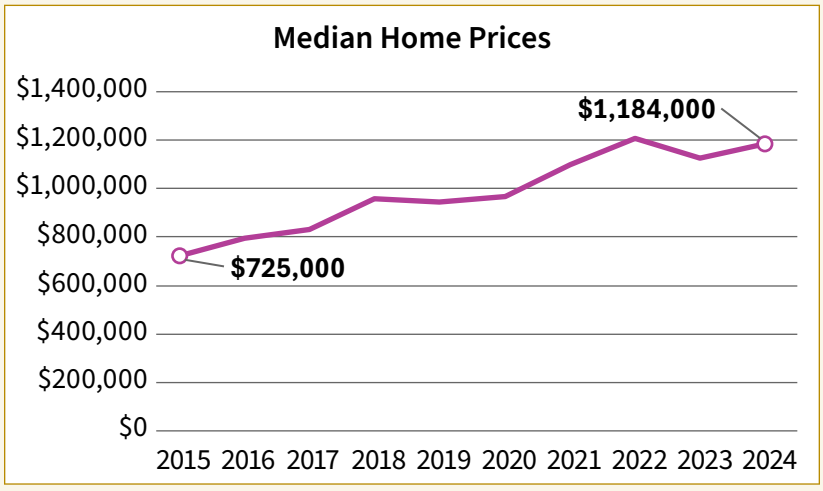
Trends, Assumptions, Needs and Revenues

Where Is the Bay Area Now?

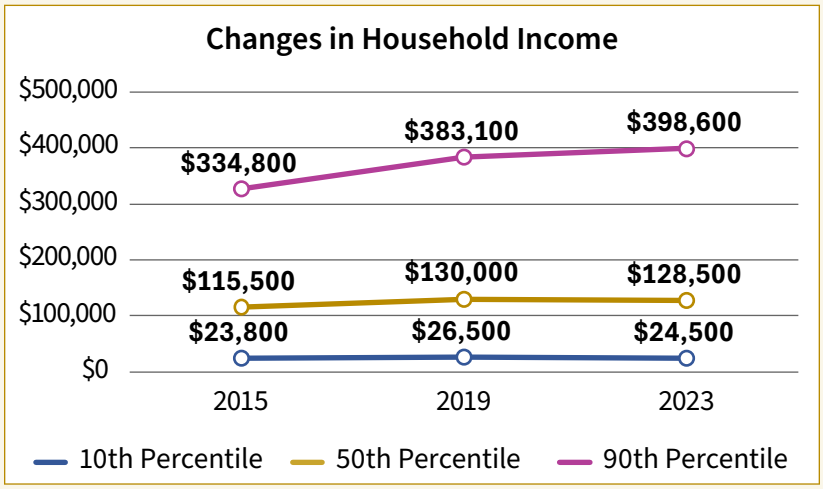
As explored in Chapter 1, the early 2020s marked a historic shift in the way people in the Bay Area and across the world live, travel, work and relate to one another. Looking back from the mid-2020s, a number of pandemic-related patterns affect the Bay Area's ability to ensure that its residents can live in a fully affordable, connected, diverse, healthy and vibrant region. These trends inform the data used as the foundation of this plan, helping to anchor the strategies to the real world and to residents' priorities.

In 2025, the people of the Bay Area face rising costs, persistent housing shortages and widening inequality, making it difficult for many residents — especially low- and moderate-income households — to find stable housing or achieve homeownership. Transit ridership remains lower than before the pandemic, while freeway traffic has rebounded. Income and racial disparities persist, homelessness is growing, and both the wealthiest and poorest residents reside in urban centers in close proximity but lead starkly separate lives. The population is aging rapidly, commercial vacancies remain high and job growth is uncertain following losses in early 2025. Environmental risks, from wildfires to sea level rise, compound these challenges, while unequal access to parks and the ongoing effects of climate change threaten long-term regional health.

Figure 3-1. Snapshot of Trends Since 2015



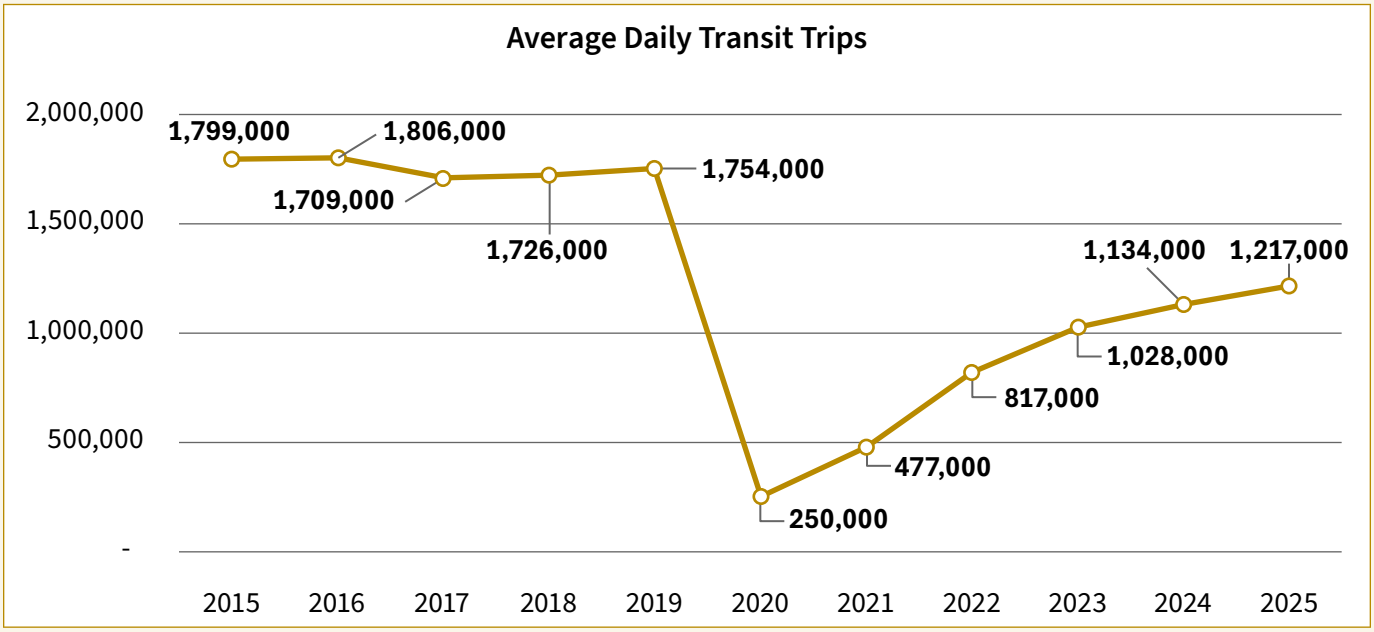
Bay Area median home prices have risen steadily over the past 10 years, from about $725,000 in 2015 to nearly $1.2 million in 2024.[1]



Median household incomes in the Bay Area reflect growing inequality, with the 50th percentile holding fairly steady while the 90th percentile's incomes grew by $64,000, and the 10th percentile lost roughly $1,000, from 2015-2023.[2]

1. Zillow. (2024). Zillow Home Value Index (ZHVI) 2000-2024. https://www.zillow.com/research/data/
2. U.S. Census Bureau. (2025). Contemporatenous income estimates adjusted to constant 2023 dollars using the Consumer Price Index for All Urban Consumers: All Items (CPIAUCSL). American Community Survey 1-Year Estimates, Public Use Microdata Sample.

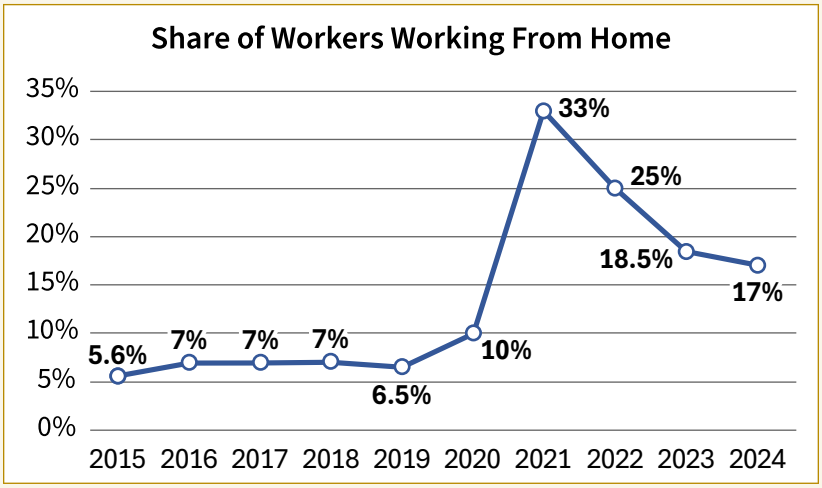
Figure 3-1. Snapshot of Trends Since 2015 (continued)



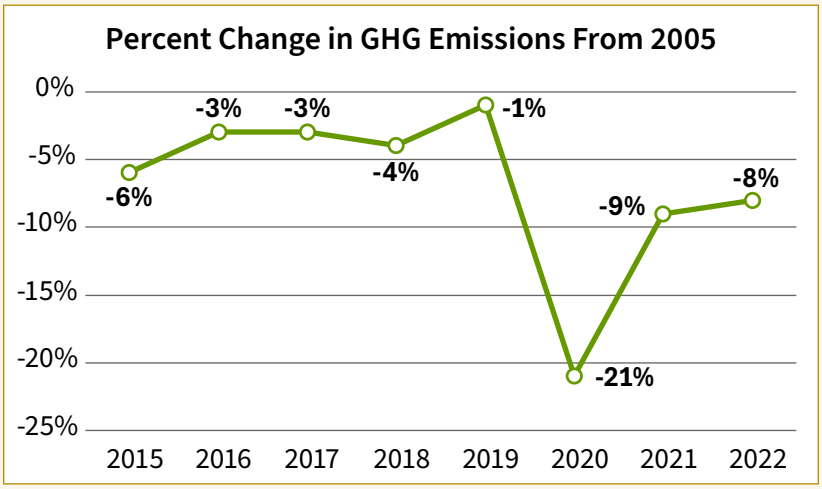
Average daily transit trips in the Bay Area held fairly steady from 2015 to 2020, between 1.7 million and 2 million. The number plummeted to just 250,000 in 2020 as many more people worked from home, returning to approximately 1.2 million by 2025.[3]

3. MTC and ABAG. (February 2026). San Francisco Bay Area - National Transit Database: Demand: Average Daily Table 2015-2025. (Figures in this chart represent average daily trips in the month of April for a given year.) https://public.tableau.com/app/profile/bayareametro/viz/SanFranciscoBayArea-NationalTransitDatabase/Navigation

Figure 3-1. Snapshot of Trends Since 2015 (continued)



Work-from-home rates in the Bay Area remained fairly steady from 2015-2019, before rising sharply in 2020 during the pandemic. In 2024, **about 17% of Bay Area workers were primarily working from home in a given week.**[4]



GHG emissions dropped nearly 20% during the pandemic before returning to a level just under pre-pandemic.[5]

4. U.S. Census Bureau. (2025). Table B08301 Means of Transportation to Work. 2024 American Community Survey 1-Year Estimates. Work from home definition refers to "worked at home as primary 'mode' in the reference week." This figure includes workers 16 years and over, filtered to Bay Area counties who worked in the reference week.
5. California Air Resources Board. (October 2024). SB 150 Dashboard, GHG and VMT Compared to SB 375 Targets. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/sb-150-dashboard-tracking-progress-sustainable

Photo: Karl Nielsen

Understanding Assumptions: What Might Happen in the Future?

Current societal trends are used as context to assess how well policies and investments may meet both current and future residents' needs. This plan includes a variety of planning assumptions about the trajectory of societal trends. While Chapter 1 gives a big-picture snapshot to set the scene of the region in 2025, this chapter delves into the specific assumptions used as inputs to build the plan strategies.

Rather than firm predictions of the future, these inputs seek to turn societal trends into usable, current data to help us understand where the Bay Area is now and where it could and should be heading. This analysis of trends is a foundation for MTC and ABAG's planning work, and the inputs remain constant for each scenario analysis of a future Bay Area explored throughout the plan, including a future where no plan strategies are implemented (explored more in Chapter 5: Improving Outcomes). Updating these assumptions is one of three core priorities for the plan, along with revising the Implementation Plan and emphasizing public engagement.

Definitions

Plan Bay Area 2050+ **Assumptions** include predictions about external forces; projections of regional growth patterns (such as population, household and job growth); and forecasts of funding needs and revenues.

External forces include estimates about future conditions beyond the Bay Area's control, such as work-from-home rates or sea level rise predictions.

The **Regional Growth Forecast** represents MTC and ABAG's estimate of population, household and job growth across the Bay Area through 2050.[6]

6. For further discussion of the Regional Growth Forecast, its planning requirements, relationship to the Regional Housing Needs Allocation (RHNA), differences with California Department of Finance projections and obligations under a 2014 legal settlement with the Building Industry Association, please see https://planbayarea.org/draftplan.

External Forces: Factors Beyond Government Control

Since the adoption of Plan Bay Area 2050 in 2021, pandemic-induced work patterns, technological advancements and climate change have all transformed the region. Without knowing how other future forces may impact the plan's policies and investments, Plan Bay Area 2050+ leverages the previous plan's analysis of **external forces** and makes targeted updates based on evolving trends of the last five years.

Work From Home

The COVID-19 pandemic ushered in a new trend of remote work for office workers. Plan Bay Area 2050 assumed work-from-home rates would be temporary and, without implemented strategies, would reach 12% in 2050.

By 2023, 27% of the Bay Area's workforce worked from home, signaling that the trend has lasted longer than expected. **Plan Bay Area 2050+ predicts that 25% of all workers could be working from home on a typical workday by 2050.**[7]

If this prediction becomes a reality, the Bay Area could continue to face slow economic recovery in downtowns and commercial corridors, as well as more limited growth in weekday transit ridership.

Space per Worker in Office Buildings

As of 2025, many downtowns continue to experience commercial vacancy rates at the highest level seen in decades. **Plan Bay Area 2050+ predicts that average space per worker could decrease by 15% in 2050, as a result of assumed work-from-home levels.**

If this prediction becomes a reality, office spaces may be more efficiently used compared to pre-pandemic trends, and fewer new office buildings may be built relative to anticipated job growth.

Autonomous Vehicles

As a center of the technology industry, the Bay Area has a higher share of autonomous vehicles (AVs) on the road compared to other regions in the country. **Plan Bay Area 2050 predicted that the region could see AVs grow to 20% of the regional passenger vehicle fleet by 2050. Plan Bay Area 2050+ maintains this prediction**, suggesting continued improvements in AV technology, greater comfort among the general population and more AV availability beyond initial testing areas.

Sea Level Rise

Climate change has resulted in rising sea levels in the Bay Area. This ongoing trend could cause disastrous damage to buildings, infrastructure and habitats across the region. Plan Bay Area 2050 planned for two feet of permanent inundation by 2050.

Plan Bay Area 2050+ also assumes 2 feet of permanent sea level rise by 2050 and includes an adaptation strategy that protects against annual king tide events and major storms up to 4.9 feet. For more background, see the Resilience Project List Report.

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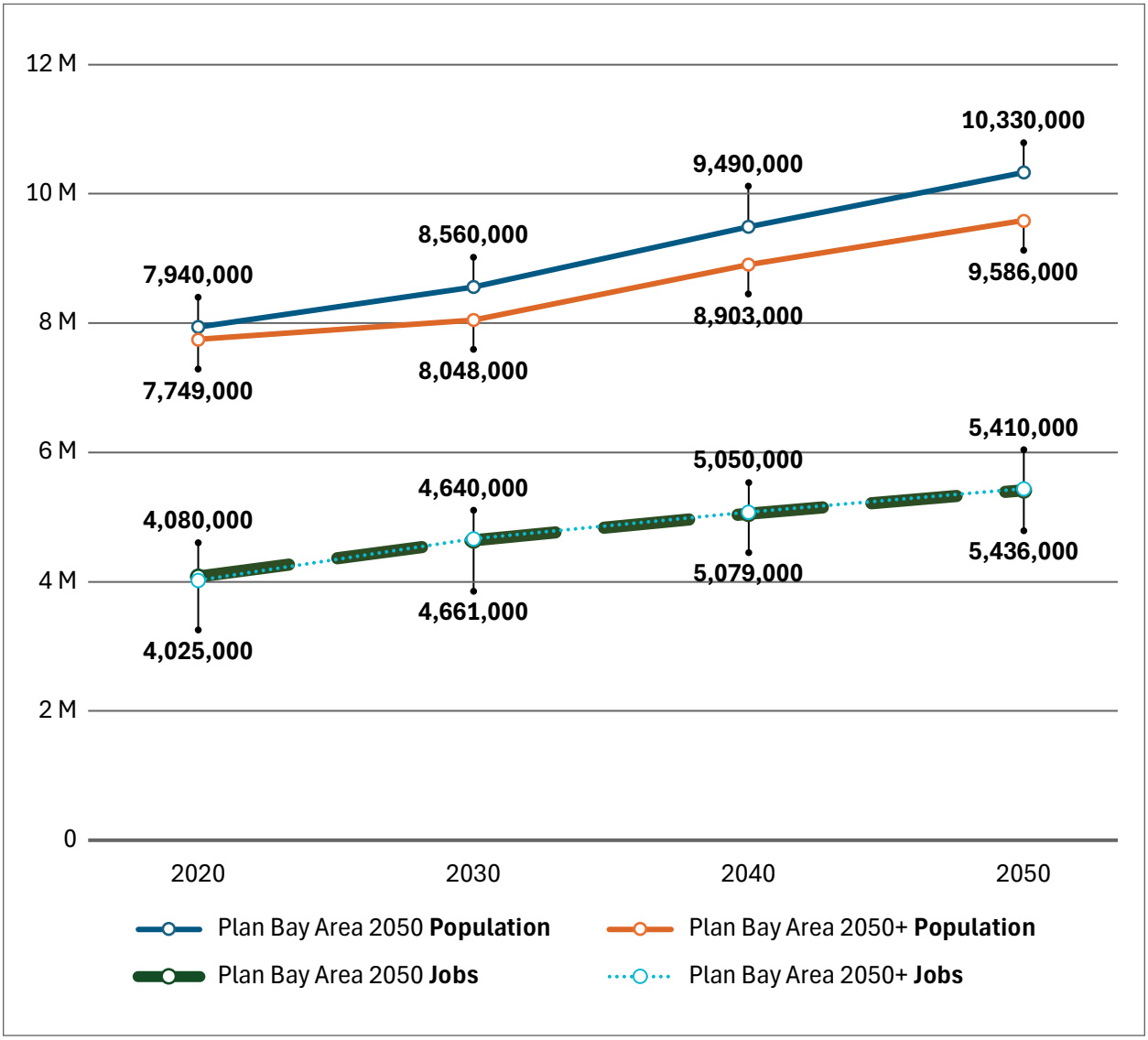
7. The work-from-home on a typical workday rate represents the daily pattern for an average weekday in the MTC-ABAG travel model (Tuesday through Thursday). It differs from the share of workers who work from home as their primary work mode, which reflects a weekly pattern. For example, a person who works from home for a few days per week will not be captured as having work from home as their primary work mode; however, their work-from-home activity is captured in the daily pattern.

Regional Growth Forecast

MTC and ABAG's **Regional Growth Forecast** is another key long-range planning input that estimates how much the Bay Area might grow between 2020 and 2050 across population, jobs and households.

For this estimate, the plan carries over the same methodological approach as Plan Bay Area 2050; however, the updated forecast accounts for key changes since the previous forecast was released. Notably, Plan Bay Area 2050+ uses more recent data, such as the 2020 Decennial Census, that reflect COVID-related impacts and reveal the region's 2020 baseline population to be nearly 200,000 persons lower than previously estimated.

Figure 3-2. Forecasted Population Between Plan Bay Area 2050 and Plan Bay Area 2050+



Looking ahead, Plan Bay Area 2050+ predicts that the Bay Area could grow and change in a number of ways by 2050, informed by the trends above. For more information on the Regional Growth Forecast, please see the Forecasting and Modeling Report.

Population

Plan Bay Area 2050+ plans for **9.6 million people and 3.8 million households** for the Bay Area in 2050. This represents a drop of 750,000 people and 250,000 households compared to Plan Bay Area 2050 forecasts.

This drop is driven by declines in fertility and immigration rates, as well as pandemic-related out-migration to other counties and states.

Household and Age

The Bay Area's population is predicted to experience a **decreasing birth rate** and a **declining average household size**. As a result, the **population could age faster** than new generations are born, while still driving strong demand for housing.

Baby Boomers (born between 1946 and 1964) and Millennials (born between 1981 and 1996) would make up the greatest shares of population.

Racial and Ethnic Diversity

The Bay Area's population is predicted to become more **diverse by race and ethnicity** by 2050. This projection is based on estimated rates of migration into the region and estimated new births.

Jobs

Plan Bay Area 2050+ anticipates there being **5.4 million jobs** in the Bay Area in 2050, similar to the forecast in Plan Bay Area 2050. This figure is influenced by a projected increase in "gig work," second jobs and non-traditional employment.

The Bay Area will remain economically competitive thanks to a skilled labor force, innovative industries, and unique natural and cultural amenities.

Income

The region's **middle class is predicted to shrink** through 2050. Under this trend, the shares of both low- and high-income earners are predicted to grow.

Industry Composition

The Bay Area is likely to continue to be a **center for innovation, technology and services**. Sectors expected to grow include professional and managerial, arts and recreation, and health and educational services.

Needs and Revenues: How Much Money Is Available, and Where Are the Gaps?

The big-picture, long-term strategies in this plan will require billions of dollars to enact. **Needs and revenues** are financial forecasts that support plan strategies. Federal law requires the Transportation Element to be fiscally constrained, meaning that investment levels proposed to operate, maintain and enhance the system must not exceed reasonably anticipated transportation revenues. Transportation needs are separated between needs to operate and maintain the existing system (consistent with MTC's "Fix It First" Policy) and funding for transportation enhancement, expansion and restoration. Projected revenues include federal, state, regional and local sources, as shown in Figure 3-3.

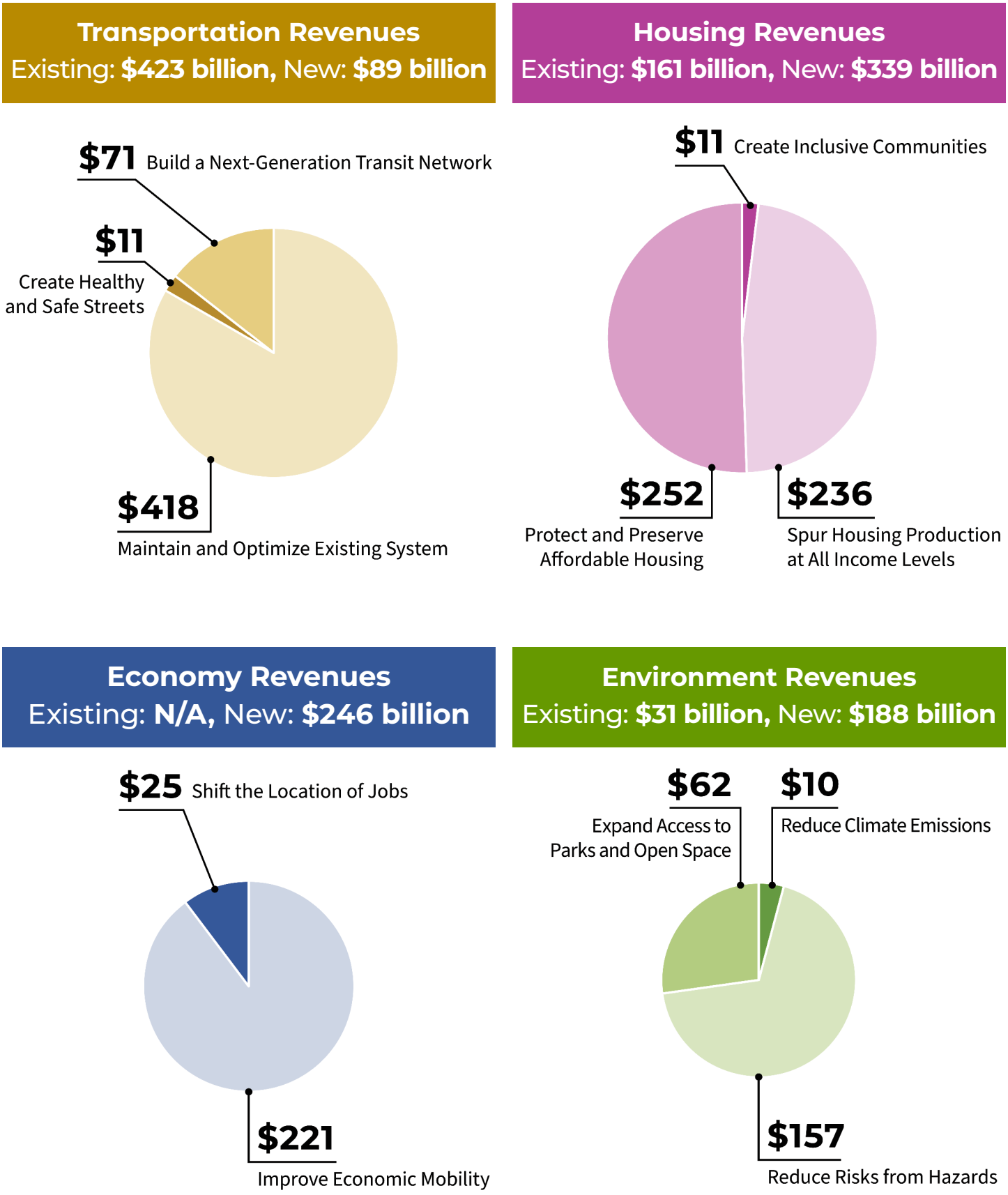
The plan's other elements — housing, economy and environment — are not subject to the same statutory requirements in terms of forecasting financial needs or available revenues. Unlike the Transportation Element, these forecasts estimate needs and revenues required to achieve regional goals. For these elements, needs and estimated strategy costs are synonymous. However, both the Housing and Environment Elements forecast existing revenues over the planning period as a best practice, as shown in Figure 3-3. Economic development revenues are not inventoried due to the agencies' lack of authority, financial resources and technical capacity. Figure 3-4 highlights existing and new revenues by element and shows how the needs in each element break down by theme.

Figure 3-3. Forecasted Revenue by Plan Element (in billions)

Revenue Source	Transportation	Housing	Environment
Federal	$50	$74	$9
State	$103	$35	$4
Regional	$54	—	—
Local	$199	$51	$18
New	$89	$339	$188
Secured	$17	—	—
Total	**$512**	**$499**	**$219**

NOTE: The Transportation Element includes new revenues, such as a potential regional revenue measure and strategy-based revenues, as well as anticipated revenues reasonably expected to be available over the plan horizon. For the Housing and Environment Elements, new revenues could reflect a mix of state, regional and local sources implemented in a phased manner over the coming decades.

Figure 3-4. Revenues and Investments (in billions)



NOTE: Existing economic development revenues not inventoried. $11 billion in transportation revenues are assigned to support select Environment Element strategies. Numbers may not sum due to rounding.

Transportation Needs and Revenues

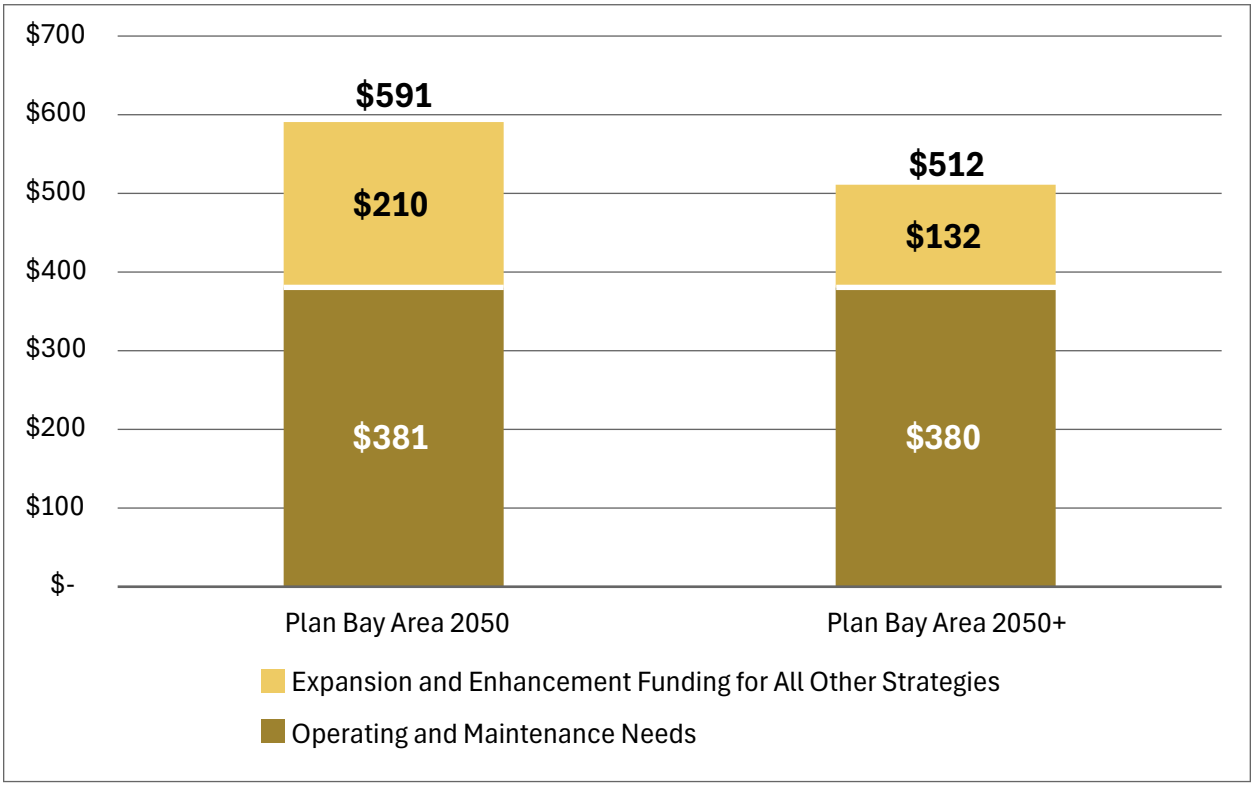
For the Transportation Element, the plan forecasts higher costs and lower revenues compared to Plan Bay Area 2050. At $380 billion, the costs to operate and preserve the existing transportation network through 2050 are roughly equivalent to those in Plan Bay Area 2050, despite a shorter timeline. Moving forward, rising capital costs — particularly for major expansion projects — will pose a significant funding challenge.

This plan projects the total revenue available to support the Transportation Element by 2050 to be $512 billion.[8] This forecasted revenue is nearly $80 billion less than the revenue projected in the prior plan. This shortfall is primarily driven by reductions in two key areas:

- $31 billion less in local sources, including transit fare revenues.
- $41 billion less in new and anticipated sources, including lower assumed revenues from Plan Bay Area 2050+ parking and road pricing strategies and a more narrowly scoped regional transportation funding measure.

Compared to Plan Bay Area 2050, the overall cost to operate and preserve the existing network decreased by only $1 billion, at $380 billion. After fully covering this cost, consistent with MTC's "Fix it First" Policy, the projected funding available to expand and enhance the region's transportation system is $132 billion, significantly lower than the $210 billion available in Plan Bay Area 2050.

Figure 3-5. Transportation Revenues, Needs and Expansion Funding ($ in billions)



8. The Transportation Element contains $11 billion in revenues that support select Environment Element strategies that reduce climate emissions.

Photo: Karl Nielsen

Housing Needs and Revenues

The housing forecast projects what it would take to financially support Plan Bay Area 2050+ Housing Element strategies. Since the previous plan, the projected cost to ensure that all Bay Area residents are secure in their housing has increased to $500 billion from $458 billion. Rising development costs (including construction costs and interest rates) and income inequality both play a role in this projection, as the need for low-income housing units is projected to increase. Although the plan forecasts an increase in housing revenue compared to the previous plan, needs dwarf existing revenues by $339 billion. Potential revenues to support the Housing Element could include any mix of federal, state, regional and local sources.

Photo: Karl Nielsen

Environment Needs and Revenues

The plan's Environment Element includes $229 billion in needs, more than doubling the $103 billion in needs included in Plan Bay Area 2050. The most significant increase is associated with updated cost estimates for mitigating sea level rise, informed by the Sea Level Rise Funding and Investment Framework effort co-led by the San Francisco Bay Conservation and Development Commission and MTC.

The revenues forecasted to support the Environment Element total $31 billion, representing a significant shortfall of $187 billion. Approximately $11 billion in transportation revenues support climate-related Environment Element strategies. Current revenues include the 2024 California State Climate Bond, among many other sources, while future revenues could include any mix of federal, state, regional and local sources.

Photo: Karl Nielsen

Strategies Toward a Brighter, More Equitable Future

The next chapter uses these trends, assumptions, needs and revenues to inform 35 strategies across the elements of transportation, housing, the economy and the environment. Long-term planning requires both practical realities and imaginative possibilities, and the strategies aim to balance an ambitious approach within a difficult political and financial moment.

4 | Developing the Plan

Photos (L to R): Top - Flor Haus, City of Vacaville

Photos (L to R): Bottom - Noah Berger, Karl Nielsen

Photo: Karl Nielsen

Strategies for the Bay Area

The building blocks for realizing Plan Bay Area 2050+'s vision of a more affordable, connected, diverse, healthy and vibrant Bay Area for all residents by 2050 are its 35 strategies. Together, the strategies could help the entire region to build more homes, reduce travel times, and create vibrant downtowns and natural areas for everyone to enjoy. The strategies also aim to keep people safe from natural hazards, support a strong economy and provide stable housing for those who need it most, all while improving how residents get around the Bay Area using public transit, roads and trails.

In Plan Bay Area 2050+, a **strategy** is a public policy or set of investments that can be implemented in the Bay Area by 2050. A strategy is not a near-term action, a mandate for a jurisdiction or agency, or a legislative proposal. Strategies can be advanced at the city, county, regional or state level.

This plan makes targeted refinements to Plan Bay Area 2050's strategies based on new data and insights into residents' experiences over the last four years. Strategies are organized by the plan's four elements (transportation, housing, economy and environment) and further grouped into 11 themes. Drawing on public engagement feedback, the themes create broad goals within each element and clarify the plan's objectives. Strategies within the themes then lay out how to make regional progress on these issues. This chapter outlines the 35 strategies and includes the estimated costs to implement each. Project lists, which detail more specific investments within the Transportation and Environment Elements, nest within multiple strategies.

All levels of government — as well as non-profit advocacy groups, the private sector and Bay Area residents — have a role to play in implementing the strategies. Specific actions and roles for MTC and ABAG are identified in Chapter 6: Implementation Plan.

This chapter also describes Bay Area locations where the plan proposes future job and housing growth, known as Growth Geographies. Finally, this chapter provides additional context on Transit 2050+, a parallel transportation planning effort that generated a proposed network of transit policies and investments, and ultimately informed this plan's five transit-related strategies.

What's Changed Since the Prior Plan?

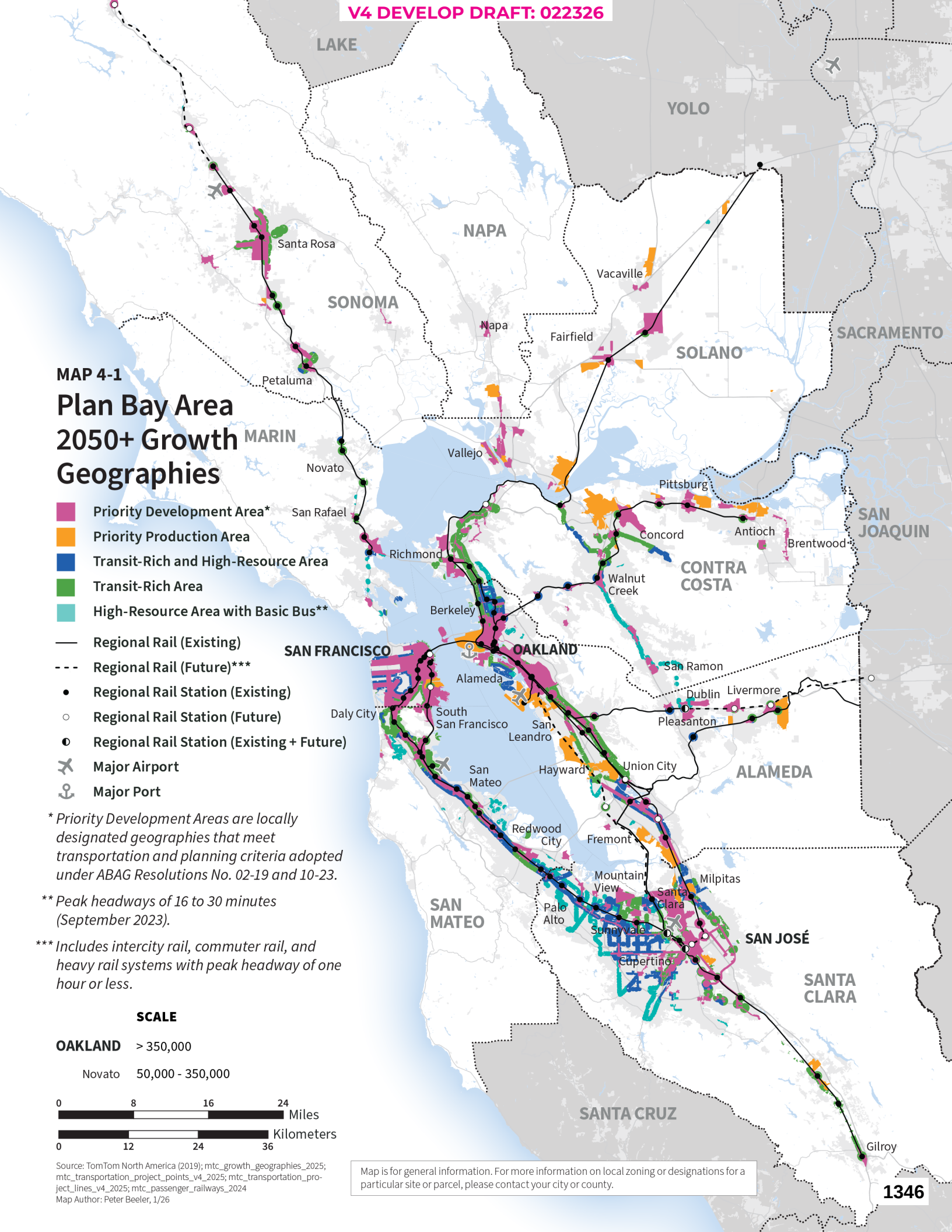
Plan Bay Area 2050+ is a focused update to Plan Bay Area 2050 that better accounts for post-pandemic impacts, especially the more significant financial and political constraints that result in lower revenues for transportation strategies. This plan also incorporates new analysis done since 2021, leveraging the foundation of the past plan with updated data and findings. Many strategies have been refreshed to reflect shifting societal conditions or incorporate progress on Plan Bay Area 2050 strategy implementation since 2021. The tables that follow detail the 35 strategies and specific changes since the last plan, including what public feedback or policy context led to those changes.

Focusing Jobs and Housing in Growth Geographies

Growth Geographies are the places where the vast majority of new housing and jobs would be located through 2050 under this plan. MTC and ABAG encourage growth in these locations by supporting local planning efforts, advancing regional policies, and funding infrastructure investments to support infill development. The Growth Geographies, shown on Map 4-1, include:

- **Priority Development Areas (PDAs)** — Areas generally near existing job centers or frequent transit that are locally proposed (i.e., identified by towns, cities or counties) for housing and job growth.
- **Priority Production Areas (PPAs)** — Industrial areas that are important to the regional economy and local middle-wage job growth. Like PDAs, PPAs are identified by local governments.
- **Transit-Rich Areas** — Places near rail, ferry or frequent bus service that were not already identified as PDAs, including all areas outside PDAs subject to MTC's Transit-Oriented Communities Policy.[1]
- **High-Resource Areas** — State-identified places with well-resourced schools, transit service and access to jobs, among other criteria.[2]

1. In jurisdictions where local governments have nominated PDAs on less than 50% of the land eligible for nomination, this also includes areas within 1/2 mile of a bus stop with peak service frequency of 15 minutes or less as defined during Plan Bay Area 2050.
2. This designation only includes places that meet a baseline transit service threshold of bus service with peak headways of 30 minutes or better as defined during Plan Bay Area 2050. In addition, High-Resource Areas are only included if less than 50% of land eligible for Priority Development Area designation has been nominated by the local jurisdiction in question. Plan Bay Area 2050+ High-Resource Areas are a subset of high-opportunity areas identified statewide by the California Department of Housing and Community Development that meet a minimum transit service threshold and are located in the Bay Area. See more at: https://www.treasurer.ca.gov/ctcac/opportunity.asp



MAP 4-1

Plan Bay Area 2050+ Growth Geographies

- Priority Development Area*
- Priority Production Area
- Transit-Rich and High-Resource Area
- Transit-Rich Area
- High-Resource Area with Basic Bus**
- Regional Rail (Existing)
- Regional Rail (Future)***
- Regional Rail Station (Existing)
- Regional Rail Station (Future)
- Regional Rail Station (Existing + Future)
- Major Airport
- Major Port

* *Priority Development Areas are locally designated geographies that meet transportation and planning criteria adopted under ABAG Resolutions No. 02-19 and 10-23.*

** *Peak headways of 16 to 30 minutes (September 2023).*

*** *Includes intercity rail, commuter rail, and heavy rail systems with peak headway of one hour or less.*

SCALE

OAKLAND > 350,000

Novato 50,000 - 350,000

0 8 16 24 Miles

0 12 24 36 Kilometers

Source: TomTom North America (2019); mtc_growth_geographies_2025; mtc_transportation_project_points_v4_2025; mtc_transportation_project_lines_v4_2025; mtc_passenger_railways_2024

Map Author: Peter Beeler, 1/26

Map is for general information. For more information on local zoning or designations for a particular site or parcel, please contact your city or county.

Photo: Noah Berger

Identifying Key Strategies for the Region's Future

This plan's 35 strategies work together across all four elements to provide residents greater access to transportation, housing and jobs while protecting the Bay Area's natural resources. These interconnected elements and strategies overlap and work together to guide growth and address residents' priorities.

Transportation strategies support the plan's housing, economic and environmental sustainability goals by providing residents with more affordable, sustainable travel choices for commuting and beyond — especially more frequent, reliable local transit. The plan works toward transit-oriented, mixed-use communities in vibrant, recovered downtowns and main streets.

Housing, economic and environmental strategies together help protect important areas from new development — especially industrial and agricultural lands — while enhancing urban and residential areas with new parks and decarbonized buildings. Abundant affordable housing could be built while still protecting land and homes from wildfire and sea level rise. All together, these strategies can guide the Bay Area to a more affordable, connected, diverse, healthy and vibrant future.

Equity Priority Communities

Many of the plan's strategies in this chapter prioritize **Equity Priority Communities** — geographic areas that have a concentration of both residents of color and residents with low incomes, or that have a concentration of residents with low incomes and other factors such as limited English proficiency, older people or people with disabilities. See Chapter 5: Improving Outcomes and the Performance and Equity Analysis Reports for the full list of factors and the data used to identify these communities.

Photo: VTA Archive

Transportation Element

Element Description

Twelve transportation strategies work together toward creating a Bay Area where everyone gets to their destinations easily, safely and on time — whether by transit, by car or without a vehicle. First, strategies that maintain and enhance the Bay Area's current transportation system ensure that drivers and transit riders can rely on, and look forward to improvements in, their present options. Strategies geared toward active transportation like walking and biking also aim to make roads safer and residents healthier. Finally, a new vision for transit in the region is laid out through Transit 2050+ and its related strategies (with full details available in the separate Transit 2050+ Report).

The Transportation Element also has a unique federal funding component that differs from the housing, economy and environment elements. Each long-range plan in the U.S. must contain a fiscally constrained Transportation Project List, which spells out the capital, operating and total costs for each transportation strategy. Any major project hoping to advance to construction in the Bay Area must first be included on the list to receive funding. The Transportation Project List is nested within the Transportation Strategies (with a few projects nesting under Environment Element strategies too), and the full list is available as a separate report.

What We Heard: Transportation

At in-person workshops and through online surveys, Bay Area residents told MTC and ABAG about changes in their travel behavior since the onset of the pandemic and their transportation priorities for the future. They wanted to see transit improvements regionwide — especially related to frequency, convenience, safety and cleanliness. Residents also expressed that they do not feel safe choosing healthier, more active transportation options in a system designed primarily for driving, while others said they prefer driving and would like to to see road improvements.

Theme: Maintain and Optimize the Existing System

Theme Description	Fully funding the Bay Area's existing transportation system remains a top priority under MTC's longstanding "Fix It First" Policy, reflected in Strategy T1. First and foremost, the plan identifies funding to operate and maintain our existing network of transit routes, roads and bridges. Transit and road optimization strategies then build on this foundation, addressing conditions for riders and drivers that would save time, money and peace of mind.
Strategy Revisions	Strategy T4, which addresses safety and cleanliness on transit, was added as a new strategy in response to community and partner feedback. Strategy T5 was significantly informed and refined by the Next Generation Bay Area Freeways Study, weaving together regionwide road pricing, expanded parking pricing and cordon pricing with expanded equity considerations. Strategies T6 and T7 were split to better clarify capacity and non-capacity road projects and to integrate mitigation costs.

Transportation Strategies: Maintain and Optimize the Existing System

T1: Operate and Maintain the Existing System. Commit to operate and maintain the Bay Area's roads and transit infrastructure while transitioning to zero-emission transit vehicles.	**$380 Billion**
T2: Improve the Rider Experience through Transit Network Integration. Deliver regionwide efforts to improve the rider experience, including an integrated fare structure, unified mapping and wayfinding, and improved paratransit services.	**$6 Billion**
T3: Improve the Rider Experience through Refined Transfer Timing at Key Regional Hubs. Deliver regionwide efforts to improve the coordination of inter-agency schedules, refine transfer timing at key regional hubs, and upgrade facilities to encourage easier transfers.	**$1 Billion**
T4: Enhance Security Measures and Improve Safety and Cleanliness on Transit. Improve infrastructure and operations around safety, personal security, and cleanliness in the transit environment.	**$4 Billion**
T5: Implement Pricing Strategies to Manage Demand. Implement a series of usage-based pricing strategies to ease traffic, reduce vehicle mileage, and support climate goals; reinvest fees and charges towards corridor and transit improvements.	**$5 Billion**
T6: Modernize Freeways and Interchanges. Implement projects designed to improve the quality of existing freeway assets by rebuilding interchanges and implementing advanced technologies.	**$7 Billion**
T7: Expand Freeways and Mitigate Impacts. Implement a targeted set of freeway widening to reduce bottlenecks, while supporting complementary actions to mitigate VMT impacts.	**$4 Billion**
T8: Advance Other Regional Programs and Local Priorities. Fund regional programs like motorist aid and 511 while supporting local transportation investments on arterials, local streets, and in Equity Priority Communities.	**$12 Billion**

Photo: Noah Berger

The Future of Freeways: The Next Generation Bay Area Freeways Study

MTC launched the Next Generation Bay Area Freeways Study (Next Generation Study) in 2022 to address the longstanding complaint about Bay Area traffic and explore whether tolls on select freeways across the region could reduce congestion and greenhouse gas emissions. The study aimed to develop equitable, politically viable pathways toward a priced, modern and multi-modal freeway network that is reliable, efficient, affordable, reparative and safe for all, while advancing outcomes that support Equity Priority Communities.

The study was developed in collaboration with the California Department of Transportation (Caltrans), county transportation agencies, the MTC Policy Advisory Council and a project Advisory Group. The Advisory Group included members of low-income communities; communities of color; business organizations; labor unions; freight, agriculture and non-profit sectors; youth; academia; and local and state agencies.

By first focusing on freeway corridors that also are served by reliable public transit service, the study examined the potential for new tolls to increase drivers' use of transit or shift them to carpooling rather than driving solo. To maximize emissions reduction and promote geographic equity, the focus eventually expanded to all freeway corridors. Following rigorous analysis, the study identified two potential pathways for further examination: first, all-lane, per-mile tolling on all freeways during peak weekday driving hours; and second, a regional, mileage-based, all-hours user fee for all Bay Area roads. In either case, the role of Express Lanes, and their ability to operate alongside these tolls or fees, would need to be carefully evaluated. A third pathway, centered on two priced lanes on all freeways, was ultimately deemed unable to advance the study's goals, but could still be explored as an interim step.

While the Next Generation Study did not ultimately recommend a singular pricing strategy, it informed significant revisions to Strategy T5: Implement Pricing Strategies to Manage Demand. This strategy previously focused only on all-lane freeway tolling, but it now weaves together all-lane freeway tolling with policies to minimize impacts on low-income households, while acknowledging that the approach will need to be revisited in the next plan.

The "other pricing options" referenced in Strategy T5 refer to the strategy scope now encompassing cordon pricing, specifically in San Francisco and Treasure Island, and parking pricing in areas targeted for housing and job growth.

***MAP 4-2** shows Plan Bay Area 2050+ investments in highway widening and express lanes, alongside pricing initiatives like toll bridges, user-based pricing and congestion pricing. Together these highway-focused strategies would ease travel times throughout the Bay Area by 2050.*

Alignments are for illustrative purposes only. Improvements to local streets and roads or local interchange projects are not shown. For more information on the individual transportation projects included in Plan Bay Area 2050+, see the Transportation Project List.

MAP 4-2

Highway & Pricing Investments

HIGHWAY WIDENING
- New Carpool Lane
- New General Purpose Lane
- Major Interchange Improvement

EXPRESS LANES
- Existing
- Under Construction
- New Lane
- Existing Lane Conversion

PRICING
- Existing Toll Bridge Corridor
- New BAIFA Toll Corridor
- Usage-Based Pricing Strategy (Plan Bay Area 2050+ Strategy)
- Congestion Pricing Zone

REGIONAL TRANSPORTATION
- Major Airport
- Major Seaport
- Major Road
- Highway and Interstate

SCALE

OAKLAND > 350,000
Novato 50,000 – 350,000

0 8 16 24 Miles
0 12 24 36 Kilometers

LAKE
YOLO
NAPA
SONOMA
MARIN
SOLANO
SACRAMENTO
CONTRA COSTA
SAN JOAQUIN
ALAMEDA
SAN MATEO
SANTA CLARA
SANTA CRUZ
SAN FRANCISCO
OAKLAND
SAN JOSE
Santa Rosa
Petaluma
Novato
San Rafael
Richmond
Berkeley
Alameda
Daly City
South San Francisco
San Mateo
Redwood City
Palo Alto
Mountain View
Sunnyvale
Cupertino
Santa Clara
Milpitas
Fremont
Hayward
San Leandro
Union City
San Ramon
Dublin
Pleasanton
Livermore
Walnut Creek
Concord
Pittsburg
Antioch
Brentwood
Vallejo
Fairfield
Vacaville
Napa
Gilroy
STS
SFO
OAK
SJC

TomTom North America (2019);
Metropolitan Transportation Commission, Transportation Project List Interchange Points and Lines (2025)
Map Author: Peter Beeler 8/21, update Mimi Heft 1/26

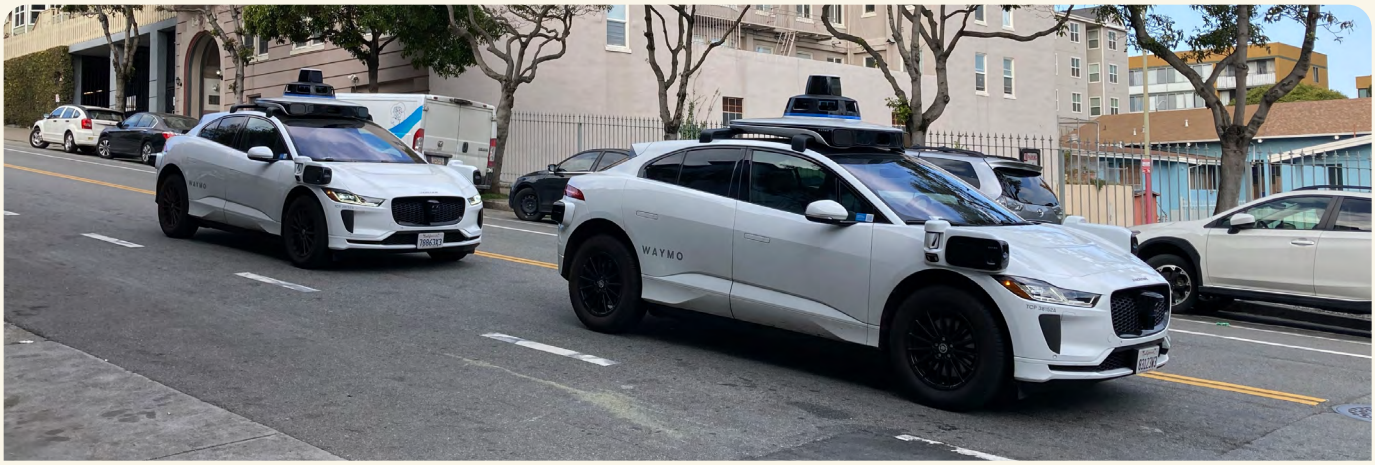


Photo: Joey Kotfica

Autonomous Vehicles in the Bay Area

Autonomous vehicles (AVs) span a range of technologies, from widely used driver-assistance features to fully driverless systems that remain tightly regulated. California's 2025 AV regulations introduce phased permits, enhance safety oversight and expand reporting requirements, reflecting continued public uncertainty about large-scale deployment even as technological progress accelerates.[3] Local and state agencies also are strengthening governance frameworks to prepare for AV adoption. The San Francisco County Transportation Authority has adopted a safety-focused approach to AV permitting, and the California Public Utilities Commission has expanded incident and stoppage reporting to improve transparency and oversight.[4,5]

Meanwhile, in the Bay Area, AV activity continues to evolve unevenly. In San Francisco, hundreds of Waymo driverless robotaxis currently navigate the streets, and the company in late 2025 received authorization to expand service to freeways in all nine Bay Area counties.[6] Other companies, including Uber, are testing AV services with safety drivers. In many parts of the region, however, no AV companies are operating at all. Another AV company, Cruise, concluded public Bay Area operations following safety and financial challenges.[7] These mixed outcomes underscore both the potential and volatility of AV deployment in the near term.

Plan Bay Area 2050+ acknowledges both the benefits and risks of autonomous vehicles: they could improve safety, expand mobility for people who cannot drive and increase system efficiency, but they may also increase traffic, weaken transit or reshape land use and labor markets in ways that could undermine other regional priorities. The plan does not ignore this emerging technology; instead, it incorporates AVs into its modeling, assuming conservative adoption rates of about 5% of the passenger vehicle fleet by 2035 and 20% by 2050, primarily through AV-centric transportation network companies. Given the high uncertainty around the pace and form of deployment, the plan pairs this modeling approach with policies designed to protect transit ridership, manage travel demand, promote equitable access, and ensure that AVs, if they scale, advance the region's affordability, mobility, climate and equity goals.

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Theme: Create Healthy and Safe Streets

Theme Description	Two transportation strategies focus on creating safer roads for all, especially for those who use active transportation modes like walking, biking, wheelchairs or scooters.
Strategy Revisions	Strategy refinements focused on making roads safer for all users. The scope of the Complete Streets Network was expanded to include the entire regional Active Transportation Network and to ensure that facilities accommodate all ages and abilities. While Plan Bay Area 2050 aligned its efforts with Vision Zero (an international road traffic safety project that aims to eliminate all fatalities and serious injuries on roadways), this plan has shifted to emphasize safer transportation along the Bay Area's "High Injury Network," where injuries are highest, along with more effective street design elements.

Transportation Strategies: Create Healthy and Safe Streets

T9: Build a Complete Streets Network. Enhance streets, paths, and trails to promote walking, biking, and rolling through sidewalk improvements, car-free slow streets, and All Ages and Abilities Active Transportation Network.

$9 Billion

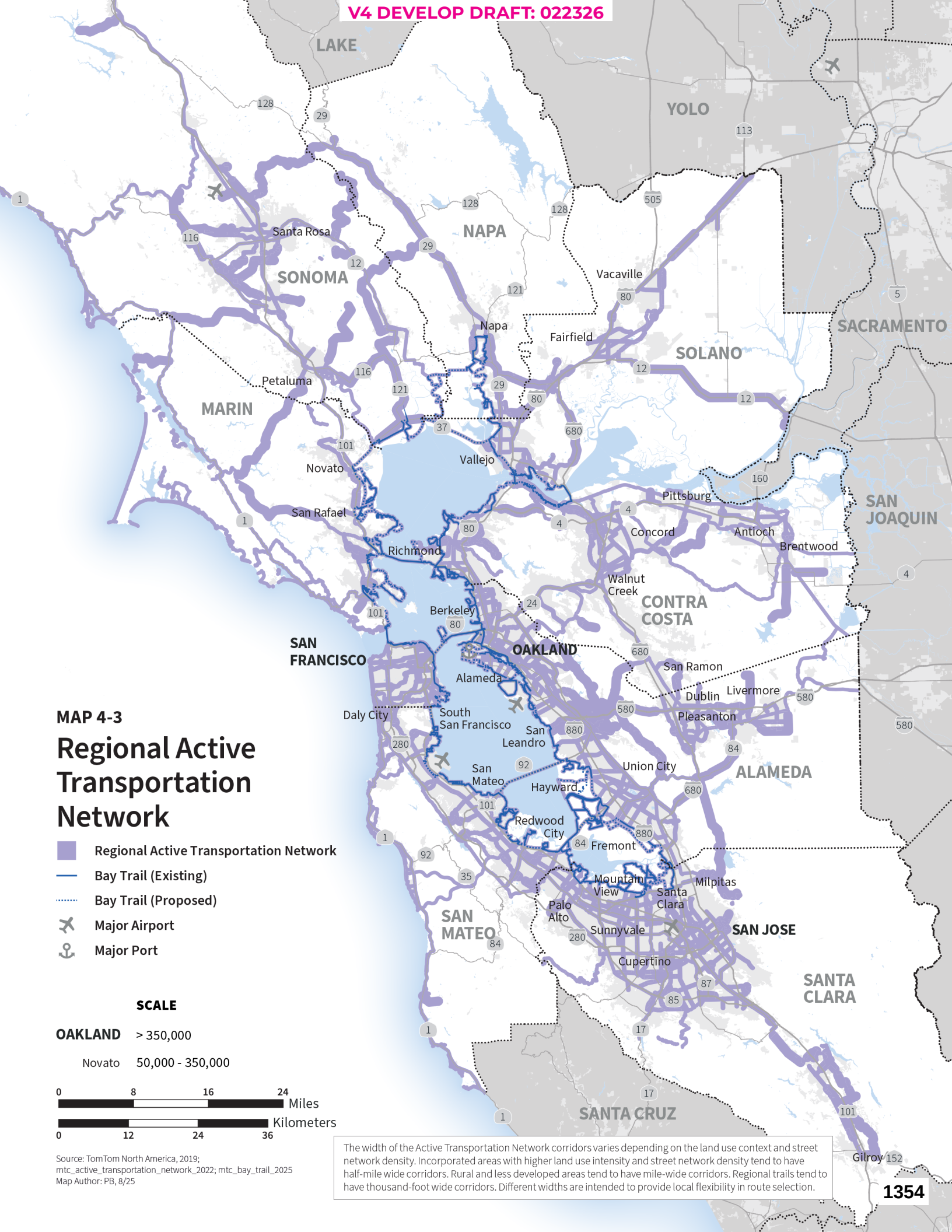
T10: Advance Regional Vision Zero Policy through Street Design and Reduced Speeds. Implement street design elements on local streets and automated speed enforcement on freeways to reduce speed limits to between 20 and 35 miles per hour on local streets, especially those within the High Injury Network, and to 55 miles per hour on freeways.

$1 Billion

***MAP 4-3** shows the Regional Active Transportation Network throughout the Bay Area, established by MTC's Regional Active Transportation Plan in 2023. This network focuses the plan's efforts to provide safe connections for all ages and abilities by selecting areas in the region with three factors:*

1. *The highest potential for shifting auto trips to biking and walking trips*
2. *The greatest need for affordable transportation options*
3. *The highest potential to connect active trips with transit*

The network supports strategies to build a Complete Streets network (T9) and advance regional Vision Zero policy through street design and reduced speeds (T10).



MAP 4-3

Regional Active Transportation Network

- Regional Active Transportation Network
- Bay Trail (Existing)
- Bay Trail (Proposed)
- Major Airport
- Major Port

SCALE

OAKLAND > 350,000

Novato 50,000 - 350,000

0 8 16 24 Miles

0 12 24 36 Kilometers

Source: TomTom North America, 2019; mtc_active_transportation_network_2022; mtc_bay_trail_2025
Map Author: PB, 8/25

The width of the Active Transportation Network corridors varies depending on the land use context and street network density. Incorporated areas with higher land use intensity and street network density tend to have half-mile wide corridors. Rural and less developed areas tend to have mile-wide corridors. Regional trails tend to have thousand-foot wide corridors. Different widths are intended to provide local flexibility in route selection.

Theme: Build a Next-Generation Transit Network

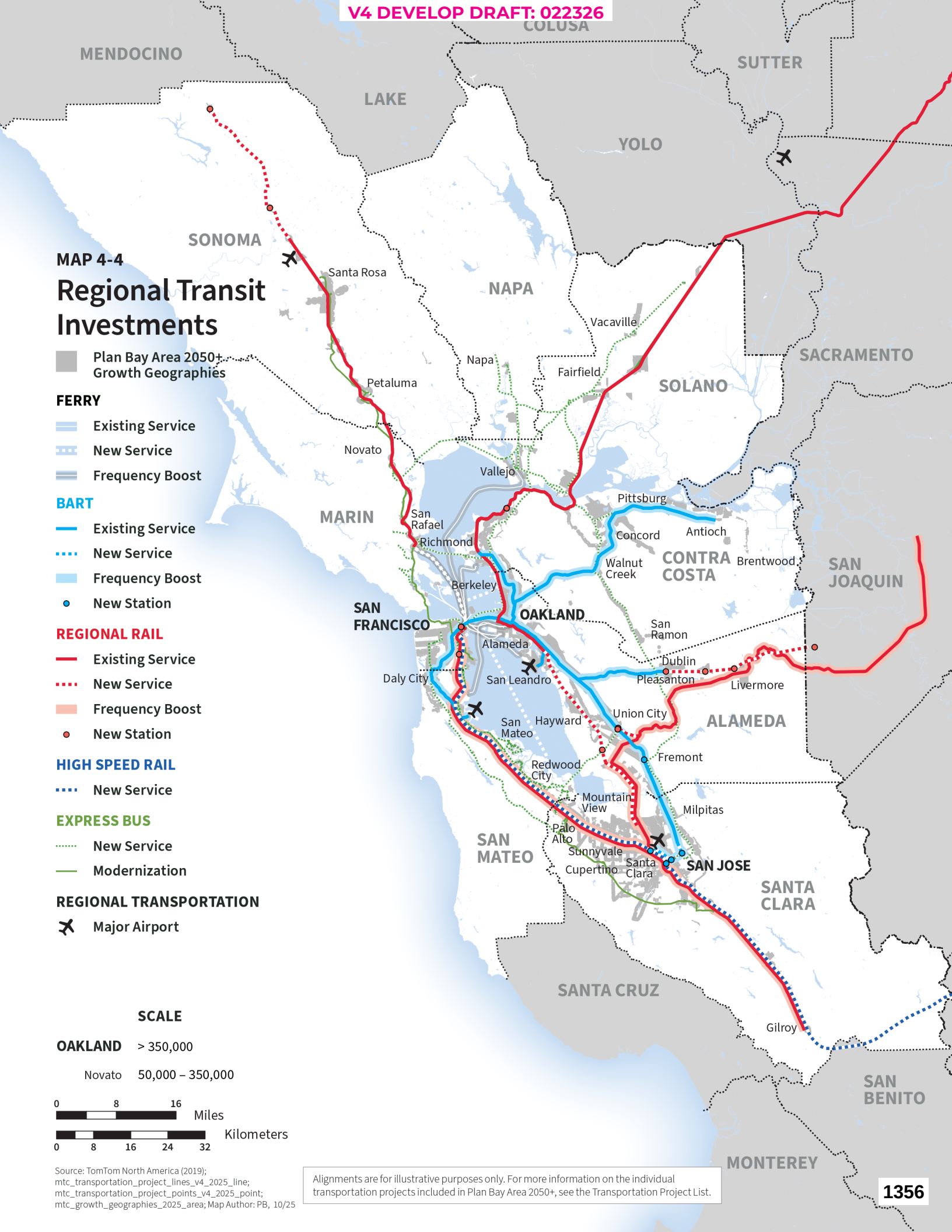
Theme Description	Two strategies outline a slate of transit investments through 2050 that would steer the Bay Area toward a 21st century system that meets the needs of a growing population by providing fast, frequent and reliable transit service throughout the region. Strategy T11 includes expansive yet cost-effective transit service and facility enhancement investments, while Strategy T12 includes a smaller number of high-cost capital investments to expand the physical reach of transit services.
Strategy Revisions	The parallel Transit 2050+ process completely overhauled these two strategies to develop a service-based and fiscally responsible transit system in the Bay Area. These strategies aim to make transit more reliable, frequent, convenient and expansive throughout the Bay Area. However, less money is available overall for transit projects relative to the last long-range plan, so Transit 2050+ had to lean into lower-cost investments rather than megaprojects.

Transportation Strategies: Build a Next-Generation Transit Network

T11: Enhance Transit Frequency, Capacity and Reliability. Improve the quality and availability of existing transit services, including improvements for equity priority populations. **$44 Billion**

T12: Expand Transit Services throughout the Region. Better connect communities by strategically expanding transit services to new markets and previously unserved or underserved areas, including the addition of new infrastructure. **$28 Billion**

MAP 4-4 outlines the regional impact of Transit 2050+ Strategies T11 and T12, showing new and existing service, along with frequency improvements, across BART and other rail, buses, and ferries for a more connected 2050.



MAP 4-4

Regional Transit Investments

Plan Bay Area 2050+ Growth Geographies

FERRY
- Existing Service
- New Service
- Frequency Boost

BART
- Existing Service
- New Service
- Frequency Boost
- New Station

REGIONAL RAIL
- Existing Service
- New Service
- Frequency Boost
- New Station

HIGH SPEED RAIL
- New Service

EXPRESS BUS
- New Service
- Modernization

REGIONAL TRANSPORTATION
- Major Airport

SCALE

OAKLAND	> 350,000
Novato	50,000 – 350,000

0 8 16 Miles

0 8 16 24 32 Kilometers

Source: TomTom North America (2019); mtc_transportation_project_lines_v4_2025_line; mtc_transportation_project_points_v4_2025_point; mtc_growth_geographies_2025_area; Map Author: PB, 10/25

Alignments are for illustrative purposes only. For more information on the individual transportation projects included in Plan Bay Area 2050+, see the Transportation Project List.

Photo: Joey Kotfica

Creating a Vision for a Robust, Connected Bay Area Transit Network Through Transit 2050+

The outsized impact of the pandemic on the Bay Area's public transit system cannot be overstated. MTC and local transit agencies worked together on a new approach to transit strategies in light of lasting post-pandemic trends that changed travel patterns, including higher work-from-home rates. While much of Plan Bay Area 2050+ represents a limited and focused update to the region's previous long-range plan, transit strategies have been fully reenvisioned.

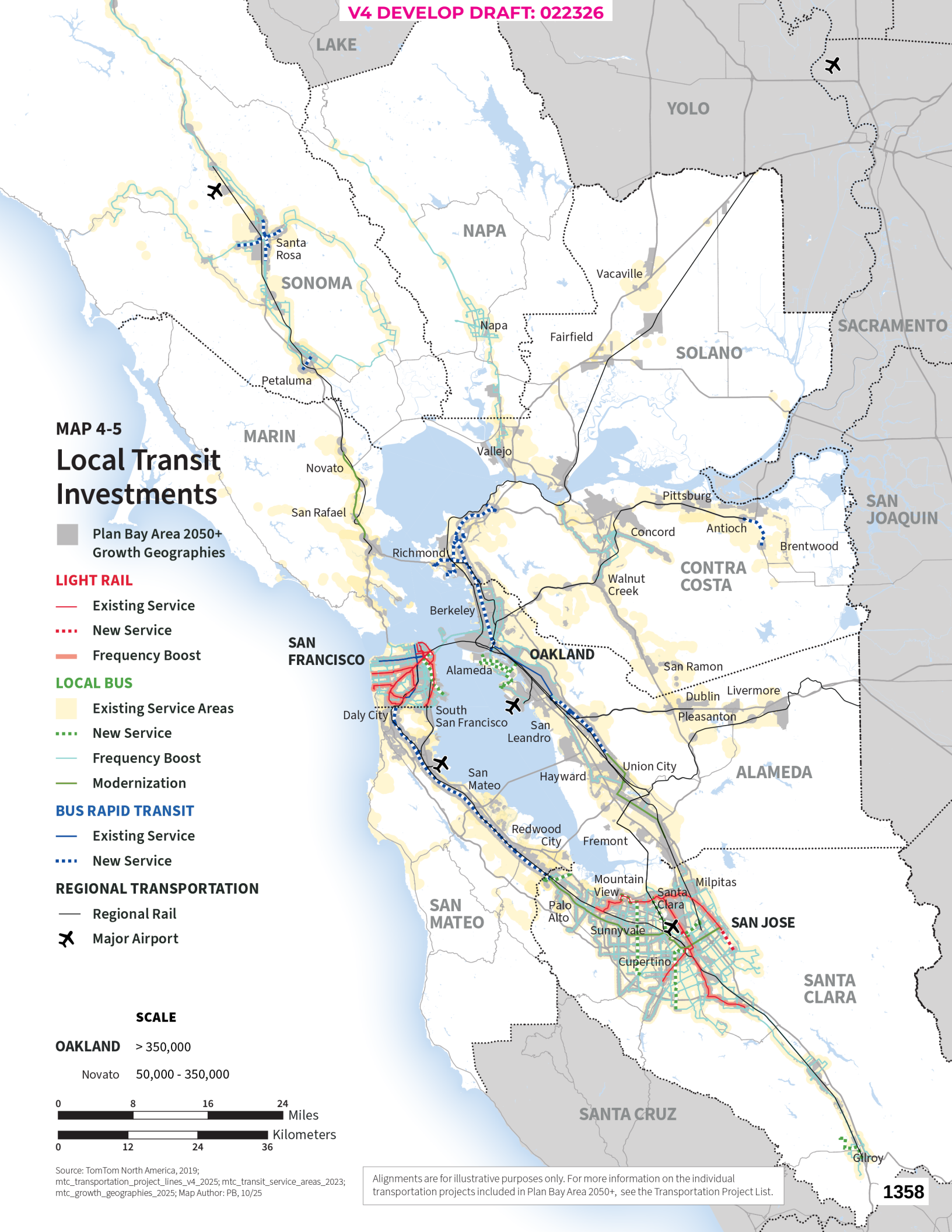
MTC convened the Blue Ribbon Transit Recovery Task Force in 2020 to initiate transit recovery work at a regional scale. The group ultimately developed the Bay Area Transit Transformation Action Plan in 2021, which identified a suite of near-term actions focused on improving transit customers' experiences and increasing transit ridership. One of these actions called for development of a connected network plan for Bay Area transit. Collaboration among the Bay Area's 27 independent transit agencies, along with support from MTC and the nine county transportation authorities, would be needed to develop this regional, interconnected plan for future transit services.

Informed by the Transit Transformation Action Plan, MTC convened 12 Bay Area transit agencies — large to small, representing geographies across all nine Bay Area counties — for Transit 2050+. This group evaluated existing conditions in order to integrate post-pandemic data about transit service, looking at land use and regional travel patterns since 2020. Post-pandemic transit service needs and gaps were analyzed and used to identify and prioritize transit service and capital projects.

To understand projects' potential cost-effectiveness and equity impacts, as well as inform the fiscally constrained Transit 2050+ Draft Network, MTC and the transit agency team conducted a project performance assessment. Importantly, projects did not just consist of capital projects; rather, they primarily included operational improvements to boost service. Last but not least, a network performance assessment estimated how, if implemented, the Transit 2050+ Final Network could improve access to jobs and other destinations, enhance transit operating speeds, and increase transit ridership throughout the region.

Ultimately, a Transit 2050+ Final Network recommendation, informed and refined by performance findings, public input and technical expertise, was brought before MTC in late 2024. To ensure that a singular vision for transit was reflected in the more comprehensive regional plan, the Final Network was woven into Plan Bay Area 2050+ through its five transit-related strategies. More information about the Transit 2050+ process, the development of the transit strategies, and maps that highlight specific improvements to the network can be found in the Transit 2050+ Report.

> ***MAP 4-5** focuses on local investments under Transit 2050+ strategies (T11 and T12), showing new and existing service, plus frequency boosts, across local light rail, bus and bus rapid transit networks.*



MAP 4-5

Local Transit Investments

Plan Bay Area 2050+ Growth Geographies

LIGHT RAIL

- Existing Service
- New Service
- Frequency Boost

LOCAL BUS

- Existing Service Areas
- New Service
- Frequency Boost
- Modernization

BUS RAPID TRANSIT

- Existing Service
- New Service

REGIONAL TRANSPORTATION

- Regional Rail
- Major Airport

SCALE

OAKLAND > 350,000

Novato 50,000 - 350,000

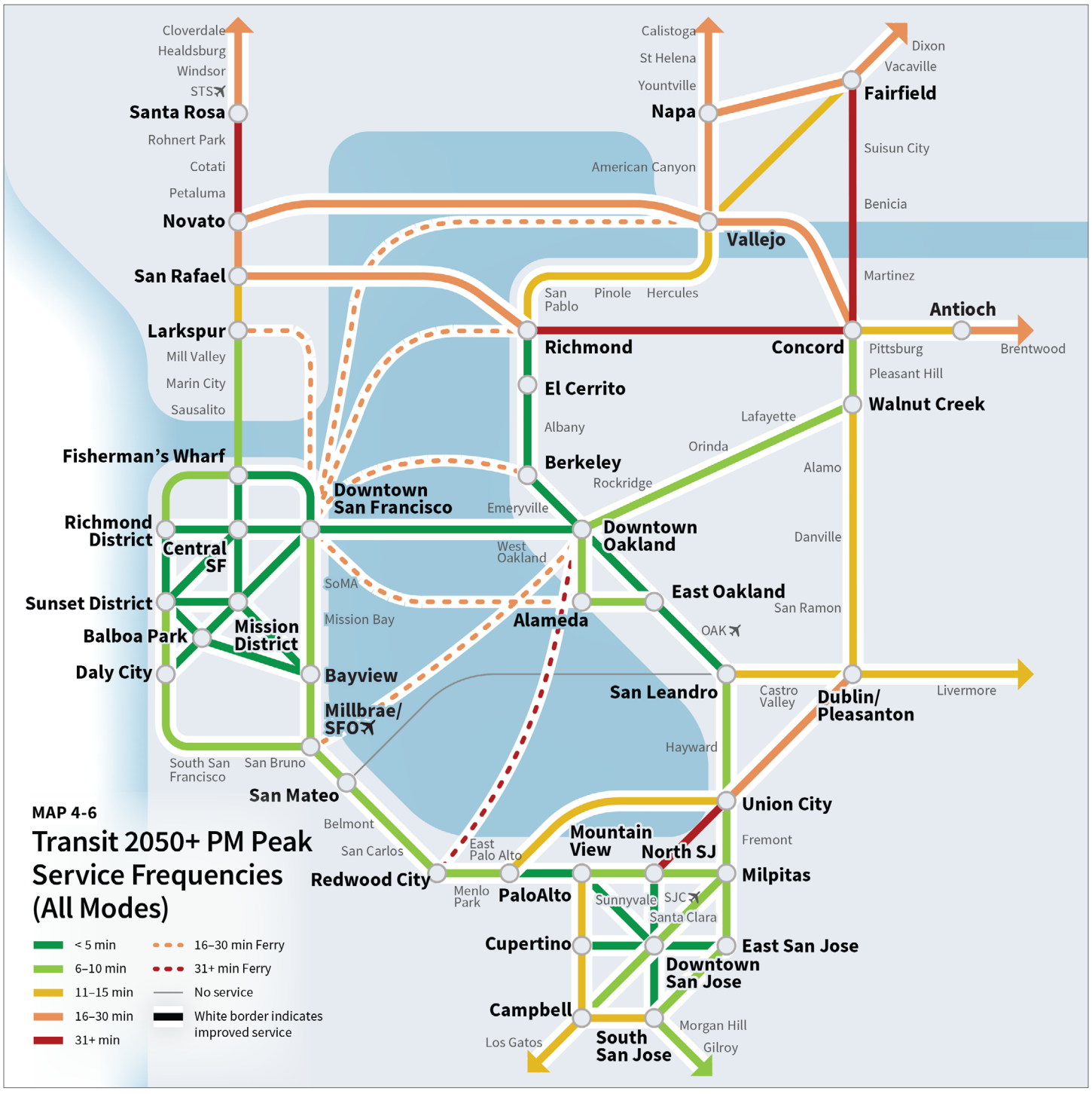
0 8 16 24 Miles

0 12 24 36 Kilometers

Source: TomTom North America, 2019; mtc_transportation_project_lines_v4_2025; mtc_transit_service_areas_2023; mtc_growth_geographies_2025; Map Author: PB, 10/25

Alignments are for illustrative purposes only. For more information on the individual transportation projects included in Plan Bay Area 2050+, see the Transportation Project List.

Map 4-6: Transit 2050+ PM Peak Service Frequencies (All Modes)



***MAP 4-6** shows popular bus, train and ferry routes around the Bay Area, highlighting potential evening rush hour frequency improvements if Transit 2050+ strategies are implemented. Dark green lines show transit that arrives every 5 minutes or less; light green lines show transit that arrives every 6-10 minutes; yellow lines show arrivals every 11-15 minutes; orange shows transit arrivals every 16-30 minutes; and red shows more than 31 minutes.*

Housing Element

Element Description

Plan Bay Area 2050+ prioritizes affordable housing options for all Bay Area residents, particularly for residents with the lowest incomes and highest needs. The eight housing strategies focus on producing more housing at all affordability levels, preserving the region's existing affordable housing and protecting renters from the effects of the Bay Area's high housing costs.

What We Heard: Housing

Bay Area residents consistently cite housing affordability as their top regional concern, and public feedback gathered for this plan revealed the same lasting problem: Not enough housing is affordable even to those with moderate or high incomes, and those with lower incomes all too often face displacement and homelessness.

	Theme: Protect and Preserve Affordable Housing
Theme Description	Two strategies focus on expanding housing security and homeownership pathways for those most in need by strengthening renter protections and preserving existing affordable housing.
Strategy Revisions	Strategy H2 was expanded to integrate a wider range of housing financing and ownership models available to residents with low and middle incomes.

Housing Strategies: Protect and Preserve Affordable Housing

H1: Strengthen Renter Protections. Expand measures to increase housing security for renters, including tenant support services, enforcement of tenant legal protections, and limits on rent increases that exempt new construction.	**$2 Billion**
H2: Preserve Existing Affordable Housing. Acquire homes currently affordable to low- and middle-income residents for preservation as permanently deed-restricted affordable housing, including opportunities for resident ownership.	**$250 Billion**

Theme: Spur Housing Production at All Income Levels

Theme Description	Four strategies work together to encourage more diverse types of housing production at all affordability levels in all Bay Area counties. Housing production is prioritized in Growth Geographies near jobs, existing housing and other resources, where more housing types and densities could grow in the future. These strategies prioritize creative solutions such as new affordable housing financing methods and reuse of existing sites, like malls and office parks, for housing.
Strategy Revisions	Strategy refinements within this theme respond to policymaker and public concerns about high Bay Area housing prices and construction costs. Most significantly, Strategy H4: Build Adequate Affordable Housing to Ensure Homes for All integrates expanded cost-saving measures for projects receiving affordable housing funding as well as more financial support for innovative housing types. Strategy H3, which would allow a greater mix of housing densities and types in Growth Geographies, was revised to ensure all Transit-Oriented Communities are identified as Transit-Rich Areas. It also now emphasizes streamlining review, updating building codes to enable a wider range of residential building types, and making targeted parking reductions to reduce the costs and timelines for new construction. Strategy H6, which would transform malls and offices into neighborhoods, was revised to align with the new cost-saving measures included in Strategy H4, which would fund affordable housing projects built on these mall and office sites. The scope of Strategy H6 was also expanded to include MTC-ABAG Priority Sites — specific sites that local communities identify to meet housing needs through redevelopment.[8]

Housing Strategies: Spur Housing Production at All Income Levels

H3: Allow a Greater Mix of Housing Densities and Types in Growth Geographies. Allow a mix of housing types at a range of densities and in a variety of building configurations to be built in Priority Development Areas, select High-Resource Areas, and select Transit-Rich Areas, including areas where the Transit-Oriented Communities Policy applies, augmented by streamlined review and reduced parking requirements for affordable homes, as well as building code updates.	**<$1 Billion**
H4: Build Adequate Affordable Housing to Ensure Homes for All. Construct enough deed-restricted affordable homes to fill the existing gap in housing for the unhoused community and to meet the needs of low-income households; provide easy-to-access funding for projects that leverage public or discounted private land, utilize streamlined entitlement, commit to efficient design and delivery measures; support a greater variety of building types, construction technologies and ownership models.	**$236 Billion**
H5: Integrate Affordable Housing into All Major Housing Projects. Require a baseline of 10% to 20% of new market-rate housing developments of five units or more to be affordable to low-income households.	**<$1 Billion**
H6: Transform Aging Malls and Office Parks into Neighborhoods. Permit and promote the reuse of shopping malls and office parks with limited commercial viability as neighborhoods with housing for residents at all income levels, including locally-designated Priority Sites.	**<$1 Billion**

8. Compared to PDAs and PPAs, which cover sections of a given jurisdiction, Priority Sites are specific sites that may be located within a broader Growth Geography.

Creating a Bay Area With Affordable Housing for All Residents: Joint Efforts Between BAHFA, MTC and ABAG

Plan Bay Area 2050+ envisions housing as a human right, and its Housing Element works toward securing a safe, affordable home for every Bay Area resident. Plan Bay Area 2050 (approved in 2021) introduced this framework and suggested collaboration between MTC, ABAG and the Bay Area Housing Finance Authority (BAHFA), a regional public agency created by state legislators in 2019 with the goal of finding better solutions for the Bay Area's affordable housing needs. BAHFA, MTC and ABAG currently offer a set of housing pilot programs that follow the 3Ps of housing framework to *protect* existing residents from housing insecurity, *preserve* today's affordable housing, and *produce* enough affordable homes to meet future needs. The pilots offer solutions for current residents while also informing important lessons for future regional housing efforts.

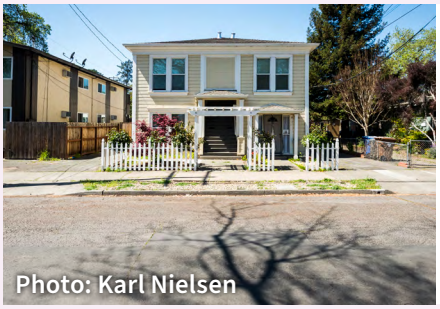


Photo: Karl Nielsen

The **Homelessness Prevention Pilot** works toward Strategy H1 by combining regionwide research to improve the design of local policies and programs. The pilot program provides rent subsidies for up to four years to extremely low-income seniors and people with disabilities at risk of displacement. As of June 2025, the program is serving 74 seniors in Napa County.

Photo: Joey Kotfica

The **Housing Preservation Loan Pilot** advances Strategy H2 by helping mission-driven housing developers buy and rehabilitate residential properties, which are then converted to permanently affordable housing. As of spring 2025, the pilot has preserved 34 homes in neighborhoods greatly impacted by rising rents and longtime-resident displacement in San José, San Francisco and Sonoma County.

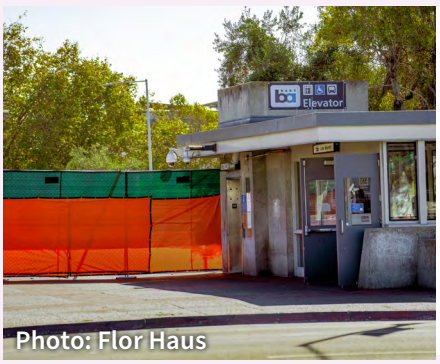


Photo: Flor Haus

The **Priority Sites Pilot** combines guidance for more than 200 locally nominated sites capable of driving future housing innovation across the region. The pilot provides funding and technical assistance for select sites, working toward Strategies H6 and H8. Together, the sites have capacity to add 171,000 new homes. As of 2025, the pilot's predevelopment loans have already enabled senior housing to break ground atop the Lake Merritt BART station and 800 units of much-needed, mixed-income housing to advance on publicly owned land in South San Francisco.

Ultimately, realizing a shared vision for housing will require a substantial influx of public and private dollars, but the innovations that emerge through these pilot programs can help point the way forward. In 2024, MTC and ABAG explored taking a historic $20 billion regional housing bond measure to Bay Area voters, but public support was not high enough before the election to be assured of passage. While the measure was ultimately withdrawn, it provided a strong foundation for further legislative advocacy efforts that could work toward large-scale affordable housing funding.

Photo: Joey Kotfica

Solutions for Reducing Housing Production Costs

The Bay Area needs to build much more housing for households with low incomes. An uncertain near-term outlook on housing funding means that regional leaders and residents alike share concerns about the best path forward to create new housing in the region.

Rents in deed-restricted affordable housing units can only rise so high, and rents alone cannot fully pay back affordable building development costs. Public subsidies (tax credits, loans and bonds) make up development cost shortfalls, but current public funding is highly competitive, reaching just a subset of permitted affordable housing developments regionwide. In lieu of fully reforming the funding process, Plan Bay Area 2050+ considered policies that could deliver affordable housing more economically and efficiently, analyzing potential approaches alongside industry specialists like developers, designers, economists and real estate finance professionals.

This analysis informed revisions to Strategy H4: Build Adequate Affordable Housing to Ensure Homes for All. The highest-impact approaches include:

- Establishing a single, predictable source of affordable housing financing
- Encouraging low-cost development on public or discounted land
- Pursuing efficient project design and construction methods
- Expanding provisions that streamline 100% affordable housing projects more quickly through the permitting process

Combining these approaches into a single pathway could result in cost savings greater than 40% per unit in the future compared to costs today. Strategy H4 — which assumed more conservative cost savings regionwide and removed approaches with potential negative fiscal impacts to local governments like fee exemptions — integrates a cost reduction per unit of approximately 20%.

Theme: Create Inclusive Communities

Theme Description	Plan Bay Area 2050+ promotes inclusive communities where many different types of people can work, live and interact together. These two housing strategies work toward this goal by first, providing targeted mortgage, rental and small business assistance to communities with low incomes and communities of color; and second, accelerating the reuse of public and community-owned land for mixed-income housing.
Strategy Revisions	Strategy H8, which would accelerate reuse of public and community-owned land for housing, and Strategy H4, which would fund affordable housing projects built on these sites, work together to reduce per-unit housing costs through innovative financing options. Strategy H8 also was revised to integrate locally identified Priority Sites into eligible public land.

Housing Strategies: Create Inclusive Communities

H7: Provide Targeted Mortgage, Rental, and Small Business Assistance to Equity Priority Communities. Provide assistance to low-income communities and communities of color to address the legacy of exclusion and predatory lending, while helping to grow locally owned businesses.

$11 Billion

H8: Accelerate Reuse of Public and Community-Owned Land for Mixed-Income Housing and Essential Services. Help public agencies, community land trusts and other non-profit landowners accelerate the development of 100% affordable and mixed-income housing, supportive services, and public spaces, including on locally designated Priority Sites; offer easy-to-access funding to projects that commit to streamlined entitlement and innovative design and delivery.

<$1 Billion

Economy Element

Element Description

Plan Bay Area 2050+ envisions a Bay Area where all residents are secure in their finances and live in economically vibrant cities and towns where they can reach their jobs easily. Six economy strategies would help people to meet their basic needs and prepare for the future job market while also shifting more jobs and economic activity to places near housing and transit, with less traffic, throughout the region.

What We Heard: Economy

The overwhelming majority of economy-related comments focused on the negative impacts of inflation and the high cost of living in the Bay Area, followed by low or stagnant wages and the job market, and income inequality. While most residents were focused on immediate economic needs rather than the location of job opportunities, some also expressed that they value shorter commutes; more middle-wage jobs; and a better balance of jobs, housing and transit across the region.

	Theme: Improve Economic Mobility
Theme Description	These three strategies aim to reduce poverty and bolster the middle class by investing in a guaranteed income program and a suite of job training initiatives that prepare Bay Area residents for the future economic landscape. Relatedly, the plan would make targeted investments to ensure that every resident has high-speed internet to take advantage of job and education opportunities.
Strategy Revisions	As the only updated strategy within this theme, Strategy EC2 was modified to center Equity Priority Communities and prioritize key transit hubs as potential locations for job training centers in alignment with Strategy T3 (Improve the Rider Experience through Refined Transfer Timing at Key Regional Hubs).

Economy Strategies: Improve Economic Mobility

EC1: Implement a Statewide Guaranteed Income. Provide an income-based monthly payment to all Bay Area households to improve family stability, promote economic mobility and increase consumer spending.	**$205 Billion**
EC2: Expand Job Training and Incubator Programs. Establish job training and business incubation hubs in Transit-Rich Areas easily accessible to residents of Equity Priority Communities, focusing on areas co-located with jobs in key sectors that are served by major regional transit investments, including Key Regional Hubs.	**$5 Billion**
EC3: Invest in High-Speed Internet in Underserved Low-Income Communities. Provide direct subsidies and construct public infrastructure to ensure all communities have affordable access to high-speed internet.	**$11 Billion**

Theme: Shift the Location of Jobs

Theme Description	Plan Bay Area 2050+ encourages more jobs and economic activity in traditional downtowns and long-standing industrial areas. These three strategies focus on locating jobs in places that strengthen the Bay Area's economy while also prioritizing access to public transit.
Strategy Revisions	Strategy EC4 was expanded to promote a full range of active land uses and to integrate areas subject to MTC's Transit-Oriented Communities Policy, similar to the plan's Housing Element. Strategy EC5 shifted to incentivize employers to locate jobs in areas with low vehicle miles traveled (i.e., areas that require less driving) and key regional transit hubs. Strategy EC5 also now more explicitly identifies policies and incentives to help employers shift in-person jobs to these hubs, emphasizing transit-rich downtowns and main streets throughout the Bay Area. Infrastructure improvement categories in Strategy EC6 were expanded to include renewable energy and building retrofits.

Connecting Homes and Workplaces Through the Transit-Oriented Communities Policy

MTC's Transit-Oriented Communities (TOC) Policy supports financially sustainable, convenient transit and transit-supportive development by establishing minimum standards for local land use, housing and transportation policies near rail stations, ferry terminals and bus rapid transit stops.[9]

The policy supports two high-impact strategies: Strategy EC4: Allow a Greater Mix of Land Uses and Densities in Growth Geographies, and Strategy H3: Allow a Greater Mix of Housing Densities and Types in Growth Geographies. By aligning local planning with these strategies, the TOC Policy encourages a more balanced mix of homes, jobs and services in areas currently served by transit and near planned transit stations. This helps create communities where people of all ages, abilities, income levels and backgrounds can live, work and thrive — making it easier to take transit not just to work but also for daily needs and activities. While the Bay Area is still grappling with post-pandemic effects on commercial vacancy rates and transit ridership levels, the policy looks ahead to a more flexible, resilient land use future — one that creates commercial areas near transit, centers housing growth in transit-rich areas, and supports long-term environmental and mobility goals.

By expanding housing choices and increasing opportunities for jobs and services near major transit hubs, the TOC Policy encourages walkable, mixed-use neighborhoods that reduce car trips, lower greenhouse gas emissions, and support thriving communities.

9. A map of transit stations where the TOC Policy is applicable can be accessed online: https://experience.arcgis.com/experience/01311260043f4bd689907c9df577bfff

Economy Strategies: Shift the Location of Jobs

EC4: Allow a Greater Mix of Land Uses and Densities in Growth Geographies. Allow a greater mix of commercial, civic, cultural, and other active land uses in select Priority Development Areas and Transit-Rich Areas to revitalize downtowns and main streets, and to support transit recovery.	**<$1 Billion**
EC5: Provide Incentives to Employers to Locate in Low-VMT Areas. Provide targeted investments and incentives to encourage employers that offer middle-wage, in-person jobs to locate in low-VMT areas, prioritizing those that are transit-rich and/or housing-rich, including Key Regional Hubs.	**$20 Billion**
EC6: Retain and Invest in Key Industrial Lands. Implement local land use policies to protect key industrial lands, identified as Priority Production Areas, while funding key infrastructure improvements in these areas.	**$5 Billion**

Photo: City of Benicia

Industrial Lands as a Foundation for Regional Prosperity and Sustainability

The Bay Area's industrial lands support a diverse range of industries that power the regional economy. Strategy EC6: Retain and Invest in Key Industrial Lands supports these districts of advanced manufacturing, research and development, logistics, and traditional production, which create accessible, middle-wage jobs across sectors. Far more than isolated work zones, industrial lands function as interconnected nodes within a broader regional ecosystem, contributing to economic resilience and shared prosperity. Industrial lands also play a strategic role in supporting broader state climate goals. By enabling local production and shorter supply chains, these areas reduce reliance on long-haul shipping, lower greenhouse gas emissions and support more sustainable goods movement.

To strengthen and future-proof these assets, the plan's Growth Geographies include Priority Production Areas. These locally nominated industrial districts are already well-integrated with the regional goods movement network. Local governments prioritize Priority Production Areas for targeted economic development and protect them from incompatible land uses. To connect planning to real-world implementation, MTC and ABAG's Priority Production Area Pilot Program has provided $2 million in funding to advance a range of efforts from analyzing critical infrastructure needs to exploring design standards and financing strategies for industrial growth.

Environment Element

Element Description

Nine environment strategies work not just to protect the Bay Area's land, air, water and people from natural hazards, but also to proactively improve residents' health and enhance their living spaces. First, strategies focus on the effects of sea level rise, earthquakes, wildfire and other natural hazards to make Bay Area communities more resilient to climate change. These strategies also promote accessibility upgrades for homes and improve access to parks and open spaces, supporting a healthier, more equitable region for people of all ages and abilities. Finally, the link between transportation and environmental quality is explored in strategies that reduce greenhouse gas emissions from passenger vehicles.

What We Heard: Environment

People expressed anxiety and fear about climate change, pollution and future generations' environmental conditions. Amidst a sense of frustration regarding climate policy that fails to meet the moment, residents also called for more investment in adaptation planning and preparation for intensifying climate disruptions. Since the start of the pandemic, people have also wanted more open spaces near their homes.

	Theme: Reduce Risks from Hazards
Theme Description	These strategies identify adaptation measures for sea level rise, climate change and other natural hazards, investing in critical improvements that make Bay Area communities safer and more environmentally resilient.
Strategy Revisions	Strategy EN1 was changed to incorporate sea level rise adaptation project details provided by local jurisdictions, and its price tag was raised to reflect protection for up to 4.9 feet, compared to the previous plan's 3 feet. Strategy EN2 was expanded to include accessibility improvements to existing residences. Strategy EN3 was also updated, increasing in scale to decarbonize all buildings rather than just residential structures.

Environment Strategies: Reduce Risks from Hazard

EN1: Adapt to Sea Level Rise. Adapt shoreline communities, infrastructure, and ecosystems affected by sea level rise.	**$96 Billion**
EN2: Provide Means-Based Financial Support for Seismic, Wildfire, and Accessibility Home Retrofits. Adopt building ordinances and incentivize retrofits to existing residential buildings to meet higher seismic, wildfire, and ADA accessibility standards, providing means-based subsidies to offset associated costs.	**$9 Billion**
EN3: Provide Means-Based Financial Support for Energy Decarbonization and Water Efficiency Upgrades in All Buildings. Provide financial support to reduce barriers to the conversion of Bay Area buildings to electric, energy efficient, and water efficient properties.	**$52 Billion**

> ***MAP 4-7** highlights planned infrastructure projects that aim to safeguard communities from sea level rise throughout the Bay Area. Shoreline areas are prioritized for protection and restoration under Strategy EN1: Adapt to Sea Level Rise.*

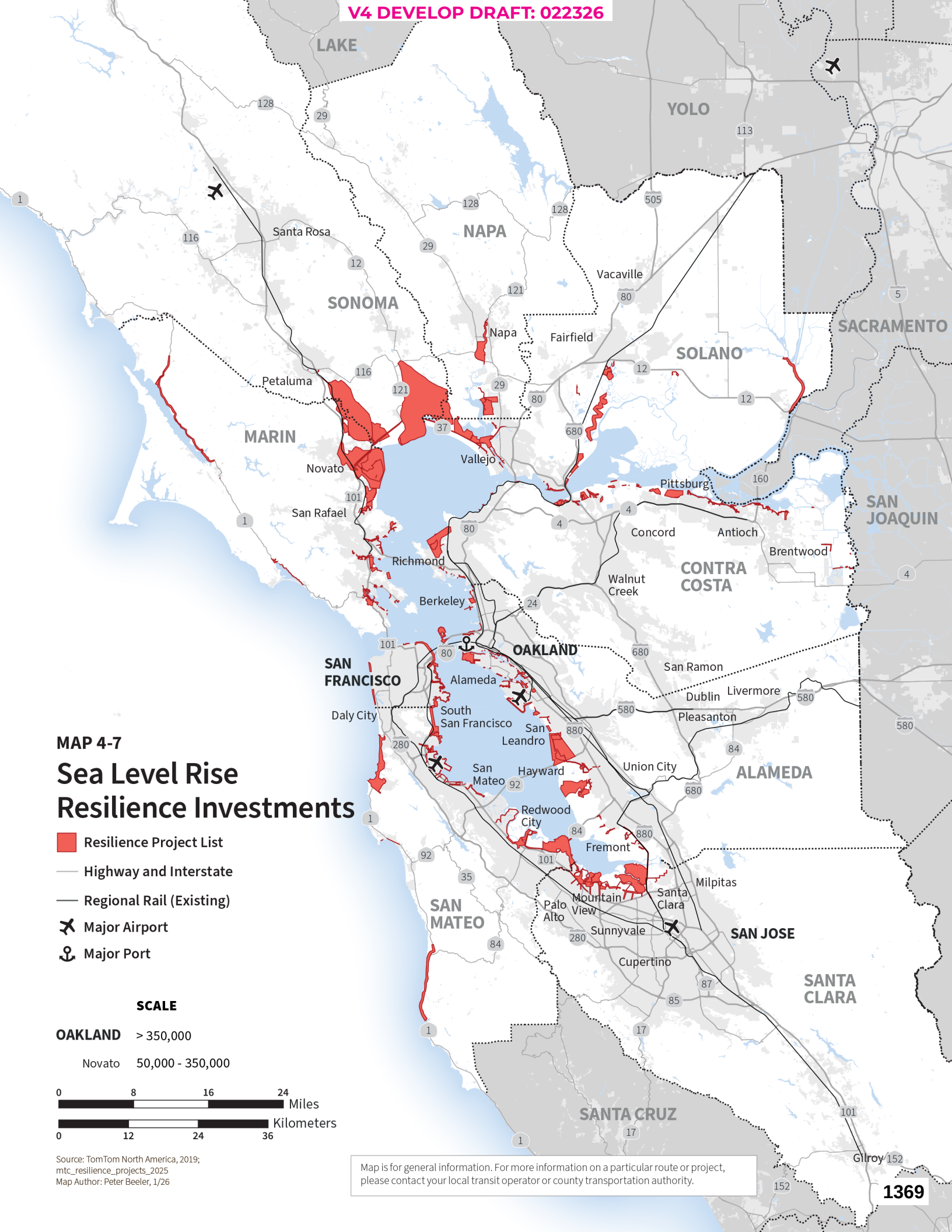

LAKE
YOLO
NAPA
SONOMA
SACRAMENTO
SOLANO
MARIN
CONTRA COSTA
SAN JOAQUIN
ALAMEDA
SAN MATEO
SANTA CLARA
SAN JOSE
SANTA CRUZ
SAN FRANCISCO
OAKLAND
Santa Rosa
Petaluma
Novato
San Rafael
Napa
Vacaville
Fairfield
Vallejo
Pittsburg
Concord
Antioch
Brentwood
Walnut Creek
Richmond
Berkeley
Alameda
Daly City
South San Francisco
San Leandro
San Mateo
Hayward
Union City
Redwood City
Fremont
San Ramon
Dublin
Livermore
Pleasanton
Milpitas
Mountain View
Palo Alto
Sunnyvale
Santa Clara
Cupertino
Gilroy
MAP 4-7
Sea Level Rise Resilience Investments
Resilience Project List
Highway and Interstate
Regional Rail (Existing)
Major Airport
Major Port
SCALE
OAKLAND > 350,000
Novato 50,000 - 350,000
0 8 16 24 Miles
0 12 24 36 Kilometers
Source: TomTom North America, 2019; mtc_resilience_projects_2025
Map Author: Peter Beeler, 1/26
Map is for general information. For more information on a particular route or project, please contact your local transit operator or county transportation authority.

Photo: Noah Berger

Regional Sea Level Rise Coordination and Resilience Project List

Sea level rise adaptation in the Bay Area will require a vivid reimagining of residents' relationship with the Bay, the Pacific Coast and the Delta. MTC, ABAG and the San Francisco Estuary Partnership (which is housed within MTC and ABAG) work with the San Francisco Bay Conservation and Development Commission (BCDC), the California Coastal Commission, the State Coastal Conservancy, and the Delta Conservancy to address regional environmental issues explored by Strategy EN1: Adapt to Sea Level Rise. This strategy and the Resilience Project List nested within it represent two important products of this collaboration, and together they envision a Bay Area that can adapt to one of the most serious climate threats facing the region.

The Resilience Project List catalogs projects that adapt the nine-county Bay Area shoreline to sea level rise in the decades ahead. The list includes the specific scope of proposed adaptation work as well as the current status, expected timeline, counties affected and estimated cost for each project. Locally developed projects account for over 50% of projects on the list, and the projects are divided into two bins according to the expected amount of sea level rise and timeline. It also includes placeholder projects to recognize adaptation needs for segments of shoreline that have not yet planned for sea level rise.

Another recent collaborative effort is the Regional Shoreline Adaptation Plan, developed as a result of Senate Bill 272 (Laird, 2023), which required BCDC to create guidelines for local governments to follow when planning for the impacts of sea level rise along the San Francisco Bay shoreline. The plan aims to provide coordinated, actionable steps for the Bay Area to adapt to rising seas and ensure the long-term resilience of its communities, infrastructure and ecosystems, including setting a deadline of 2034 for local governments to submit their own sea level rise plans to BCDC.

Adapting successfully to an uncertain future will require significant funding — funding that is limited in the years ahead. Unlike the Transportation Project List, the Resilience Project List is fiscally unconstrained, meaning that it can be more expansive in its projects and recommendations without being limited by projected revenues from specific, anticipated sources. In addition to this aspirational list, however, regional leaders also have been realistically assessing what financial resources would be needed to protect the Bay Area from climate threats. Building on the work of the Sea Level Rise Adaptation Funding and Investment Framework (2023), Plan Bay Area 2050+ updated the region's estimated funding need to $96 billion, with only $6 billion forecasted via existing programs.

While the number is large, lawmakers, voters and government agencies have made promising commitments to adaptation work. Statewide, a $10 billion climate bond passed in 2024 to support environmental, energy and water projects, and there remains potential for federal investments in this space.

Photo: Noah Berger

Powering Progress: BayREN's Role in a Healthier, Greener Bay Area

As a coalition of the region's nine counties, the Bay Area Regional Energy Network (BayREN) helps homeowners, renters, small businesses and cities make essential energy-reducing, emissions-lowering building upgrades. As of spring 2025, BayREN has improved over 76,000 homes and businesses, distributed more than $88 million in incentives, and helped the Bay Area avoid over 166 million tons of carbon emissions. This work furthers Strategy EN3 to reduce the carbon footprint of existing buildings and offers a roadmap of how to decarbonize as building components reach the end of their useful life.

BayREN prioritizes support for moderate-income households, renters and small businesses with aging infrastructure while helping local governments achieve their climate goals. BayREN also supports local governments through tools and services such as the Existing Buildings Dashboard and Bay Area Energy Atlas, which provide public, countywide energy use data to guide decarbonization strategies and foster regional collaboration.[10] BayREN also now offers three key services:

- **Energy Concierge:** Expert tailored support to help local governments and special districts in the nine Bay Area counties navigate the complex world of energy programs, including funding and financing.
- **Energy Roadmapping:** Technical and engineering support to create energy roadmaps for public buildings and Community Resilience Centers.
- **Decarbonization Showcase:** A select group of public buildings are receiving hands-on support to implement real-world decarbonization strategies and serve as models for others.

10. The BayREN Existing Buildings Dashboard can be accessed online: https://bayren-existing-buildings.mtcanalytics.org/
The Bay Area Energy Atlas can be accessed online: https://bayarea.energyatlas.ucla.edu/

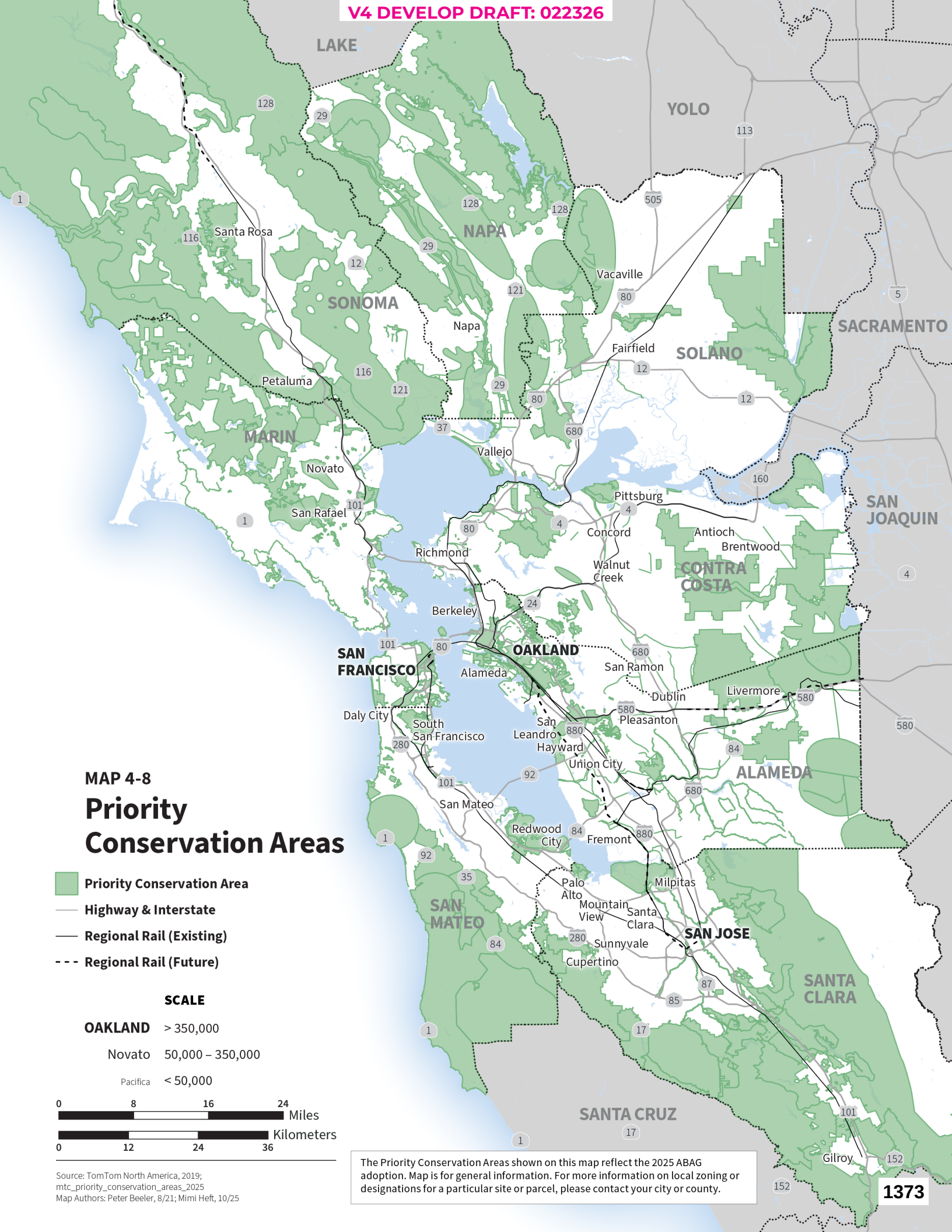
Theme: Expand Access to Parks and Open Space

Theme Description	These three strategies work together to protect existing agricultural and natural lands and enhance urban parks and open spaces accessible to all residents, from ecosystem-critical conservation lands to community-building gathering spaces like parks, trails and city recreation facilities.
Strategy Revisions	Since the last plan, Strategy EN6 was modified to specifically focus on urban greening efforts, with a $7 billion increase for new urban park development. This modification ensures that access to urban parks in Equity Priority Communities and other disadvantaged areas is maintained, even as the region's population is projected to grow. Finally, the strategy description also now incorporates Americans with Disabilities Act standards for all new and upgraded parks.

Environment Strategies: Expand Access to Parks and Open Space

EN4: Maintain Urban Growth Boundaries. Use urban growth boundaries to focus new development within the existing urban footprint or areas otherwise suitable for growth, as established by local jurisdictions.	**<$1 Billion**
EN5: Protect and Manage High-Value Conservation Lands. Protect and preserve high-priority natural and working lands, improving the resilience and connectivity of the region's biodiversity and the sustainability and vibrance of the agricultural sector.	**$35 Billion**
EN6: Expand Urban Greening in Communities. Invest in quality parks, trails, tree canopy, and urban greening, providing recreation opportunities for people from all backgrounds, abilities, and ages to enjoy.	**$27 Billion**

> ***Map 4-8 highlights locations that cities and counties have nominated to be protected and improved as Priority Conservation Areas, thanks to their regional significance. These areas include parks, farmlands, open space and natural habitats.***



MAP 4-8

Priority Conservation Areas

- Priority Conservation Area
- Highway & Interstate
- Regional Rail (Existing)
- Regional Rail (Future)

SCALE

OAKLAND	> 350,000
Novato	50,000 – 350,000
Pacifica	< 50,000

0 8 16 24 Miles

0 12 24 36 Kilometers

Source: TomTom North America, 2019; mtc_priority_conservation_areas_2025
Map Authors: Peter Beeler, 8/21; Mimi Heft, 10/25

The Priority Conservation Areas shown on this map reflect the 2025 ABAG adoption. Map is for general information. For more information on local zoning or designations for a particular site or parcel, please contact your city or county.

Theme: Reduce Climate Emissions

Theme Description	Climate strategies and transportation strategies work hand in hand. Under these three strategies, clean vehicle initiatives would help people purchase and power more environmentally friendly cars; transportation demand management initiatives would encourage Bay Area residents to drive less; and employers would expand commute trip reduction programs to encourage their workers to drive less.
Strategy Revisions	Strategy EN8 was expanded to include e-bike incentives and reflect the latest state estimates for electric vehicle charger demand, while the transportation demand management strategy clarifies that shared mobility options will be prioritized for co-location at mobility hubs. The parking pricing components of transportation demand management, previously included in Strategy EN9, have been shifted to Strategy T5, which now integrates all pricing-related initiatives in Plan Bay Area 2050+.

Environment Strategies: Reduce Climate Emissions

EN7: Expand Commute Trip Reduction Programs at Major Employers. Set a sustainable commute target for major employers as part of an expanded Bay Area Commuter Benefits Program, with employers responsible for funding incentives and disincentives to shift auto commuters to any combination of work-from-home, transit, walking and/or bicycling.	**<$1 Billion**
EN8: Expand Clean Vehicle Initiatives. Expand investments in clean vehicles, including electric vehicles and electric mobility options, and charging infrastructure subsidies, to accelerate the transition from conventional vehicles.	**$8 Billion**
EN9: Expand Transportation Demand Management Initiatives. Expand investments in transportation demand management programs to reduce driving demand and encourage active and shared transportation choices, such as vanpools, bikeshare, carshare and transit.	**$2 Billion**

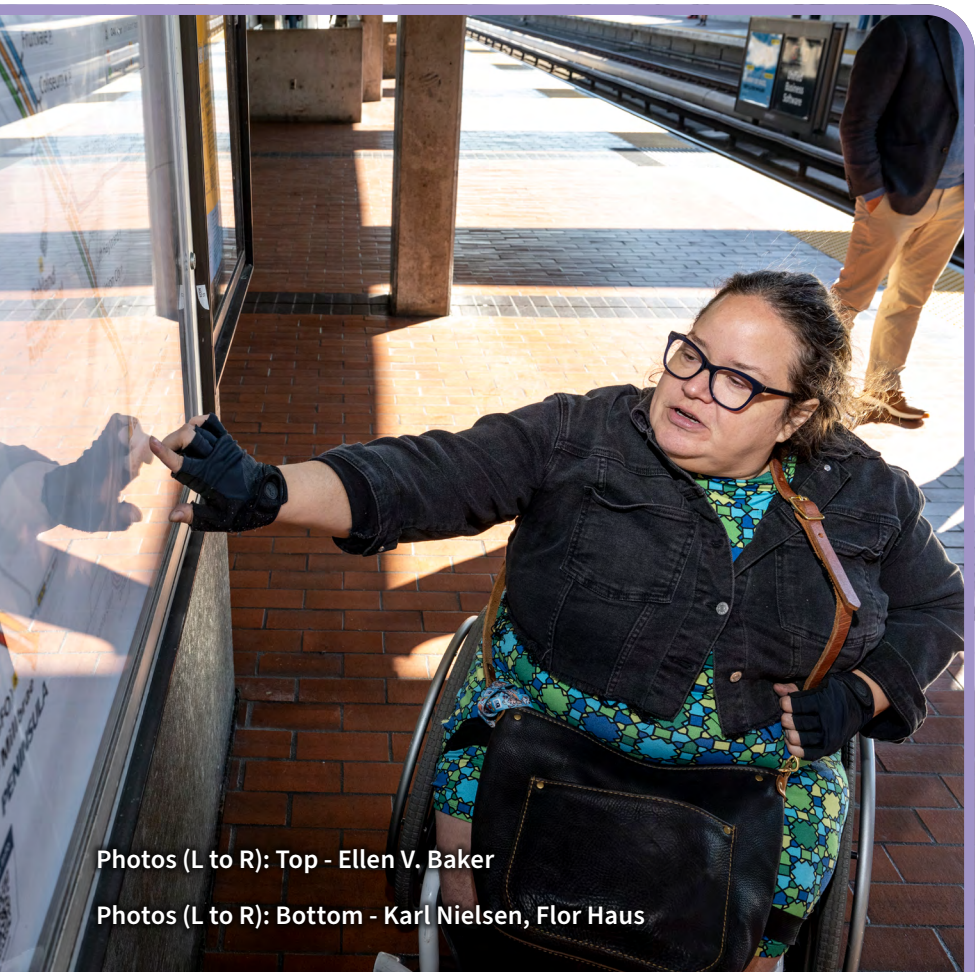
Photo: Ellen V. Baker

Transportation Electrification for a Healthier Bay Area

Transportation electrification represents a shift in how we power our transportation options, changing the energy source from fossil fuels to electricity. A suite of MTC transportation electrification initiatives offers grant funding and direct technical assistance to local agencies looking to invest in electrification. Offerings range from awarding capital grants to installing public charging stations for electric vehicles (EVs) and micromobility options like electric bikes or scooters. MTC also offers planning assistance to transition public fleets to zero-emission vehicles and to expand electric bikeshare systems. As of spring 2025, MTC has invested $65 million into transportation electrification initiatives, with over 50 public agencies receiving MTC assistance.

Electrification initiatives advance Strategy EN8 to help towns, cities and counties transition to clean vehicles. Strategy EN8 includes incentives that replace over 800,000 gas vehicles with EVs and increase e-bike ridership. The strategy also invests in 250,000 EV charging ports across the region to narrow the gap in inequitable charging infrastructure availability between neighborhoods. Strategy EN8 plays a crucial role in accelerating the Bay Area's transition to EVs ahead of the state goal to transition to zero-emission vehicles by 2035. Together, these initiatives account for more than one-third of all climate emissions reductions in the plan and help to achieve the Bay Area's state-mandated 19% per capita GHG emissions reduction target by 2035.

5 | Improving Outcomes



Photos (L to R): Top - Ellen V. Baker

Photos (L to R): Bottom - Karl Nielsen, Flor Haus

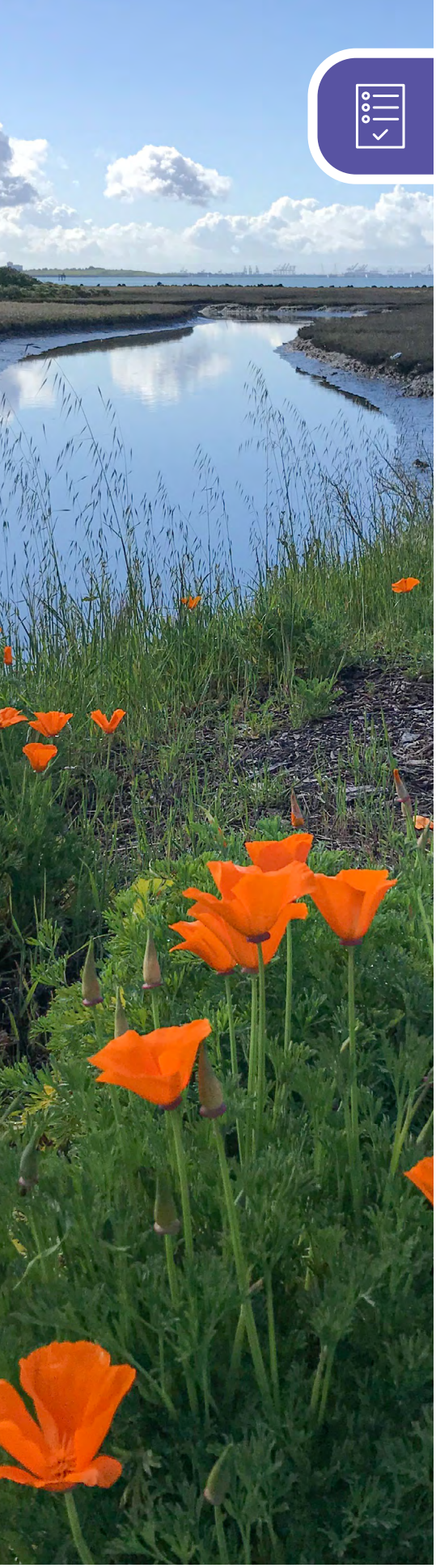


Photo: Ben Botkin

Equity and Performance Under Plan Bay Area 2050+

This chapter explores how Plan Bay Area 2050+ strategies could improve life in the Bay Area by 2050, including where jobs and housing are anticipated to grow across the region. Using the five guiding principles — affordable, connected, diverse, healthy and vibrant — as a framework, select plan outcomes across the four elements show how the 35 strategies together could benefit Bay Area residents, especially residents with low incomes and those living in Equity Priority Communities. For a deeper discussion of the full performance outcomes and equity implications, please refer to the Plan Bay Area 2050+ Performance and Equity Analysis Reports.

Photo: Karl Nielsen

Focusing Bay Area Growth Through 2050

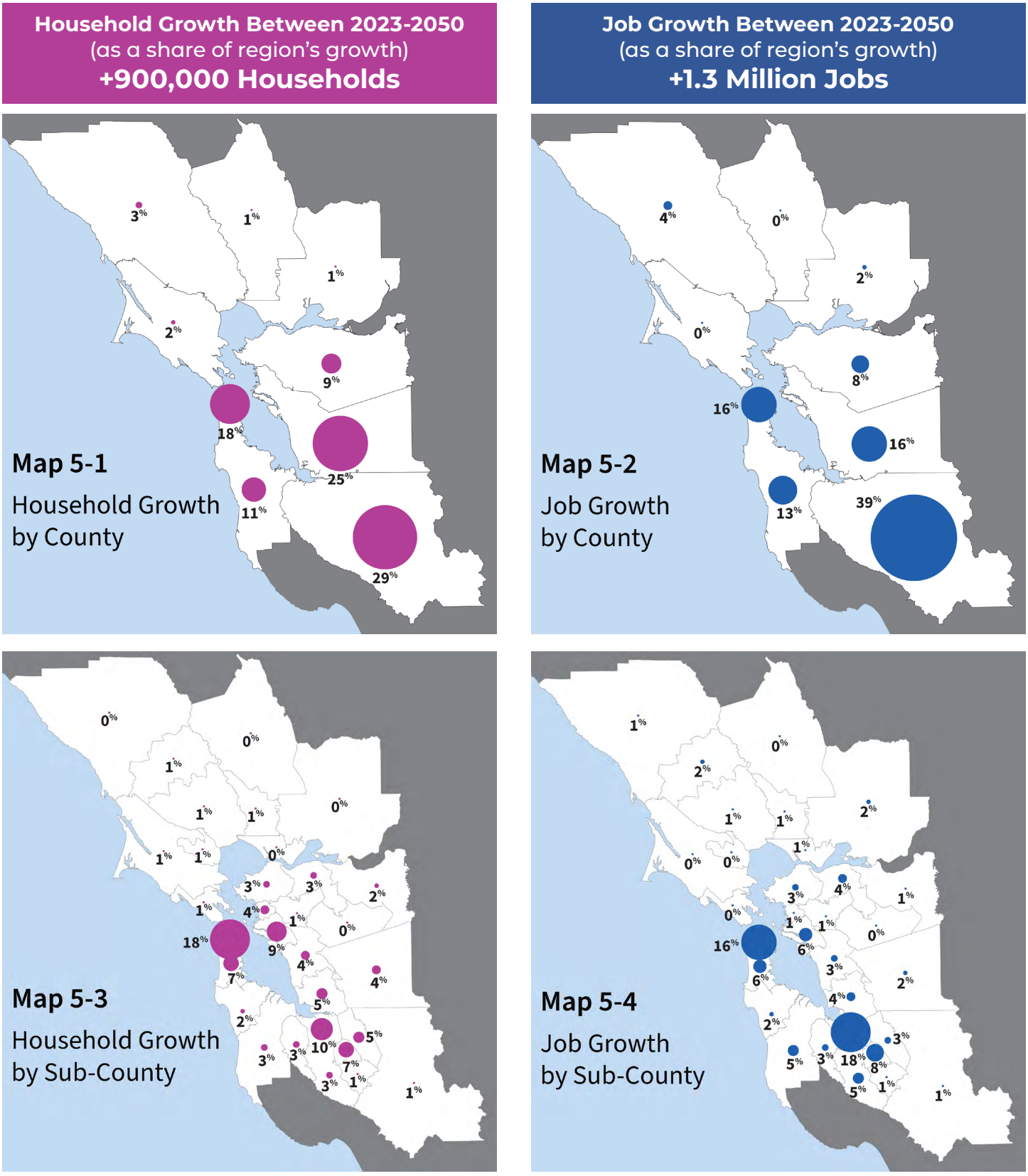
In 2020, after decades of steady growth, the Bay Area experienced a dip in the overall number of both people and jobs regionwide as the COVID-19 pandemic hit. These numbers continue to fluctuate in 2025, but this plan assumes a strong recovered regional economy by 2050, even though near-term economic volatility related to pandemic recovery indicates slower near-term economic growth.

By 2050, MTC and ABAG's Regional Growth Forecast predicts about 1.3 million new jobs and more than 900,000 new households in the Bay Area between 2023 and 2050. Growth under plan strategies would be concentrated in Growth Geographies that are close to transit and other resources. Ninety-six percent of new Bay Area households and over 70% of new jobs are anticipated to be in Growth Geographies throughout the region if all strategies are implemented, with nearly all growth happening within today's urban growth boundaries.[1]

The vast majority of growth is anticipated in the South Bay, the East Bay, San Francisco and the Peninsula, with the North Bay seeing more modest growth in both households and jobs. High office vacancies within high-growth industries in these areas (especially the South Bay) will allow more jobs in existing spaces, while areas with strong housing markets may see more residential development near transit, rather than new commercial development. Work-from-home trends are expected to be similar to today, with roughly one in four jobs home-based in 2050.

1. Growth Geographies include Priority Development Areas, Priority Production Areas, High-Resource Areas and Transit-Rich Areas. See Chapter 4 to learn more about these areas.

Figure 5-1. Household and Job Growth by County and Sub-County



NOTE: Plan Bay Area 2050+ divides the nine-county Bay Area into 34 sub-county areas, called superdistricts. Superdistricts are combinations of cities, towns and unincorporated areas that allow the public to see the more localized growth pattern in Plan Bay Area 2050+. Superdistricts within San Francisco have been combined to show the total city share. More information on the superdistricts can be found in the layer documentation.[2]

2. Layer documentation for superdistricts can be found at https://opendata.mtc.ca.gov/datasets/travel-model-super-districts

Equity Priority Communities: Focusing and Refining Equity Efforts

What Are Equity Priority Communities?

By identifying which Bay Area communities are socially or economically disadvantaged, MTC and ABAG can direct funding toward projects and programs that enable more equitable access to transportation, housing and more. Equity Priority Communities (EPCs) are U.S. Census tracts that have a significant concentration of disadvantaged populations, such as households with low incomes and people of color, among other factors.

MTC Equity Priority Community Disadvantage Factors

Low Income

People of Color

People With Disabilities

Limited English Proficiency

Zero-Vehicle Household

Seniors 75 Years and Over

Single-Parent Family

Severely Rent-Burdened Household

MTC and ABAG used two sets of data from the American Community Survey to identify areas with large numbers of residents affected by these factors. The first set reflects conditions before the COVID-19 pandemic (2014–18), while the second captures more recent changes (2018–22), including impacts from the pandemic. Across both sets of data, about one in five census tracts continue to qualify as EPCs. By using both sets of data, Plan Bay Area 2050+ can rely on the most up-to-date information for planning decisions, as required by state and federal guidelines, while still integrating geographic areas identified in the previous long-range plan (Plan Bay Area 2050).

Why Does This Matter for Planning?

Equity Priority Communities play a major role in guiding transportation, housing and environmental investments across the Bay Area. Equity Priority Community status can influence access to transportation and housing grants at both the regional and state levels, including programs like the One Bay Area Grant Program, the State Active Transportation Program and others. MTC and ABAG, in partnership with the Policy Advisory Council, also are looking at ways to better align funding with the needs of disadvantaged communities over the next few years and engage with these communities directly while exploring new data tools and planning frameworks.

Photo: Joey Kotfica

Planning for Accessible Futures

How Does This Plan Work Toward Equity?

Equitable access to housing, transportation, open space and emergency services are essential to a more inclusive Bay Area. Plan strategies prioritize accessibility and inclusion for all, and if implemented, Plan Bay Area 2050+ could reduce housing and transportation cost burdens, increase the share of affordable housing, and improve access to jobs and services for all people in the Bay Area. Low-income households, where people with disabilities are unfortunately overrepresented as a share of the population, would benefit from plan strategies that address affordability and accessibility.

The plan prioritizes building and preserving affordable, accessible housing through strategies like Strategy H4, which aims to build enough affordable housing to ensure homes for all; and Strategy EN2, which provides means-based retrofits for seismic, wildfire and accessibility needs. Transportation strategies include significant investments in both fixed-route and paratransit services, including one-seat ride pilots and Americans with Disabilities Act integration with Next Generation Clipper. Strategy T9 ensures that sidewalks, streets and trails suit all ages and abilities, while strategies that improve transit frequency and coverage would increase regional mobility, particularly for transit-dependent people. The plan also expands access to parks for people of all abilities via urban greening in Strategy EN6 and promotes economic mobility through job training opportunities (Strategy EC2) and a statewide guaranteed income (Strategy EC1).

Beyond This Plan: Accessible Futures Conference

On June 16-17, 2025, MTC and ABAG hosted Accessible Futures: Sharing. Listening. Learning., a regional conference bringing together the Bay Area disability community to address unmet needs and policy gaps in transportation, housing, the environment and other key areas that overlap with Plan Bay Area 2050+. The event aimed to build a strong regional network of advocates and organizations, create a conference report to guide future action, and foster collaboration among participants. Attendees engaged with leaders and policymakers, shared lived experiences, and explored opportunities for future partnerships in a fully accessible setting.

Photo: Ellen V. Baker

Outcomes by Guiding Principle

This plan's strategies encourage housing production, faster commutes, thriving downtowns and open spaces to enjoy nature. They advocate for protection from hazards, economic prosperity and secure housing for those most in need, with better connections to each other through the Bay Area's system of transit, roads and trails. Overall, if implemented, this plan would succeed at making the Bay Area more affordable, connected, diverse, healthy and vibrant along several cross-cutting metrics.

Figure 5-2 shows select outcomes by guiding principle with and without plan strategies in place. Arrows indicate whether the Bay Area would be on a better (upward arrow), worse (downward arrow) or mixed (crossing arrows) trajectory for each goal.

Figure 5-2. Outcome Trajectories by Guiding Principle

Guiding Principle	Performance Measure	Outcomes Without Plan Bay Area 2050+	Plan Bay Area 2050+ Outcomes
Affordable	Housing and Transportation Affordabillity	⤮	↗
	Affordable Housing Production and Preservation	⤮	↗
Connected	Improved Access to Destinations	⤮	↗
	Reliable Transportation System	↘	↗
Diverse	Inclusive Communities	⤮	↗
	Ability to Remain in Place	⤮	⤮
Healthy	Health and Safety for Residents	↘	↗
	Health and Safety for the Environment	⤮	↗
Vibrant	Thriving Economy	↗	↗
	Downtown Recovery	—	↗

↗ Outcomes in positive direction

↘ Outcomes in negative direction

⤮ Mixed outcomes

— Limited data and/or unknown outcomes

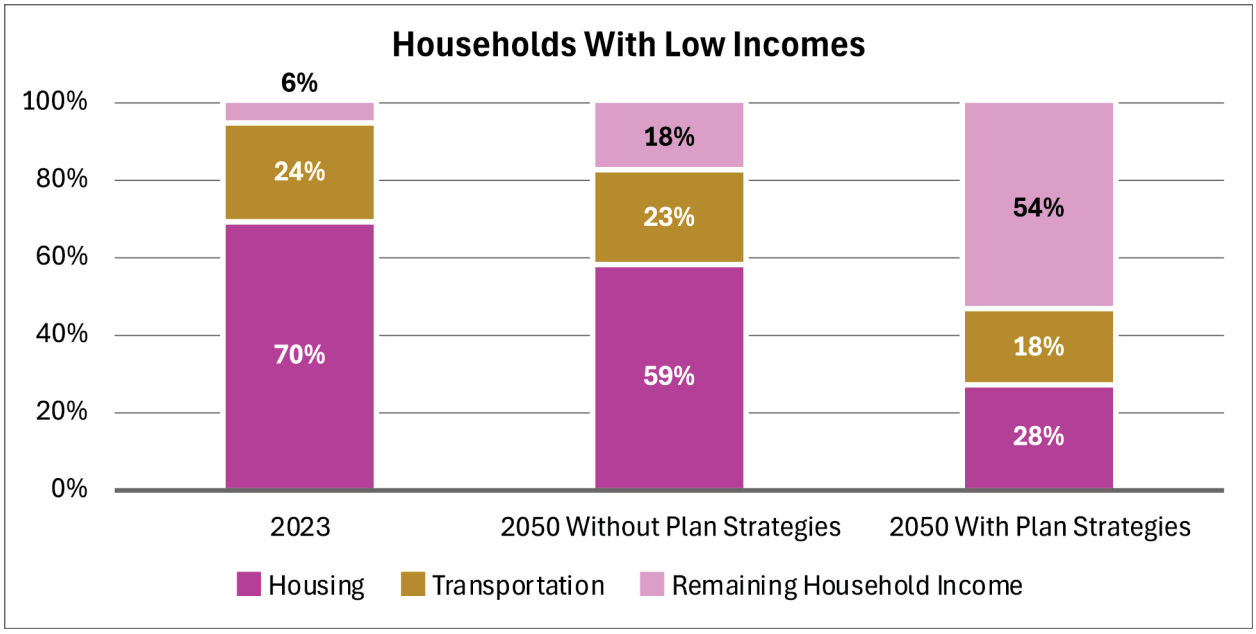
Improving Affordable Outcomes

Despite its wealth of attractions, the Bay Area is also known for being one of the most expensive places to live in the world. Many households with low and even moderate incomes struggle to find adequate housing in their preferred locations across the Bay Area, and transportation costs rise as people seek housing further from urban cores and jobs. In 2023, households with low incomes were spending about 94% of their incomes just on housing and transportation combined.

Transportation and housing costs for all households could decrease by 2050 under plan strategies, and households with low incomes would benefit most. The share of deed-restricted affordable housing regionwide could increase by seven times under strategies that protect and produce affordable housing. Households with low incomes would see reductions in transportation costs thanks to expanded income-based discount programs for tolls and transit fares.

Figure 5-3 shows the share of income spent on housing and transportation costs in 2023 and the projections of these costs in 2050 with and without plan strategies, first for households with low incomes and then for all households. Without the plan, households with low incomes could spend 82% of their incomes on combined housing and transportation costs in 2050, but the plan could reduce those costs to 46%.

Figure 5-3. Share of Income Spent on Housing and Transportation Costs



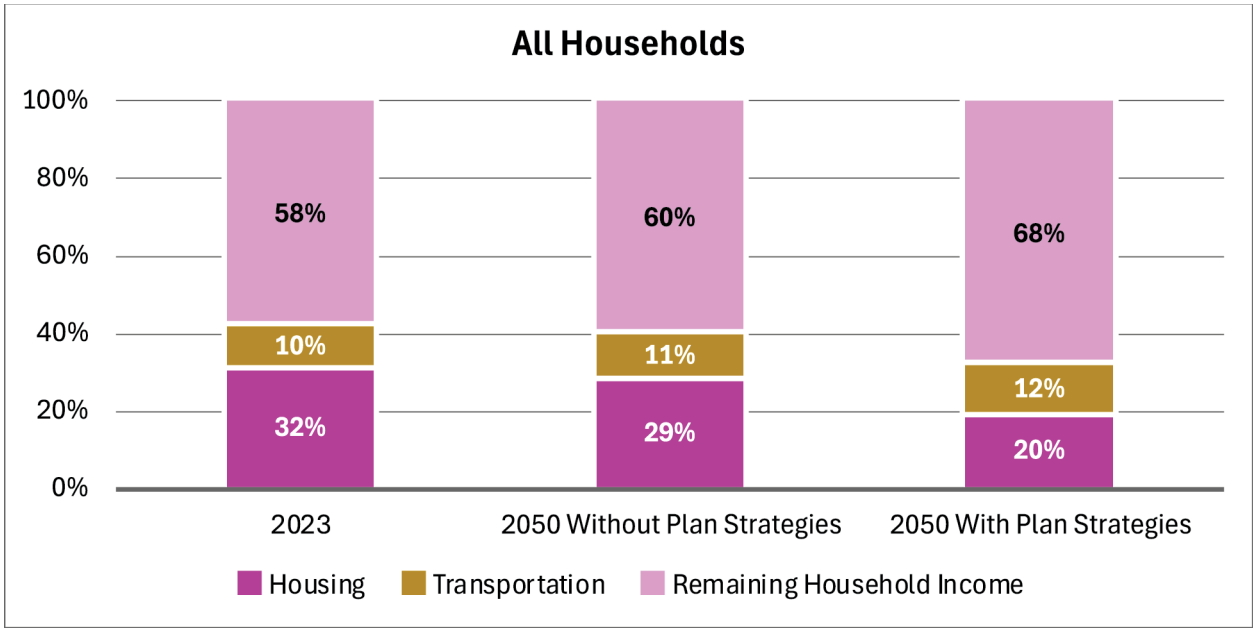


Photo: Karl Nielsen

Improving Connected Outcomes

In addition to high housing costs, Bay Area residents are struggling with congested freeways, inequitable access to transit and auto-oriented lifestyles that affect health. Even as transit systems struggle financially, residents still want to see better, more frequent transit service and more active routes that allow them to enjoy the beauty and great weather of the region.

Plan Bay Area 2050+ transportation strategies, paired with the plan's land use strategies, envision a fully funded transit system that improves access, mobility and more types of travel for all residents. Specific strategies emphasize access and connections to transit, and the plan's overarching growth strategy that locates housing near transit further promotes residents' first- and last-mile transit connections. By 2050, the share of people commuting via transit, biking or walking is projected to more than double under strategies that invest in transit and active transportation, coupled with pricing strategies to manage driving demand. The Bay Area could also more than double its share of jobs easily accessible via transit, biking or walking under the strategies. Without the plan in place, 56% of Bay Area commuters are likely to drive to work, whereas the plan could reduce that number to 48%, with 23% of commuters taking transit, walking or biking.

Figure 5-4 shows the share of Bay Area commuters driving; taking transit, biking or walking; and working from home for 2023, for 2050 without the plan, and for 2050 with the plan strategies in place.

Figure 5-4. Commute Mode Share

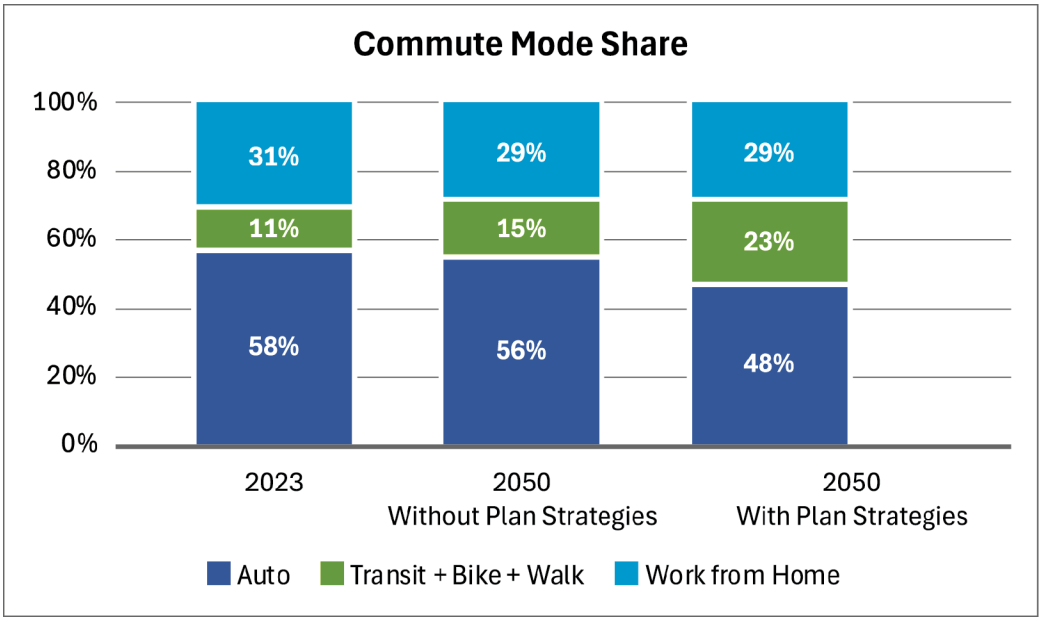


Photo: Karl Nielsen

Nearly two-thirds of all Bay Area households — and the vast majority of its low-income households — could be located within a half-mile of frequent transit by 2050, thanks to strategies that expand transit service and promote both affordable and market-rate housing at a range of densities. Malls, offices and publicly owned lands could be transformed into mixed-income neighborhoods with plentiful transit — a stark contrast to the future without the plan, in which less than half of all households could access transit within a half-mile of their homes.

Figure 5-5 highlights the increase in households within a half-mile of transit between 2023 and 2050, both with and without plan strategies in place. Without the plan, just 54% of low-income households would be within a half-mile to transit. With the plan, this rate rises to 83%. Gains are more modest for all households with nearly 62% of all households near transit.

Figure 5-5. Households Within One-Half Mile of High-Quality Transit

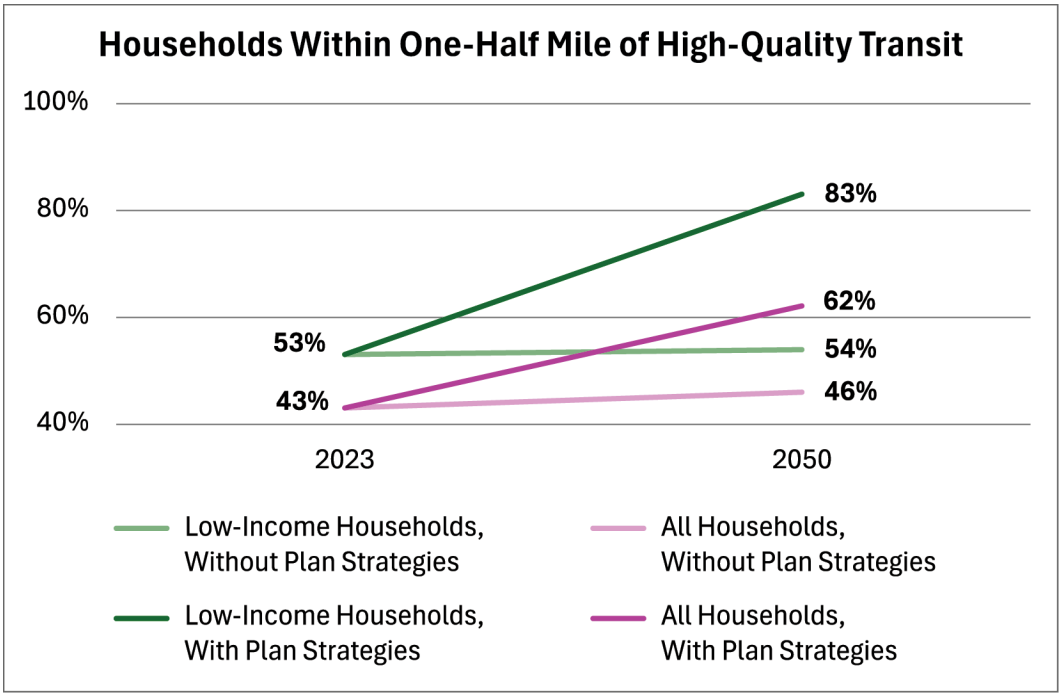


Photo: iStock, People Images

Improving Diverse Outcomes

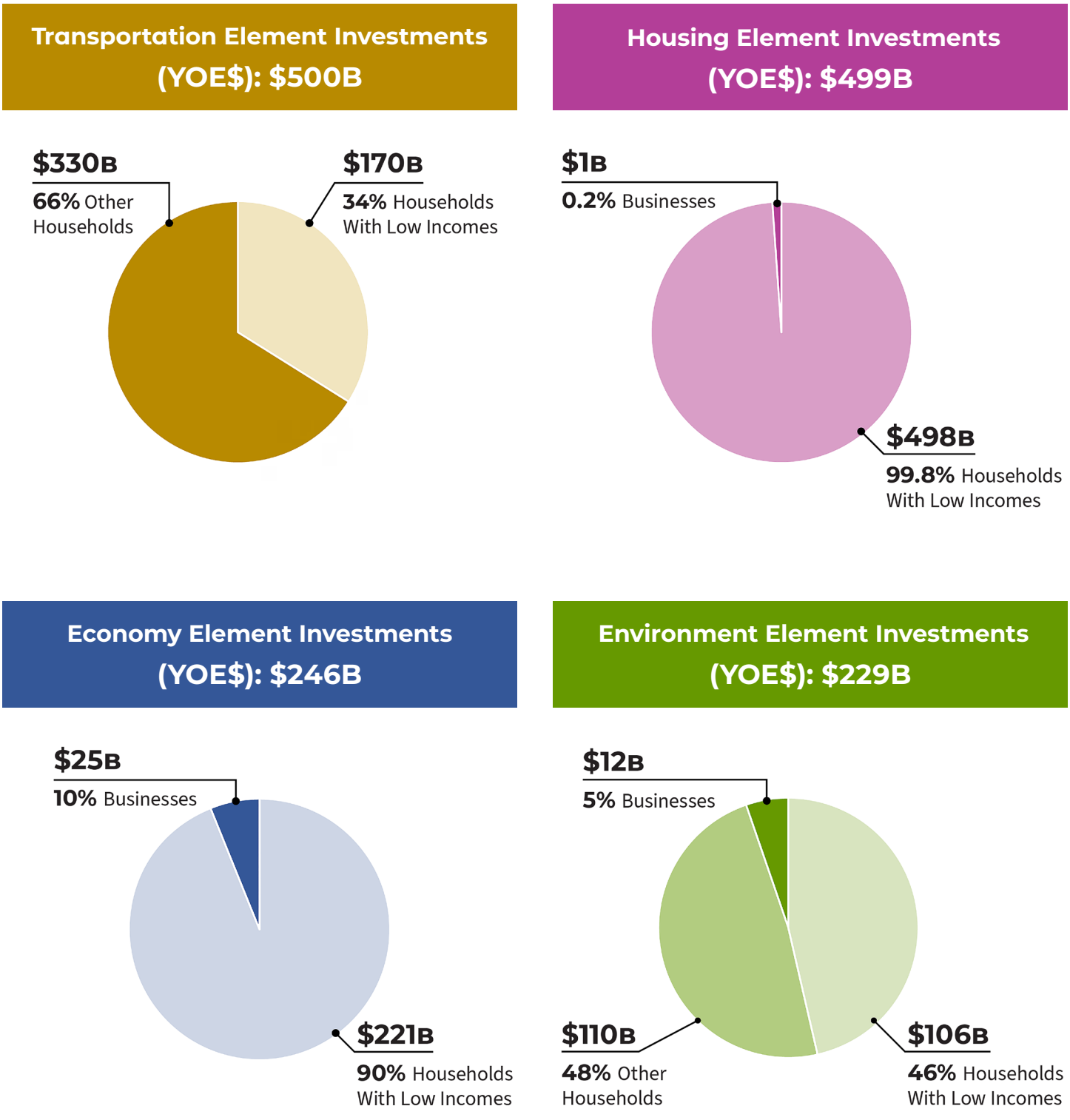
Unaffordability and income inequality threaten the diversity of the Bay Area as longtime residents are pushed out. Access to resources is uneven throughout the region, with some neighborhoods experiencing displacement and gentrification while others are struggling to attract new residents.

To advance equity, this plan directs investments both toward households with low incomes (roughly a quarter of all Bay Area households) and Equity Priority Communities. In 2050, low-income households could access many more housing choices around the Bay Area than today, improving the region's inclusivity by making homeownership more feasible for households with low incomes. Affordable housing initiatives in affluent neighborhoods and Transit-Rich Areas also could improve opportunities for those with limited financial means.

The plan could achieve a 11% increase in the homeownership rate for low-income households, providing vital intergenerational wealth-building opportunities. This growth is driven by strategies aimed at addressing systemic injustices and inequalities that have historically limited housing access and homeownership, particularly for communities of color. Without these strategies in place, homeownership rates for low-income households will remain stagnant, with no projected change between 2023 and 2050.

Figure 5-6 shows what percentage and dollar figure of Plan Bay Area 2050+ investment would go toward households with low incomes, for each element.

Figure 5-6. Equitable Investments Across Plan Bay Area 2050+ Elements (Year of Estimate Dollars)



NOTE: *Existing economic development revenues not inventoried. $11 billion in transportation revenues are assigned to support select Environment Element strategies. Numbers may not sum due to rounding.*

Photo: Karl Nielsen

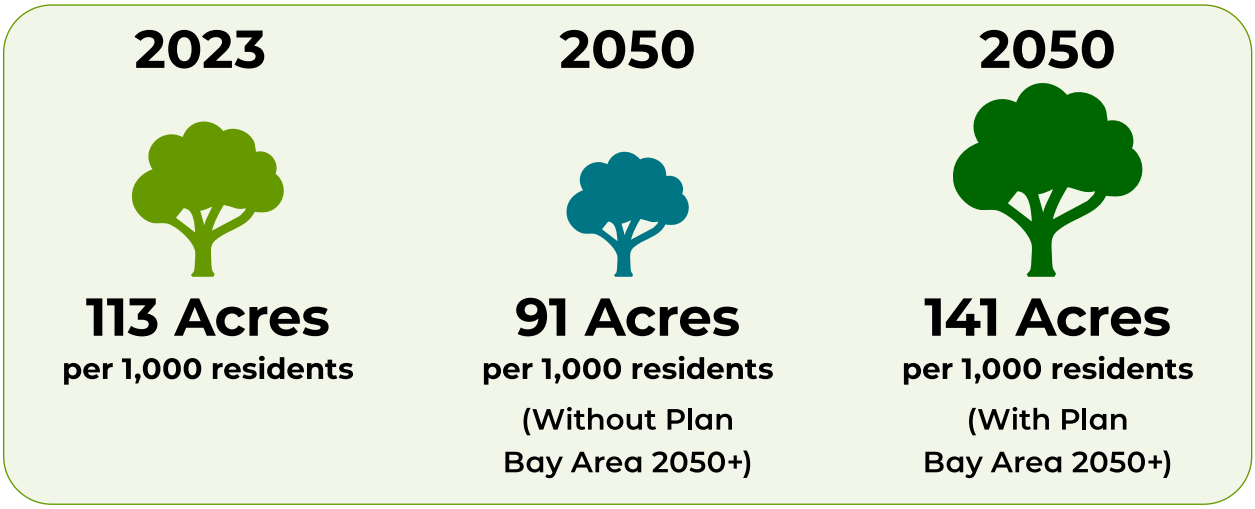
Improving Healthy Outcomes

Though the Bay Area is known for its beauty and open spaces, most residents need a car to fully access opportunities around the Bay, and not all neighborhoods have quality parks or other green spaces. Car dependence can harm health through crashes and inactivity, while living near refineries or freeways exposes some residents to more pollution. Natural hazards like wildfires, drought and earthquakes also threaten entire communities, especially as climate change intensifies.

The plan proposes transportation investments that could shift the entire Bay Area toward more sustainable travel patterns by 2050. In addition to transit connectivity improvements, investments in pedestrian and bicycle infrastructure could help not only commuters to walk and bike to work more easily, but also all residents enjoy the outdoors in their own Bay Area neighborhoods. The Bay Area also could see over a 20% increase in publicly accessible open space acres per capita by 2050, thanks to strategies that protect conservation lands and expand green spaces in urban neighborhoods.

Figure 5-7 shows that in 2023, there were 113 acres of open space (such as parks, forests, or wetlands) for every 1,000 people living in the Bay Area. Without Plan Bay Area 2050+, this number could go down to 91 acres, but plan strategies could raise this rate to 141 acres per 1,000 residents.

Figure 5-7. Open Space Acres per 1,000 Residents



By 2050, nearly all Bay Area homes vulnerable to sea level rise, earthquakes and wildfires could be protected. Strategies focused on adapting to these natural hazards could protect nearly all households in risk-prone areas. Retrofit strategies are expected to reduce buildings' risk exposure to earthquake or wildfire damage by 25% to 50%, compared to a future without plan strategies in place.

State Climate Goals

The California Air Resources Board has set a state-mandated greenhouse gas (GHG) reduction target of 19% that Plan Bay Area 2050+ must meet by 2035. Most notably, the plan's climate strategies, including investments in electric vehicles, charging stations and travel demand management programs, generate the largest reduction in emissions. Pricing strategies and reduced speed limits would further reduce emissions by encouraging more drivers to choose transit or to frequent businesses closer to home. By building more housing near increasingly frequent transit lines, while minimizing highway expansion projects, the region could meet this ambitious goal over the next decade. With all Plan Bay Area 2050+ strategies in place, the Bay Area could reduce GHG emissions by 21% in 2035, exceeding the state target.

Figure 5-8 shows that Plan Bay Area 2050+ meets the state target of a 19% per capita reduction in GHGs for cars and light-duty trucks. For all vehicles, the reduction (including fuel efficiency gains) reaches 39%.

Figure 5-8. Plan Bay Area 2050+ GHG Reduction by 2035

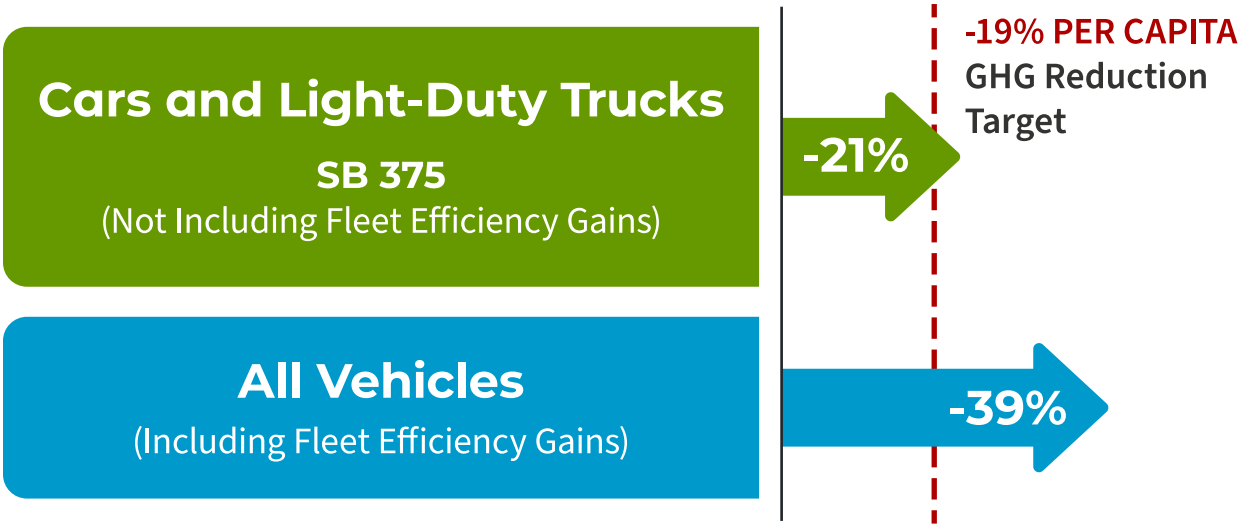


Photo: Flor Haus

Improving Vibrant Outcomes

Since the pandemic, the Bay Area has experienced the lasting effects of sparse foot traffic in downtowns, high commercial vacancies and job losses across all nine counties. While most counties are seeing population growth again, challenges like high costs and limited access to stable, well-paying jobs threaten the region's ability to retain residents and maintain its economic strength.

With this plan's strategies in place, the Bay Area could see a 66% increase in economic output per person, as measured by the region's gross regional product, from $127,000 today to $206,000 in 2050. This change would be driven by a dynamic, productive and recovered Bay Area economy, bolstered by strategies that improve economic mobility for residents. The plan's strategies could also increase the number of workers, visitors and residents in the region's three largest downtowns — Oakland, San Francisco and San José.

Photos (Top to Bottom): Oakland, Karl Nielsen; San Francisco, Joey Kotfica; San José, Flor Haus

The Future Without Plan Bay Area 2050+

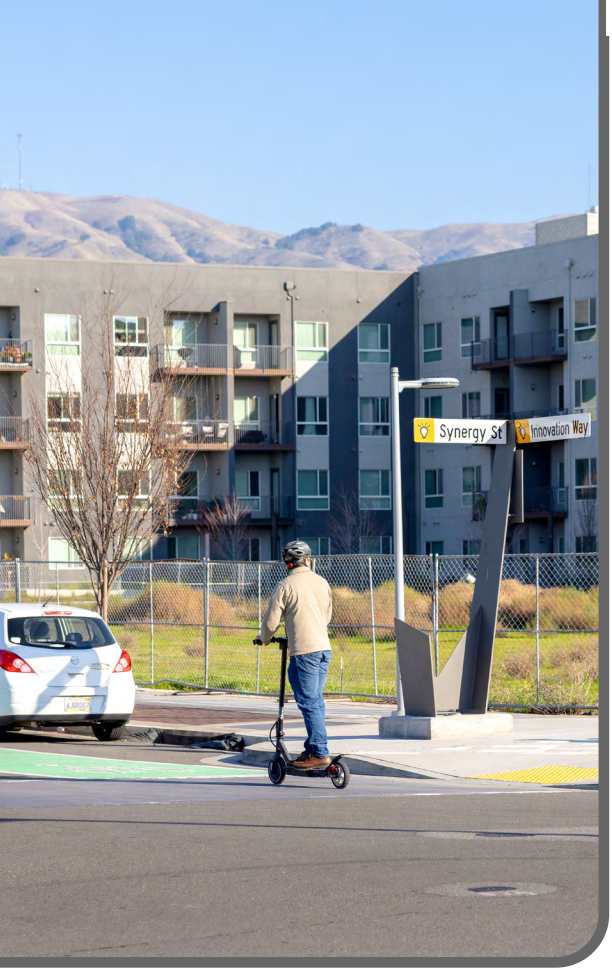
Core planning assumptions guide these predictions for the Bay Area under the strategies and for a future in which no proposed investments or policies are implemented. The following outcomes give a glimpse of what a future Bay Area with no long-range plan could look like — a reminder that if we take no action as a region in the decades ahead, the Bay Area's challenges will likely get even worse. Residents with low incomes would face much higher costs and have access to fewer transportation choices, while the entire Bay Area would feel the environmental effects of higher carbon emissions, more injuries and fatalities, and fewer parks and trails.

Figure 5-9. Future Outcomes, With and Without Plan Bay Area 2050+

Outcomes	2023	2050 Without Plan Strategies Implemented	2050 Plan Strategies Implemented
Share of income spent on combined housing and transportation costs for households with low incomes	94%	82%	47% ☑
Share of income spent on combined housing and transportation costs for all households	42%	40%	32% ☑
Share of all Bay Area households within one-half mile of frequent transit	43%	46%	62% ☑
Home ownership rate for households with low incomes	38%	38%	49% ☑
Share of people commuting via transit, biking or walking	11%	15%	23% ☑
Urban park acres per resident in Equity Priority Communities	2.9	2.2	3.2 ☑

Looking Ahead

Plan Bay Area 2050+ holds significant potential to address many of the region's long-standing challenges, particularly for those most in need and for communities that have been socially and economically disadvantaged. However, realizing this potential will require sustained collaboration across government agencies, private industry and all of the Bay Area's diverse communities. MTC and ABAG cannot implement any of these strategies without thoughtful partnership and collaboration. The following chapter expands on this theme of collective action, outlining the steps necessary to begin implementing Plan Bay Area 2050+ strategies over the next five years.



6 | Starting the Work

Photos (L to R): Top - Ellen V. Baker, Ben Botkin

Photos (L to R): Bottom - Noah Berger, Ben Botkin

Implementation Plan

Photo: Joey Kotfica

Short-Term Steps for Long-Term Change

This Implementation Plan identifies concrete, near-term actions for which MTC and ABAG can take responsibility. While many partners are involved in implementing the plan, to maintain clarity, transparency and accountability, the Implementation Plan highlights only those efforts with direct MTC and ABAG involvement.

The Plan Bay Area 2050 Implementation Plan identified actions to prioritize between 2021 and 2025. This chapter highlights those actions and identifies new implementation actions for 2026 through 2030, aiming to be more focused on achievable priorities, responsive to feedback and measurable in its delivery.

Implementation Progress So Far

In 2021, the Plan Bay Area 2050 Implementation Plan proposed more than 80 actions to make the Bay Area more affordable, diverse, connected, healthy and vibrant. MTC, ABAG and many other partners have made progress on nearly 70% the actions, as of the last analysis done in fall 2024. New housing and transit programs, as well as new frameworks for sea level rise adaptation funding and conservation, were all included as part of the 2021 Plan Bay Area 2050 Implementation Plan. Implementation highlights that follow show how the actions supported the plan's vision.

To make the region more **AFFORDABLE** and **DIVERSE**, MTC, ABAG and the Bay Area Housing Finance Authority (BAHFA) have supported regional housing access through:

- Doorway Housing Portal, a website for Bay Area residents to **find and apply for affordable housing** through a centralized application portal.
- A Housing Preservation Loan Pilot, which **provided millions in low-interest loans** to mission-driven housing developers and community land trusts to acquire and rehabilitate residential properties in order **to preserve their affordability and to curb displacement**.
- More than 300 technical assistance resources developed by the Regional Housing Technical Assistance (RHTA) Program, **helping all cities and counties to update their Housing Elements**.
- The Transit-Oriented Communities (TOC) Policy, to **assist communities in creating more opportunities for housing** near high-quality transit lines.

To make the region more **CONNECTED** and **VIBRANT**, MTC's transit highlights include:

- Completed the Regional Network Management Framework for implementation of the Bay Area Transit Transformation Action Plan to **spur Bay Area transit recovery**.
- Launched Clipper BayPass, **a single transit pass that offers unlimited access** to all bus, ferry and rail services in the nine-county region to institutions, schools and residents of affordable housing.
- Installed and evaluated test **signs and maps** aimed at **easier navigation of Bay Area transit**, deployed at key transit hubs, El Cerrito del Norte and Downtown Santa Rosa.
- Made **accessibility investments** in transit priority and network coordination.
- Supported Senate Bill 63 (Wiener/Arreguín, 2025), aimed at **securing funding to preserve and improve transit** service in the Bay Area.

For the **HEALTHY** guiding principle, MTC and ABAG have:

- Published the Sea Level Rise Funding and Investment Framework to **address near-term sea level rise adaptation needs** and long-term funding in partnership with the San Francisco Bay Conservation and Development Commission.
- **Preserved parks, farmland, open spaces and ecosystems** through refreshing the MTC-ABAG Priority Conservation Area program framework.
- Completed BayREN's Business Plan, which **allocates millions to energy efficiency and electrification programs**, with 60% allocated to **equity programs**.

Photo: Flor Haus

Leveraging Partnerships and Prioritizing Actions

Successful implementation of the Plan Bay Area 2050+ strategies will require collaboration with a range of partners, including local jurisdictions, community-based organizations and transit agencies, as well as complementary implementation efforts led by others. MTC and ABAG gathered feedback through in-person workshops, an online survey for partners and a series of internal cross-agency sessions to align its implementation work with other stakeholders' efforts. The Implementation Plan Report further details key partnerships, explains the plan development process, and includes MTC and ABAG roles for each action. Also included in the report are strategy assessments that evaluate agency authority, financial resources, public and political support, and technical capacity to implement actions that respond to current conditions.

Changes between the Final and the Draft Implementation Plan were guided by public comments received in fall 2025. The draft actions did not change substantially, but refinements were made to clarify language, improve usability and incorporate additional references and examples. The revisions reflect a collaborative process of integrating public and stakeholder feedback while striving for a clear, practical and actionable roadmap for advancing the Plan Bay Area 2050+ vision.

Implementation Actions

Over the past five years, MTC and ABAG launched initiatives to address the Bay Area's most urgent challenges, from modernizing transit and scaling affordable housing programs to advancing climate resilience. With this foundation in place, the focus for the next five years turns to ***delivering***, not launching. Pilot programs can become ongoing solutions, securing the resources needed to sustain progress. By staying the course on commitments already showing results, MTC and ABAG can ensure that the work already underway translates into tangible benefits for communities across the region. Across transportation, housing, the economy and the environment, regional agencies are prioritizing implementation and impact.

The following tables present 65 actions for MTC and ABAG to implement through 2030. To maintain transparency about where MTC has a direct implementation role, the Implementation Plan highlights efforts with MTC and ABAG involvement, rather than attempting to catalog all activities across the Bay Area. Actions are organized by plan element and theme, with actions that touch all themes listed first. A fifth and final section includes cross-cutting actions that span multiple elements. In addition to being sorted by element and theme, actions are categorized as follows:

Plan

Assist

Coordinate

Advocate

Fund

Deliver

The tables provide a high-level overview of the 65 actions MTC and ABAG plan to undertake by 2030. More detailed descriptions are available in the Implementation Plan Report. The additional report also outlines the timeline for each action and identifies whether MTC and/or ABAG will serve in a Lead, Partner or Support role in its implementation.

Photo: Joey Kotfica

Transportation Element Implementation Actions

Key implementation actions for the Plan Bay Area 2050+ Transportation Element focus on strengthening the financial foundation of the region's transit network. MTC will continue to provide impartial information related to a new regional transit measure, advance priorities in the upcoming federal surface transportation reauthorization, and seek additional state and federal funding to support system improvements. Continued investment in existing assets through "Fix It First" funding decisions and asset management initiatives will remain a priority. The plan also emphasizes equity and accessibility, with actions to expand discounted fare programs, address paratransit service needs, and co-design infrastructure and technologies with the disability community. Additional efforts include working with state and local agencies to evolve congestion management efforts along the Bay Area's freeways.

Spotlight: Transportation

Photo: Noah Berger

Securing a Stable Transit Future With a Regional Revenue Measure

Since 2020, MTC and the Bay Area's transit agencies have successfully advocated for stopgap funding from Congress and the state Legislature to keep the Bay Area connected with reliable bus, train and ferry service, despite much lower fare revenue due to post-pandemic travel patterns. As of 2025, five of the region's largest transit agencies face an estimated $3.7 billion deficit through 2030. To secure the reliable financial resources to sustain and improve Bay Area transit into the future, MTC supported Senate Bill 63 (Wiener/Arreguín, 2025), which authorizes a 14-year regional transportation sales tax on the November 2026 ballot in Alameda, Contra Costa, San Francisco, San Mateo and Santa Clara counties.

Approximately 60% of the revenue that would be raised by the measure, if approved by voters, would be dedicated to BART, Muni, Caltrain, AC Transit, San Francisco Bay Ferry and smaller transit agencies providing service in the five counties to keep buses, trains and ferries moving. About one-third is guaranteed to Santa Clara VTA, SamTrans, the Alameda County Transportation Commission and the Contra Costa Transportation Authority, with flexibility to use funds for transit capital, operations, or road paving projects on roads with regular bus service. A final 5% is reserved to advance popular rider-focused improvements like Clipper START to make transit more affordable, accessible and easy to use.

Theme and Strategies	Implementation Vehicle	Implementation Actions
All Transportation Strategies	FUND	1. **Prepare for a new regional transit revenue measure for 2026 and beyond.** Provide impartial information in response to requests for information about the measure's impact.
		2. **Advance MTC's priorities in the next federal surface transportation reauthorization.** Develop and advance a reauthorization platform grounded in the 2025 MTC-ABAG Joint Advocacy Program, engaging partners at all levels to build support ahead of anticipated expiration in September 2026.
		3. **Identify and pursue other diverse funding sources to accelerate transportation system enhancements.** Seek new partnerships and advocate for additional or more flexible federal and state funding to sustain critical services and support a reliable, safe, easy-to-navigate and integrated transit network.
	DELIVER	4. **Expand and align affordability and equity programs across roadway tolling and transit fare strategies.** Evaluate existing and potential discount and reinvestment programs (e.g., Express Lanes START, Clipper START, SR-37 tolling and local programs such as the US-101 Go Card Program) for gaps and scalability and, where appropriate, expand program reach by leveraging partnerships. Explore implementing successful, scalable programs consistently and regionally.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Maintain and Operate the Existing System: ***Fix It First*** T1. Operate and Maintain the Existing System	**DELIVER**	**5. Coordinate existing funding for Fix It First initiatives while sustaining and enhancing asset management programs.** Maintain support for existing programs, including StreetSaver, Pavement Technical Assistance Program, and Regional Transit Capital Inventory, and develop detailed asset management plans for each BATA toll bridge as outlined in the BATA Recovery Action Plan.
		6. Deliver projects and advocate for policies that sustain and improve the operation, efficiency, effectiveness and customer experience of the Bay Area's transportation system Implement near-term projects through MTC programs like Bay Area Toll Authority (BATA) toll bridge operations, FasTrak®, Clipper®, Freeway Service Patrol and Express Lanes among others.
		7. Improve effectiveness of existing transit service with low-cost and cost-neutral coordinated improvements between transit agencies. Coordinate with sub-regional groups of transit agencies to plan and implement low-cost or cost-neutral service effectiveness improvements to reduce redundancies and better align services with ridership types (similar to the Marin-Sonoma Coordinated Transit Service Plan).
	COORDINATE	**8. Collaborate with transit agencies and other partners, including the state, to attract and retain transit workers.** Support regional and statewide workforce development initiatives to ensure sufficient staffing levels, such as training and certification programs and other initiatives to facilitate career entry, development and retention for transit operations and maintenance as well as skilled construction trades.
	ADVOCATE	**9. Address challenges with the California Air Resources Board's (CARB) Innovative Clean Transit (ICT) implementation timeline.** Coordinate with transit agencies, the California Transit Association, the Bay Area Air District and state legislators to modify the implementation timeline established by CARB or seek exemptions from CARB as necessary and permitted in regulation, given significant costs and limited availability of zero-emission buses.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Maintain and Operate the Existing System: ***Improve the Rider Experience*** T2. Improve the Rider Experience through Transit Network Integration T3. Improve the Rider Experience through Refined Transfer Timing at Key Regional Hubs T4. Enhance Security Measures and Improve Safety and Cleanliness on Transit	**PLAN**	**10. Update the 2021 Transit Transformation Action Plan (TAP) and continue collaboration with transit agencies and stakeholders to implement TAP initiatives.** Review and revise timelines, prioritize new actions, and refine performance metrics to evaluate transit network integration efforts.
	DELIVER	**11. Collaborate with transit agencies and other partners to transition the current Regional Mapping and Wayfinding pilot project into an ongoing program.*** Partner with transit agencies to expand physical and electronic mapping information and assets across Bay Area transit stations.
		12. Advance integration of regional fare programs through Clipper improvements and policy implementation.* Expand Next Generation Clipper fare enhancements and interagency transfer discounts and build on the successes of the Clipper BayPass pilot to provide permanent, equitable fare options and seamless regional transit access for low-income riders and the broader public.
	COORDINATE	**13. Streamline and improve paratransit services and fixed-route transit to enhance access and mobility for seniors and people with disabilities.*** Collaborate with transit agencies and other transportation service providers to secure funding and implement the recommendations of the Coordinated Plan, including mobility management, travel training programs, expanded fixed-route physical accessibility, and cost-effective alternatives for paratransit riders.
		14. Partner with transit agencies to analyze existing transit transfers, implement key improvements at transit hubs, support subregional coordinated service planning, and improve quality and accuracy of real-time rider information.* Identify service enhancements to transfer hubs, facilitate schedule coordination, promote collaborative subregional service planning, and improve real-time performance monitoring tools to strengthen regional transit connectivity and operational effectiveness.
		15. Explore opportunities to align regional standards for transit safety, security and cleanliness. Coordinate with transit agency staff and other partners to identify strategies to improve transit safety, security and cleanliness, including innovative cleanliness and maintenance programs such as an "Adopt-a-Stop/Station" program.

* ***The forthcoming update to the Transit Transformation Action Plan (TAP) will further detail and prioritize these implementation actions.***

Theme and Strategies	Implementation Vehicle	Implementation Actions
Maintain and Operate the Existing System: *Manage Freeways and Advance Programs* T5. Implement Pricing Strategies to Manage Demand T6. Modernize Freeways and Interchanges T7. Expand Freeways and Mitigate Impacts T8. Advance Other Regional Programs and Local Priorities	**ASSIST**	**16. Provide support to local jurisdictions in adopting parking management and pricing strategies.** Maintain and update technical assistance that helps local jurisdictions adopt demand-based parking management and pricing, as well as best practice resources like the Parking Playbook.
	PLAN	**17. Update guidance for Community-Based Transportation Planning (CBTP) and Countywide Transportation Plans (CTPs) to strengthen equity and maximize local impact.** Refine program criteria and explore funding strategies to better support CBO partnerships and community-driven outcomes.
		18. Monitor statewide changes to road pricing and freeway modernization policy and complete a second-stage road pricing planning study. Coordinate with regional partners to track the State Roadway Pricing Working Group, the Caltrans Statewide Express Mobility Action Plan, the Caltrans District 4 Managed Lane System Plan and efforts by other major Metropolitan Planning Organizations.
		19. Leverage advanced technologies to improve the operations and safety of the major travel corridors in the Bay Area. Optimize corridor performance by integrating key traffic management systems such as adaptive ramp metering, managed lanes, and incident management.
		20. Update how MTC works with partners to manage congestion and reduce vehicle miles traveled, including by reviewing the approach to future Express Lanes and how they operate within a changing regulatory context. Revisit MTC's Express Lanes Strategic Plan within the post-SB 743 regulatory environment to inform strategic refinements in line with state goals.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Create Healthy and Safe Streets T9. Build a Complete Streets Network T10. Advance Regional Vision Zero Policy through Street Design and Reduced Speeds	**ASSIST**	**21. Improve street safety and expand active transportation through a package of technical assistance offerings.** Offer a suite of technical assistance to advance active transportation, Vision Zero, complete streets, and overall street safety improvements through knowledge-sharing events, training, best practice guidance, data tools, coordination, grant-writing, design funding assistance, and aligned investments.
		22. Support automated speed enforcement and policy development. Work with state and local partners to expand automated speed enforcement in targeted locations, particularly along high-risk corridors and freeways.
Build a Next Generation Transit Network T11. Enhance Transit Frequency, Capacity, and Reliability T12. Expand Transit Services throughout the Region	**DELIVER**	**23. Advance Regional Transit Priority policies, infrastructure and enforcement.*** Implement the Bay Area Transit Priority Policy for Roadways and establish support programs for transit priority infrastructure improvements.
	COORDINATE	**24. Explore approaches to improve the efficiency and cost-effectiveness of transportation project delivery with partners.** Convene project sponsors, industry experts and other stakeholders to recommend actions that accelerate megaproject delivery and manage risk.
	PLAN	**25. Update how MTC prioritizes and sequences large transportation capital projects following Plan Bay Area 2050+ adoption.** Collaborate with stakeholders to refine the Major Project Advancement Policy, which was first developed in 2022 following Plan Bay Area 2050 adoption.
	ADVOCATE	**26. Advocate for maintaining existing federal funding commitments to major rail investments in the region.** Partner with stakeholders to advocate that large regional rail projects currently receiving or earmarked to receive Federal Transit Administration New Starts funding do not have those funds removed or delayed.

** The forthcoming update to the Transit Transformation Action Plan (TAP) will further detail and prioritize these implementation actions.*

Housing Implementation Actions

Key implementation actions for the Plan Bay Area 2050+ Housing Element focus on addressing the region's ongoing affordable housing funding gap and supporting local governments in meeting their housing goals. Over the next several years, MTC, ABAG and BAHFA will pursue new funding sources — including a potential 2028 regional housing revenue measure — and seek near-term funding to sustain core production, preservation and tenant protection programs. Additional efforts include expanding the Doorway Housing Portal, supporting implementation of adopted Housing Elements and continuing to advance the Transit-Oriented Communities Policy. The 3Ps of protection, production and preservation guide BAHFA's work. Technical assistance will follow this 3Ps framework by focusing on local efforts — particularly those on public land and other priority sites — to protect tenants, address homelessness, streamline housing production and preserve currently affordable housing.

Spotlight: Housing

Photo: Joey Kotfica

Revenue Measure, Scaling Proven Housing Solutions With Local Commitment

In recent years, short-term state funding has jump-started critical housing initiatives through BAHFA that protect tenants, preserve affordable housing and support new development. The next phase is about building a foundation to deliver at scale. MTC, ABAG and BAHFA are committed to working with local, regional and state partners to lay the groundwork for a potential 2028 regional housing revenue measure and expand the reach and impact of successful BAHFA pilot programs. With federal housing support uncertain, the Bay Area must take ownership of its housing future. This effort is key to addressing the region's long-standing housing affordability crisis and supporting both residents and the regional workforce by increasing access to stable, affordable homes across all communities.

Theme and Strategies	Implementation Vehicle	Implementation Actions
All Housing Strategies	**FUND**	**27. Coordinate with local, regional and state partners on potential near-term ballot measure(s) to expand affordable housing funding, including a potential regional housing revenue measure as early as 2028.** Convene stakeholders regionwide to gather input and shape regional investment and policy priorities.
		28. Pursue near-term funding to sustain existing regional housing programs and respond to local needs. Seek grant and philanthropic support and state funding to maintain BAHFA and RHTA initiatives, ensuring assistance for local jurisdictions and continuity of production, preservation, and tenant protection efforts.
Protect and Preserve Affordable Housing H1. Strengthen Renter Protections H2. Preserve Existing Affordable Housing	**DELIVER**	**29. Sustain, enhance and expand the Doorway Housing Portal to help residents find and apply for affordable housing.** Collaborate with partners including jurisdictions, affordable housing property managers, service providers, policymakers, community groups, and residents to simplify and streamline the affordable housing application process.
	ADVOCATE	**30. Continue to support state policies that improve housing affordability and tenant protections.** Monitor and engage in relevant state policy discussions to support efforts that promote housing stability and affordability across the region.
	ASSIST	**31. Strengthen technical assistance for renter protections and homelessness prevention.** Through the Regional Housing Technical Assistance (RHTA) program and other initiatives, support Bay Area jurisdictions in implementing effective local strategies.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Spur Housing Production for People of All Income Levels H3. Allow a Greater Mix of Housing Densities and Types in Growth Geographies H4. Build Adequate Affordable Housing to Ensure Homes for All H5. Integrate Affordable Housing into All Major Housing Projects H6. Transform Aging Malls and Office Parks into Neighborhoods	**ASSIST**	**32. Evaluate the effectiveness of the Priority Sites Pilot Program and explore long-term funding options.** Assess the program's success in supporting the reuse of underutilized properties — such as malls, office parks, and public land near key regional transit hubs — to guide future investments.
		33. Support local jurisdictions in implementing Housing Elements that promote inclusive communities and prepare for the next Regional Housing Needs Allocation (RHNA). Provide technical assistance, data tools and regional coordination, and begin research and robust engagement efforts to support the development of the next RHNA methodology.
		34. Assist local jurisdictions in implementing state housing laws to accelerate residential development while maintaining consistency with local planning goals. Update Regional Housing Technical Assistance (RHTA) guidance documents for single family residential zones to reflect current legislation on objective design standards.
		35. Implement and monitor the Transit-Oriented Communities (TOC) Policy to foster transit-supportive development and high-quality urban design. Provide additional planning grants and technical assistance to help jurisdictions comply with TOC Policy requirements.
		36. Improve the feasibility of affordable housing production through local development streamlining and funding alignment. Offer templates and technical assistance to local governments to expedite production and reduce financing complexity to further lower per-unit costs.
	ADVOCATE	**37. Support state policies to increase the production of housing, including housing affordable to people at all income levels.** Advocate for policies that reduce the cost of developing housing, including exploration of changes to state building regulations and streamlined state funding applications.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Create Inclusive Communities H7. Provide Targeted Mortgage, Rental, and Small Business Assistance to Equity Priority Communities H8. Accelerate Reuse of Public and Community-Owned Land for Mixed-Income Housing and Essential Services	**ASSIST**	**38. Expand and improve technical assistance for plan-aligned housing projects on public lands.** Develop guidance, templates and case studies to support local governments in leveraging public land for affordable housing and demonstrating innovative practices.
	COORDINATE	**39. Partner with organizations that promote disability-inclusive design to raise awareness of disability standards.** Foster collaboration by inviting housing planners into disability-focused spaces and including disability professionals in housing conversations. Support design practices that align with and advance ADA and universal design standards at both the building and neighborhood scale.

Economy Implementation Actions

Key implementation actions for the Plan Bay Area 2050+ Economy Element acknowledge the importance of economic resilience while recognizing the limited authority, funding and capacity of MTC and ABAG in this space. Staff will support regional partners through participation in efforts like the California Jobs First Bay Area Collaborative, which is working to implement the 2025 Comprehensive Economic Development Strategy. Additional work includes coordinating with stakeholders on goods movement and industrial land planning, with a focus on balancing freight efficiency with equity and environmental goals. Looking ahead, MTC and ABAG will engage partners to explore how economic priorities could be further integrated into future long-range planning for transportation, housing and the environment.

Spotlight: Economy

Photo: Noah Berger

Grounding Economic Progress in Core Regional Actions

The economy remains elemental to Plan Bay Area 2050+, and as implementation moves forward, the emphasis is on deepening the economic impact of transportation, housing and environmental actions. By concentrating on these foundational priorities, the agencies aim to unlock broader economic mobility and resilience. Over the next four years, MTC and ABAG will explore how economic priorities can be more intentionally integrated across the plan, possibly mirroring the way equity has become a cross-cutting theme.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Improve Economic Mobility and Shift the Location of Jobs EC1. Implement a Statewide Guaranteed Income EC2. Expand Job Training and Incubator Programs EC3. Invest in High-Speed Internet in Underserved Low-Income Communities EC4. Allow a Greater Mix of Land Uses and Densities in Growth Geographies EC5. Provide Incentives to Employers to Locate in Low-VMT Areas EC6. Retain and Invest in Key Industrial Lands	**COORDINATE**	**40. Support regional economic development planning by collaborating with partners and providing industry-specific insights.** Continue participating in the California Jobs First Bay Area Collaborative, providing input on economic development implementation initiatives and contributing ideas to a future Comprehensive Economic Development Strategy update.
	PLAN	**41. Update the Regional Goods Movement Plan, while integrating industrial land use considerations to support economic resilience and sustainability.** Coordinate with partners to assess freight trends, port activity and industrial land needs and identify priority actions that enhance goods movement efficiency while supporting equity, environmental goals and freight mode shift.
		42. Assess the efficacy of the Priority Production Area Pilot Program in strengthening the viability of industrial lands. Evaluate the PPA program's work supporting local jurisdictions in retaining and investing in their key industrial lands.
		43. Determine how best to incorporate economic priorities into Plan Bay Area 2060 in alignment with MTC-ABAG core responsibilities. Engage stakeholders to explore ways to embed economic considerations holistically into all plan elements, mirroring the integrated approach used for topics such as equity and resilience.

Environment Implementation Actions

Key implementation actions for the Plan Bay Area 2050+ Environment Element reflect strong public and regional support for climate resilience, abundant parks and open space, and emissions reduction efforts. Through entities like BayREN and the San Francisco Estuary Partnership (SFEP), staff will support programs that reduce energy use, expand electrification, and build local capacity for conservation and sea level rise adaptation. MTC will also continue to partner on efforts to reduce transportation-related emissions by refreshing, modernizing and potentially expanding transportation demand management initiatives. Additional coordination will focus on addressing grid interconnection barriers for building electrification and EV charging, and piloting tools to accelerate conservation and project delivery.

Spotlight: Environment

Photo: Ben Botkin

Environmental Assistance, From Planning to Projects: Delivering Climate Adaptation Where It Is Needed Most

As the Bay Area accelerates its efforts to reduce greenhouse gas emissions, the urgency of adapting to a changing climate has come into sharp focus, especially along the Bay Area's vulnerable shorelines. While state agencies and local jurisdictions lead the charge, MTC, ABAG and SFEP are focused on enabling implementation, bridging the gap between planning and on-the-ground resilience projects. Building on prior work, the agencies will expand technical and project delivery assistance to local communities facing sea level rise, especially those with fewer resources. This assistance includes support for nature-based infrastructure like horizontal levees, research coordination on green infrastructure, and critical investments in the State Route 37 Corridor that protect against flooding while enhancing ecological health and public access. This work is closely coordinated with the San Francisco Bay Conservation and Development Commission (BCDC), which leads shoreline adaptation planning, and Caltrans, to ensure state highways and toll bridges remain safe and reliable for moving people and goods. In 2020, Caltrans released the Adaptation Priorities Report for the Bay Area, identifying key segments of the state highway system most vulnerable to climate impacts. MTC will continue working with Caltrans and other partners to integrate resilience into infrastructure planning and future investments.

Together, local, regional and state agencies are working to ensure that climate adaptation moves beyond plans on paper and becomes a resilient reality for the Bay Area.

Theme and Strategies	Implementation Vehicle	Implementation Actions
All Environment Strategies	**FUND**	**44. Pursue a variety of new funding sources to advance Environment Element actions.** Build new partnerships, seek competitive grants bolstered by state Climate Bond funds, and advocate for expanded or more flexible federal and state funding.
	ADVOCATE	**45. Defend climate action and adaptation policies and existing funding programs.** Support efforts to protect California's authority to exceed federal clean vehicle standards, and support Bay Area efforts to reduce greenhouse gas emissions and improve air quality in vulnerable communities.
	COORDINATE	**46. Track and coordinate electrification working groups to address common grid barriers.** Share knowledge and align strategies among regional and state initiatives to address grid interconnection barriers for building electrification, on- and off-road EV infrastructure and electric fleets.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Reduce Risks From Hazards EN1. Adapt to Sea Level Rise EN2. Provide Means-Based Financial Support for Seismic, Wildfire, and Accessibility Home Retrofits EN3. Provide Means-Based Financial Support for Energy Decarbonization and Water Efficiency Upgrades in All Buildings	**DELIVER**	**47. Enhance BayREN's building energy programs for residential and commercial renters and property owners, including local governments, with a focus on health and resilience.** Deliver education, technical assistance and incentives for building improvements that reduce energy use, greenhouse gas emissions and grid impacts.
	ASSIST	**48. Expand planning, funding and project delivery technical assistance for sea level rise adaptation.** Coordinate with partners to deliver more streamlined and unified sea level rise technical assistance, making it easier to identify and track available opportunities, as described in the Sea Level Rise Interagency MOU.
		49. Support BCDC in advancing efforts to strategically plan for and fund climate adaptation. Partner with the Bay Conservation and Development Commission (BCDC) to continue inventorying and evaluating sea level rise adaptation projects across the region in coordination with local project sponsors. Coordinate efforts with other regional and state partners such as Caltrans, State Coastal Conservancy, State Coastal Commission and Delta Stewardship Council.
		50. Strengthen resources that support resilient housing. Update guidance for soft-story retrofits and home hardening to help jurisdictions adopt stronger seismic and wildfire safety policies and programs.

Theme and Strategies	Implementation Vehicle	Implementation Actions
Expand Access to Parks and Open Space EN4. Maintain Urban Growth Boundaries EN5. Protect and Manage High-Value Conservation Lands EN6. Expand Urban Greening in Communities	**DELIVER**	**51. Pilot methods to accelerate conservation and transportation project delivery.** Promote the protection and restoration of priority habitats by piloting a new funding tool.
	ASSIST	**52. Help local governments advance conservation, trails integration and green infrastructure.** Offer technical support and resources to assist Open Space and Conservation General Plan Element updates, advance the Bay Trail, and promote trails in developed areas.
Reduce Climate Emissions EN7.Expand Commute Trip Reduction Programs at Major Employers EN8. Expand Clean Vehicle Initiatives EN9. Expand Transportation Demand Management Initiatives	**FUND**	**53. Support local efforts to expand electric mobility options.** Leverage MTC's transportation electrification initiative to scale clean transportation, including EV incentives, electric bikeshare, e-bikes, carshare and charging stations.
	PLAN	**54. Assess and optimize transportation demand management (TDM) initiatives based on recent travel trends.** Collaborate with local agencies, employers and transit partners to reduce traffic by providing alternatives to driving.
		55. Review and evolve the Commuter Benefits Program that incentivizes commuters to not drive to work alone to reduce traffic congestion and greenhouse gas emissions. Collaborate with the Air District and other partners to assess impacts and explore expanded program coverage, leveraging recent improvements to the employer database and upcoming market research.

Photo: Karl Nielsen

Cross-Cutting Implementation Actions

In addition to the strategy-specific implementation actions identified in this chapter, several cross-cutting actions have been identified that reflect the deeply interconnected nature of this plan's elements. These actions span multiple elements and support many plan strategies. Together, they aim to strengthen the foundation of regional planning through targeted work on funding, policy reform, technical assistance and data. MTC and ABAG will advocate for continued funding to support local implementation and will collaborate with state partners to modernize planning laws, such as Senate Bill 375. Staff aim to improve the cohesiveness of varied technical assistance offerings by applying user-centered design principles and leveraging existing agency tools to better serve local governments. Additional priorities include updating the Regional Growth Framework and Equity Priority Communities methodology, launching enhanced progress metrics through the Vital Signs dashboard, and analyzing post-COVID shifts in travel and land use to guide future planning.

Cross-Cutting		
Theme and Strategies	**Implementation Vehicle**	**Implementation Actions**
All Plan Elements and Strategies	**FUND**	**56. Advocate for continued state Regional Early Action Planning (REAP) funding to support Plan Bay Area 2050+ implementation.** Work with the state to build on the success of REAP 1.0 and 2.0, which supported enhanced regional technical assistance and local grant programs that advance housing, climate, sustainability, equity and mobility goals.
	ASSIST	**57. Develop resource offerings that are easy to find, clearly presented and tailored to local priorities — making engagement with regional programs more efficient and worthwhile.** Strengthen and streamline technical assistance using a user-centered approach to better serve local governments and partners.
	COORDINATE	**58. Increase engagement with the disability community to collaboratively and comprehensively meet needs.** Establish ongoing forums and partnerships to include the voices and leadership of people with disabilities in planning.
	ADVOCATE	**59. Advocate for reforms to Senate Bill 375 and related state guidelines.** Coordinate with stakeholders, including state and local partners, to support reforms that improve cross-government collaboration toward shared climate goals.

Cross-Cutting		
Theme and Strategies	**Implementation Vehicle**	**Implementation Actions**
All Plan Elements and Strategies	**PLAN**	**60. Develop and maintain metrics to monitor progress toward key Plan Bay Area 2050+ goals.** Launch a new dashboard on MTC's Vital Signs webpage that tracks regional indicators to visualize key regional trends, updating the metrics as new data becomes available.
		61. Convene a technical advisory committee to review and update the Regional Growth Forecast Methodology. Invite subject matter experts to join a technical advisory committee to discuss demographic and economic trends that affect the region's growth trajectory.
		62. Update the Regional Growth Framework (MTC and ABAG's planning framework that aims to guide the growth of future households and jobs) to support local implementation and align more closely with regional goals and investments. Integrate evolving data around equity, climate, and the economy; and simplify and clarify the framework to help local governments more effectively apply it in planning, funding, and implementation efforts.
		63. Strengthen the Equity Priority Communities (EPC) framework to more effectively guide equitable regional planning. Reevaluate and update the EPC methodology by incorporating quantitative and qualitative data, exploring alternative equity analysis approaches, addressing current limitations, and prioritizing meaningful engagement with communities and other stakeholders.
		64. Analyze post-COVID shifts in regional travel behavior, remote work and land use preferences to inform future planning, technical assistance and investment. Conduct targeted research on emerging travel patterns, technologies such as artificial intelligence and autonomous vehicles and lifestyle trends to assess their impact on regional growth, mobility and sustainability outcomes.
	DELIVER	**65. Build and maintain robust regional databases to support models, maps and analytics.** Develop an agency-wide data strategy that provides a roadmap to deliver open data and offer new forms of data visualization and analysis.

Photo: Noah Berger

Charting the Course Forward: 2060 and Beyond

MTC and ABAG can provide strong regional leadership on some of the most pressing transportation, housing, economic and environmental challenges facing the Bay Area. But regional government alone cannot achieve any of this plan's ideas. The agencies rely on partners throughout the planning and implementation process, and continued collaboration will be required to move all strategies forward.

As a limited and focused update, Plan Bay Area 2050+ did not thoroughly explore alternative scenarios, defined by more pessimistic or optimistic conditions. Plan Bay Area 2060 will be the next iteration of the Bay Area's long-range plan, and work already has begun. Exploration of a range of potential trajectories for the Bay Area's future will be an important next step to plan for the long-term success of the region. New or revised strategies, as well as related implementation actions, may emerge from this effort over the coming years.

The current document, as well as its predecessor Plan Bay Area 2050 (released in 2021), took an aspirational approach to regional planning by analyzing what resources truly would be needed to make meaningful progress on key performance and equity goals. MTC and ABAG began by asking, "What would it take to achieve the plan's long-range vision?" and determined that extensive new public investments, including both existing and new revenues, would be necessary to achieve the vision of a more affordable, connected, diverse, healthy and vibrant Bay Area.

In a deeply uncertain world in which MTC and ABAG can act as regional leaders but not necessarily enact any strategy alone, the agencies acknowledge that this approach may require reconsideration in the next plan. Different funding and policy scenarios could unlock new ideas and initiatives, and more conversations and partnerships will be crucial to these efforts. Through current implementation actions that feed into thoughtful future planning, the Bay Area's nine counties can prepare themselves for a better Bay Area, together.

Photo: Peter Beeler

Metropolitan Transportation Commission and Association of Bay Area Governments

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Chief Financial Officer

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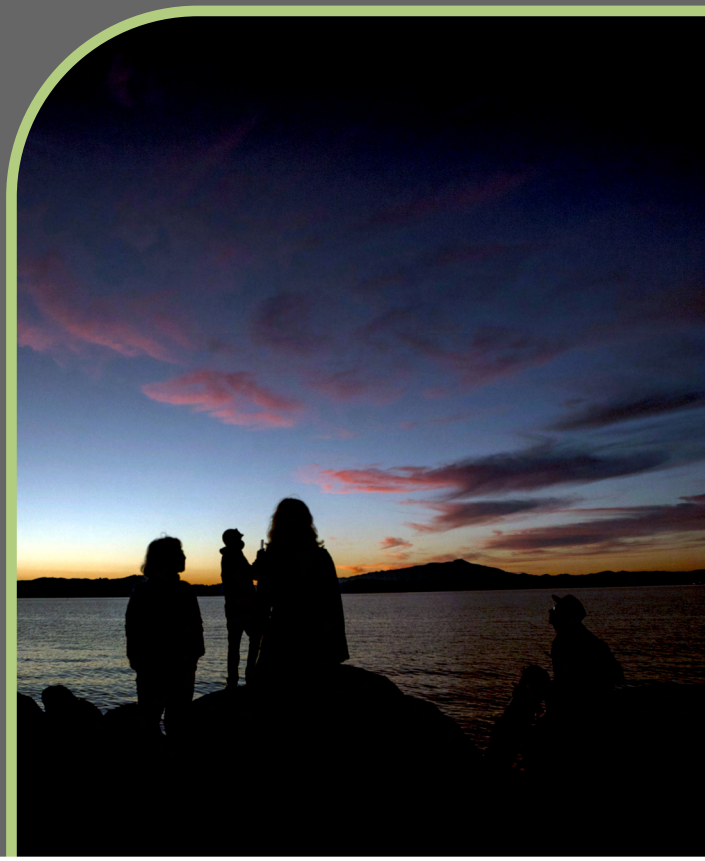
PLAN BAY AREA 2050+



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Metropolitan Transportation Commission

Legislation Text

File #: 26-0384, **Version:** 1

Subject:
MTC Resolution No. 4646, Revised. 2025 Transportation Improvement Program (TIP) Amendment 2025-28

Adoption of MTC Resolution No. 4646, Revised, approving TIP Amendment 2025-28.

Presenter:
Dave Vautin

Recommended Action:
Commission Approval

Metropolitan Transportation Commission

MTC Planning Committee

March 13, 2026 **Agenda Item 8e**

MTC Resolution No. 4646, Revised. 2025 Transportation Improvement Program (TIP)

Amendment 2025-28

Subject:

Request referral of MTC Resolution No. 4646, Revised, to the Commission for approval.

Background:

The TIP is a comprehensive listing of San Francisco Bay Area surface transportation projects that are federally funded, require a federal action, or are considered regionally significant for air quality purposes. The TIP is updated every two years, as required by state statute, and is revised as needed through amendments or administrative modifications.

Adopted by the MTC Commission in September 2024, the 2025 TIP includes transportation projects and funding for the four-year period from federal fiscal year (FY) 2024-25 through 2027-28. The TIP is posted on MTC's website at: https://mtc.ca.gov/funding/transportation-improvement-program-tip.

Amendment 2025-28 revises four existing projects in the 2025 TIP with a net funding increase of approximately $11.2 million and serves to conform the 2025 TIP to *Plan Bay Area 2050+*. Among other changes, this revision:

- Updates the funding plans or project details of four projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ) funds; and
- Demonstrates that the 2025 TIP, as revised, is consistent with *Plan Bay Area 2050+*.

The TIP Revision Summary for this amendment is attached and posted at: https://mtc.ca.gov/funding/transportation-improvement-program/2025-tip/2025-tip-revisions.

The project changes included in this revision (Attachment C) demonstrate that the 2025 TIP, as revised, is consistent with *Plan Bay Area 2050+*. Changes made with this revision do not conflict with the financial constraint requirements. The Transportation-Air Quality Conformity Analysis for *Plan Bay Area 2050+* and Amended 2025 TIP that is being considered under

Agenda Item 8b demonstrates that the TIP and Plan are consistent with ("conform to") the federal air quality plan known as the State Implementation Plan (SIP).

The TIP public participation process, including this amendment notice, serves to satisfy the public involvement requirements of the Federal Transit Administration (FTA) annual Program of Projects (POP) for applicable funds. Public notice of public participation activities and time established for public review of and comments on the TIP will satisfy the FTA Section 5307 POP requirements.

Staff will transmit this amendment to Caltrans after Commission approval. Caltrans will then forward the amendment to FTA and Federal Highway Administration (FHWA) as required for final federal agency review and approval.

Issues:

This revision to the 2025 TIP contains programming changes that are contingent upon:

- The Commission's approval of Item 8b (MTC Resolution No. 4748 - Final Air Quality Conformity Analysis)
- The Commission's and ABAG Executive Board's approval of Item 8c (MTC Resolution No. 4749 and ABAG Resolution No. 01-2026 - Final Environmental Impact Report (EIR))
- The Commission's and ABAG Executive Board's approval of Item 8d (MTC Resolution No. 4750 and ABAG Resolution No. 02-2026 - *Plan Bay Area 2050+*).

Recommendations:

The MTC Planning Committee refers MTC Resolution No. 4646, Revised to the Commission for approval.

Attachments:

- Attachment A: MTC Resolution No. 4646, Revised
  - Attachment B
- Attachment B: TIP Revision Summary for TIP Amendment 2025-28
- Attachment C: Proposed ID Updates for Projects in the 2025 TIP to Align with *Plan Bay Area 2050+*

Andrew B. Fremier

Date: September 25, 2024
W.I.: 1512
Referred by: PAC
Revised: 12/18/24-C 01/22/25-C 02/26/25-C 03/26/25-C 04/23/25-C 05/28/25-C 06/25/25-C 07/23/25-C 09/10/25-C 09/24/25-C 10/22/25-C 02/25/26-C 03/25/26-C

ABSTRACT

Resolution No. 4646, Revised

This resolution adopts the 2025 Transportation Improvement Program (TIP) for the San Francisco Bay Area. Supporting documents as listed in Attachment A.

On March 25, 2026, subsequent revisions listed below and described further in Attachment B to this resolution.

Further discussion of the 2025 TIP adoption is contained in the Programming & Allocations Committee summary sheets dated September 11, 2024, December 11, 2024, January 8, 2025, February 12, 2025, March 12, 2025, April 9, 2025, May 14, 2025, June 11, 2025, July 9, 2025, September 10, 2025, October 8, 2025, and February 11, 2026 and to the Planning Committee dated March 13, 2026.

2025 TIP Revisions

Revision #	Revision Type	# of Projects	Net Funding Change ($)	MTC Approval Date	Final Approval Date
2025-01	Amendment	96	$1,821,513,444	12/18/2024	2/28/2025
2025-02	Admin Mod	66	$145,381,130	12/31/2024	12/31/2024
2025-03	Amendment	24	$647,145,468	1/22/2025	2/28/2025
2025-04	Admin Mod	13	$12,369,173	2/10/2025	2/10/2025
2025-05	Amendment	20	$133,469,678	2/26/2025	3/28/2025
2025-06	Admin Mod	14	$7,080,557	3/19/2025	3/19/2025
2025-07	Amendment	17	$125,696,053	3/26/2025	5/8/2025
2025-08	Admin Mod	16	$244,368,039	4/9/2025	4/9/2025
2025-09	Amendment	13	$148,338,325	4/23/2025	5/23/2025
2025-10	Admin Mod	23	-($193,225,515)	5/9/2025	5/9/2025
2025-11	Amendment	8	$175,712,578	5/28/2025	7/18/2025
2025-12	Admin Mod	41	$21,401,299	6/9/2025	6/9/2025
2025-13	Amendment	25	$592,586,653	6/25/2025	7/18/2025

2025-14	Admin Mod	23	$40,081,927	6/20/2025	6/20/2025
2025-15	Amendment	12	$93,219,855	7/23/2025	8/15/2025
2025-16	Admin Mod	11	$6,507,556	7/31/2025	7/31/2025
2025-17	Admin Mod	15	$383,500,383	8/14/2025	8/14/2025
2025-18	Amendment	3	$ 968,718,432	9/10/2025	9/15/25
2025-19	Amendment	28	$124,080,648	9/24/25	10/17/25
2025-20	Admin Mod	63	$1,489,768,110	10/15/25	10/15/25
2025-21	Amendment	111	$2,736,525,861	10/22/25	11/7/25
2025-22	Admin Mod	54	$66,427,325	11/17/25	11/17/25
2025-23	Admin Mod	32	$186,068,556	12/1/25	12/1/25
2025-24	Admin Mod	52	$83,261,874	1/14/26	1/14/26
2025-25	Admin Mod	5	$0	1/23/26	1/23/26
2025-26	Admin Mod	24	$35,201,095	3/3/26	3/3/26
2025-27	Amendment	6	$177,726,435	Pending	Pending
2025-28	Amendment	4	$11,151,000	Pending	Pending
Net Funding Change		820	$10,284,075,939		

Note: Net funding changes reflect funding changes in the four years of the 2025 TIP as well as changes to funds programmed in prior or future years, which are included for informational purposes only.

Date: September 25, 2024
W.I.: 1512
Referred by: PAC

Re: Adoption of the 2025 Transportation Improvement Program (TIP)

METROPOLITAN TRANSPORTATION COMMISSION
RESOLUTION NO. 4646

WHEREAS, the Metropolitan Transportation Commission (MTC) is the regional transportation planning agency for the San Francisco Bay Area pursuant to California Government Code Section 66500 et seq.; and

WHEREAS, MTC is the federally designated Metropolitan Planning Organization (MPO), pursuant to Section 134(d) of Title 23 of the United States Code (USC) for the nine-county San Francisco Bay Area region (the region); and

WHEREAS, Title 23 Code of Federal Regulations Part 450 (23 CFR §450) requires the region to carry out a continuing, cooperative and comprehensive transportation planning process as a condition to the receipt of federal assistance to develop and update at least every four years, a Transportation Improvement Program (TIP) consisting of a comprehensive listing of transportation projects that receive federal funds, are subject to a federally required action, or are regionally significant; and

WHEREAS, Section 65074 of the California Government Code requires all state MPOs to update their TIPs concurrently every even year; and

WHEREAS, the TIP must be consistent with the Regional Transportation Plan (RTP) adopted pursuant to Government Code Section 66508, the State Implementation Plan (SIP) as required by the federal Clean Air Act (42 U.S.C. Section 7401 et seq.); and the San Francisco Bay Area Transportation Air Quality Conformity Protocol (MTC Resolution 3757, Revised), which establish the Air Quality Conformity Procedures for MTC's TIP and RTP; and

WHEREAS, federal regulations (23 CFR §450.326(k)) require that the TIP be financially constrained, by year, to reasonable estimates of available federal and state transportation funds; and

WHEREAS, federal regulations (23 CFR §450.326) require that the TIP be designed such that once implemented, it makes progress toward achieving the performance targets established under §450.306(d) and that the TIP shall include, to the maximum extent practicable, a description of the anticipated effect of the TIP toward achieving the performance targets identified in the metropolitan transportation plan, linking investment priorities to those performance targets; and

WHEREAS, federal regulations (23 CFR §450.316) require that the MPO develop and use a documented public participation plan that defines a process for providing citizens, affected public agencies and interested parties with reasonable opportunities to be involved in the metropolitan transportation planning process; and

WHEREAS, federal regulations (23 CFR §450.332(a)) allow MTC to move projects between years in the first four years of the TIP without a TIP amendment, if Expedited Project Selection Procedures (EPSP) are adopted to ensure such shifts are consistent with the required year by year financial constraints; and

WHEREAS, MTC, the State, and public transportation operators within the region have developed and implemented EPSP for the federal TIP as required by Federal Regulations (23 CFR 450.332(a)) and Section 134 of Title 23 United States Code (USC §134), as outlined in Attachment A to this Resolution, and MTC Resolution 3606, Revised; and

WHEREAS, MTC has found in MTC Resolution No. 4645 that the 2025 TIP, as set forth in this resolution, conforms to the applicable provisions of the SIP for the San Francisco Bay Area; and

WHEREAS, the San Francisco Bay Area air basin was designated by U.S. Environmental Protection Agency as nonattainment for the fine particulate matter (PM2.5) standard in December 2009, and MTC must demonstrate conformance to this standard through an interim emissions test until a PM2.5 SIP is approved by the federal Environmental Protection Agency (U.S. EPA); and

WHEREAS, federal regulations (23 CFR §667) encourage MPOs to consider evaluations of facilities repeatedly requiring repair and reconstruction due to emergency events when developing transportation plans and programs, including the TIP; now, therefore be it

RESOLVED, that MTC adopts the 2025 TIP, attached hereto as Attachment A and incorporated herein as though set forth at length; and be it further

RESOLVED, that MTC has developed the 2025 TIP in cooperation with the Bay Area County Transportation Agencies, transit operators, the Bay Area Air Quality Management District (BAAQMD), the California Department of Transportation (Caltrans), and other partner agencies and interested stakeholders, and in consultation with the Federal Highway Administration (FHWA), Federal Transit Administration (FTA), and U.S. EPA; and, be it further

RESOLVED, that the 2025 TIP was developed in accordance with the region's Public Participation Plan and consultation process (MTC Resolution No. 4590) as required by Federal Regulations (23 CFR §450.316); and, be it further

RESOLVED, that the projects and programs included in the 2025 TIP, attached hereto as Attachment A to this resolution, and incorporated herein as though set forth at length, are consistent with the RTP; and, be it further

RESOLVED, that the 2025 TIP is financially constrained, by year, to reasonable estimates of available federal, state, and local transportation funds; and, be it further

RESOLVED, that the 2025 TIP makes progress toward achieving the performance targets established under §450.306(d); and, be it further

RESOLVED, that MTC approves the EPSP developed by MTC, the State, and public transportation operators within the region for the federal TIP as required by federal regulations (23 CFR 450.332(a)) and Section 134 of Title 23 United States Code (USC §134), as outlined in Attachment A to this Resolution, and MTC Resolution 3606, Revised; and, be it further

RESOLVED, that MTC will support, where appropriate, efforts by project sponsors to obtain letters of no prejudice or full funding agreements from FTA for projects contained in the transit element of the TIP; and, be it further

RESOLVED, that the public participation process conducted for the 2025 TIP satisfies the public involvement requirements of the FTA annual Program of Projects; and, be it further

RESOLVED, that the adoption of the TIP shall not constitute MTC's review or approval of those projects included in the TIP pursuant to Government Code Sections 66518 and 66520, or provisions in federal regulations (49 CFR Part 17) regarding Intergovernmental Review of Federal Programs; and, be it further

RESOLVED, that MTC's review of projects contained in the TIP was accomplished in accordance with procedures and guidelines set forth in the San Francisco Bay Area Transportation Air Quality Conformity Protocol (MTC Resolution 3757, Revised); and, be it further

RESOLVED, that MTC finds that the 2025 TIP conforms to the applicable provisions of the State Implementation Plan (SIP) and the applicable transportation conformity budgets in the SIP approved for the national 8-hour ozone standard and to the emissions test for the national fine particulate matter standard (MTC Resolution No. 4645); and, be it further

RESOLVED, that the projects and programs included in the 2025 TIP do not interfere with the timely implementation of the traffic control measures (TCMs) contained in the SIP; and, be it further

RESOLVED, that MTC finds all regionally significant capacity-increasing projects included in the 2025 TIP are consistent with *Plan Bay Area 2050* (the Regional Transportation Plan including the Sustainable Communities Strategy for the San Francisco Bay Area) and, be it further

RESOLVED, that revisions to the 2025 TIP as set forth in Attachment B to this resolution and incorporated herein as though set forth at length, shall be made in accordance with rules and procedures established in the public participation plan and in MTC Resolution No. 4646, and that MTC's review of projects revised in the TIP shall be accomplished in accordance with procedures and guidelines set forth in the San Francisco Bay Area Transportation Air Quality Conformity Protocol (MTC Resolution 3757, Revised) and as otherwise adopted by MTC; and, be it further

RESOLVED, that staff have the authority to make technical corrections, and the Executive Director and Deputy Executive Directors have signature authority to approve administrative modifications for the TIP and Federal Statewide Transportation Improvement Program (FSTIP) under delegated authority by Caltrans, and to forward all required TIP amendments once approved by MTC to the appropriate state and federal agencies for review and approval; and, be it further

RESOLVED, that a copy of this resolution shall be made available upon request to FHWA, FTA, U.S. EPA, Caltrans, the Association of Bay Area Governments (ABAG), and to such other agencies and local officials as may be appropriate; and, be it further

RESOLVED, that projects in the TIP are consistent with 23 CFR §667 requirements and analysis.

METROPOLITAN TRANSPORTATION COMMISSION

Nick Josefowitz, Vice Chair

The above resolution was entered into by the
Metropolitan Transportation Commission
at a regular meeting of the Commission held in
San Francisco, California, on September 25, 2024.

Date: September 25, 2024
W.I.: 1512
Referred by: PAC
Revised: 12/18/24-C 01/22/25-C
02/26/25-C 03/26/25-C
04/23/25-C 05/28/25-C
06/25/25-C 07/23/25-C
09/10/25-C 09/24/25-C
10/22/25-C 02/25/26-C
03/25/26-C

Attachment B
Resolution No. 4646, Revised
Page 1

Revisions to the 2025 Transportation Improvement Program

Revisions to the 2025 Transportation Improvement Program (TIP) will be included as they are approved.

Revision 2025-01 is an amendment that adds or revises 96 projects with a net funding increase of approximately $1.8 billion. The revision was referred by the Programming and Allocations Committee on December 11, 2024 and approved by the MTC Commission on December 18, 2024. Caltrans approval was received on January 30, 2025 and final federal approval was received February 28, 2025. Among other changes, this revision:

- Adds three new projects and updates 23 existing projects to reflect changes in the One Bay Area Grant (OBAG) 2 and 3 programs and Carbon Reduction Program (CRP);
- Adds 17 new projects and updates seven existing projects to reflect changes in Community Project Funding/Congressionally Directed Spending (CPF/CDS), Safe Streets and Roads for All (SS4A), Charging and Fueling Infrastructure (CFI), Reconnecting Communities and Neighborhoods (RCN) Program, National Infrastructure Project Assistance Program (MEGA), and Reconnecting Communities Pilot (RCP) Program funds;
- Adds 18 new projects and updates 10 existing projects to reflect changes in the Transit Capital Priorities (TCP) program;
- Adds one project and updates seven existing projects to reflect changes in the State Transportation Improvement Program (STIP), Transit Intercity Rail Capital Program (TIRCP), and other locally funded projects; and
- Archives and deletes six projects that have either been completed or will not move forward as federal projects at this time.

Changes made with this revision do not affect the air quality conformity finding or conflict with financial constraint requirements.

Revision 2025-02 is an administrative modification that revises 66 projects with a net funding increase of $145.4 million. The revision was approved into the Federal-Statewide TIP by the Chief Deputy Executive Director on December 31, 2024. Among other changes, this revision:

- Updates the funding plans of 37 regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) and Carbon Reduction Program (CRP) projects;
- Updates the funding plans of five individually-listed projects to reflect the latest programming decisions in the Transit Capital Priorities (TCP) Program;
- Updates the funding plans of five Community Project Funding/Congressionally Directed Spending (CPFCDS), Passenger Ferry Grant Program (PFGP), and Ferry Boat Program (FBD) projects; and
- Updates the funding plans and back-up Group Listings of the Highway Bridge Program (HBP), Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT), Transit Operating Systems (TOS) and Mobility Program, and State Highway Operation and Protection Program (SHOPP)-funded group listings to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $270,000 in CRP, $341,659 in Repurposed Earmark, $2.2 million in CPFCDS, $11.4 million in PFGP, $15 million in Safe Streets and Roads for All (SS4A), $24.7 million in Federal Railroad Administration – Consolidated Rail Infrastructure and Safety Improvements (FRA-CRISI) Program, $5.7 million in California State Transportation Agency (CalSTA) 2021 State Budget Act Grant, $400 million in Bridge Investment Program (BIP) Grant, $180,000 in (PROTECT), and $62.5 million in SHOPP funds. MTC's 2025 TIP, as revised with Revision No. 2025-02, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-03 is an amendment that adds or revises 24 projects with a net funding increase of approximately $647.1 million. The revision was referred by the Programming and Allocations Committee on January 8, 2025 and approved by the MTC Commission on January 22, 2025. Caltrans approval was received on February 12, 2025 and final federal approval was received February 28, 2025. Among other changes, this revision:

- Adds two new projects and updates two existing projects to reflect changes in the One Bay Area Grant (OBAG) 2 and 3 programs and Safe Streets and Roads for All (SS4A) program;
- Adds nine new projects and updates eight existing projects to reflect changes in the Transit Capital Priorities (TCP) program; and
- Adds Port of Oakland's Terminal Modernization Segments 1-4 project to 2025 TIP adding $102.3 million in Port and Freight Infrastructure Program (PFIP) and $36.3 million in Port Infrastructure and Development Program (PIDP) funds.

Changes made with this revision do not affect the air quality conformity finding or conflict with financial constraint requirements.

Revision 2025-04 is an administrative modification that revises 13 projects with a net funding increase of $12.4 million. The revision was approved into the Federal-Statewide TIP by the Chief Deputy Executive Director on February 10, 2025. Among other changes, this revision:

- Updates the funding plans of five regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) projects and one Transit Capital Priorities (TCP) Program project;
- Updates the funding plans of four Community Project Funding/Congressionally Directed Spending (CPFCDS), Safe Streets For all (SS4A), and Recreational Trails projects; and
- Updates the funding plan and back-up Group Listing for the Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) program to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $43,547 in Repurposed Earmark, $3.9 million in CPFCDS, $1.9 million in Senate Bill 1 Road Repair and Accountability Act Local Partnership Program Formula, and $13.5 million in Trade Corridor Enhancement Program funds. MTC's 2025 TIP, as revised with Revision No. 2025-04, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-05 is an amendment that adds or revises 20 projects with a net funding increase of $133.5 million. The revision was referred by the Programming and Allocations Committee on February 12, 2025, and approved by the MTC Commission on February 26, 2025. Caltrans approval was received on March 27, 2025 and final federal approval was received March 28, 2025. Among other changes, this revision:

- Adds 15 new projects and updates two existing projects to the Transit Capital Priorities (TCP) program; and
- Updates Caltrans Rio Vista SR12 Pavement Rehab and Intersection Improvements project to reflect the latest information from Caltrans State Highway Operation and Protection Program (SHOPP).

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-06 is an administrative modification that revises 14 projects with a net funding increase of $7.1 million. The revision was approved into the Federal-Statewide TIP by the Chief Deputy Executive Director on March 19, 2025. Among other changes, this revision:

- Updates the funding plan of one regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) project and eight Transit Capital Priorities (TCP) Program projects; and
- Updates the funding plan of the Water Emergency Transportation Authority's (WETA) Ferry Major Component Rehabilitation/Replacement project to reprogram Earmark and Ferry Boat Discretionary funds.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $2.1 million in Repurposed Earmark and $2.9 million in Ferry Boat Discretionary funds. MTC's 2025 TIP, as revised with Revision No. 2025-06, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-07 is an amendment that adds or revises 17 projects with a net funding increase of $125.7 million. The revision was referred by the Programming and Allocations Committee on March 12, 2025, and approved by the MTC Commission on March 26, 2025. Caltrans approval was received on May 8, 2025 and final federal approval was received May 9, 2025. Among other changes, this revision:

- Adds two new projects and updates one existing project with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) and Carbon Reduction Program (CRP) funds;
- Adds two new projects and updates six existing projects to the Transit Capital Priorities (TCP) program; and
- Adds six new projects with Safe Streets for All (SS4A), Community Project Funding/Congressionally Directed Spending (CPFCDS), Rebuilding American Infrastructure with Sustainability and Equity (RAISE); and Innovative Finance and Asset Concession Grant Program (IFACGP) funds.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-08 is an administrative modification that revises 16 projects with a net funding increase of $244.4 million. The revision was approved into the Federal-Statewide TIP by the Deputy Executive Director on April 9, 2025. Among other changes, this revision:

- Updates the funding plans of three regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) project and two individually-listed Transit Capital Priorities (TCP) Program projects;
- Updates the funding plan of one Community Project Funding/Congressionally Directed Spending (CPFCDS) project;
- Updates the funding plans and back-up Group Listings of MTC's Transit Operating Assistance, Transit Preventative Maintenance, and FTA 5311 Rural Area FY21-24 programs; and
- Updates the funding plans and back-up Group Listings of the Highway Safety Improvement Program (HSIP), Highway Bridge Program (HBP), Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT) program, and four State Highway Operation and Protection Program (SHOPP)-funded group listings to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $30.5 million in HSIP, $149.3 million in SHOPP, and

$9.3 million in FTA's Section 5339 Discretionary funds. MTC's 2025 TIP, as revised with Revision No. 2025-08, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-09 is an amendment that adds or revises 13 projects with a net funding increase of $148.3 million. The revision was referred by the Programming and Allocations Committee on April 9, 2025, and approved by the MTC Commission on April 23, 2025. Caltrans approval was received on May 22, 2025 and final federal approval was received May 23, 2025. Among other changes, this revision:

- Adds one new project and updates four existing projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) and Transit Capital Priorities (TCP) program funds;
- Adds three new projects and updates two existing projects with Community Project Funding/Congressionally Directed Spending (CPFCDS), Infrastructure for Rebuilding America (INFRA), and Ferry Boat Discretionary (FBD) program funds; and
- Adds Port of Oakland's Arterial Roadway Improvements (Segment 1 & 2) project with Port and Freight Infrastructure Program (PFIP) funds.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-10 is an administrative modification that revises 23 projects with a net funding decrease of $193.2 million. The revision was approved into the Federal-Statewide TIP by the Deputy Executive Director on May 9, 2025. Among other changes, this revision.

- Updates the funding plans of five regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ), Carbon Reduction Program (CRP), and Active Transportation Program (ATP) projects;
- Updates the funding plans of eight individually-listed projects and two Group Listings to reflect the latest programming decisions in the Transit Capital Priorities (TCP) Program;
- Updates Golden Gate Bridge, Highway and Transit District's (GGBHTD) Replacement Ferry California Air Resources Board (CARB) Compliance project to reprogram $6 million in Passenger Ferry Grant Program (PFGP) funds to the GGBHTD Fixed Guideway Connector's project; and
- Updates the funding plans and back-up Group Listings of the Recreational Trails Program and Railroad-Highway Crossing programs to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $5.7 million in ATP, $1.7 million in Recreational Trails Program, and $1.9 million in Railroad-Highway Crossing funds. MTC's 2025 TIP, as revised with Revision No. 2025-10, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-11 is an amendment that adds or revises 8 projects with a net funding increase of $175.7 million. The revision was referred by the Programming and Allocations Committee on May 14, 2025, and approved by the MTC Commission on May 28, 2025. Caltrans approval was received on July 17, 2025 and final federal approval was received July 18, 2025. Among other changes, this revision:

- Adds three new projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) and Transit Capital Priorities (TCP) program funds; and
- Adds four new projects with Community Project Funding/Congressionally Directed Spending (CPFCDS) and regional Carbon Reduction Program (CRP) funds.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-12 is an administrative modification that revises 41 projects with a net increase in funding of $21.4 million. The revision was approved into the Federal-Statewide TIP by the Deputy Executive Director on June 9, 2025. Among other changes, this revision.

- Updates the funding plans of four regional Surface Transportation Block Grant Program (STP) projects;
- Updates the funding plans of 30 individually-listed projects and three Group Listings to reflect the latest programming decisions in the Transit Capital Priorities (TCP) Program;
- Updates the funding plans of three Community Project Funding/Congressionally Directed Spending (CPFCDS) projects; and
- Updates Golden Gate Bridge, Highway and Transit District's (GGBHTD) Golden Gate Bridge Seismic Retrofit, Phase 3B project to change the fund source of Regional Transportation – Long Range Plan (RTP-LRP) funds to Highway Bridge Program (HBP) funds.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $2.5 million in Ferry Boat Program and $128.9 million in HBP funds. MTC's 2025 TIP, as revised with Revision No. 2025-12, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-13 is an amendment that adds or revises 25 projects with a net funding increase of $592.6 million. The revision was referred by the Programming and Allocations Committee on June 11, 2025, and approved by the MTC Commission on June 25, 2025. Caltrans approval was received on July 18, 2025 and final federal approval was received July 18, 2025. Among other changes, this revision:

- Adds eight new projects and updates four existing projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement

Program (STP/CMAQ), Transit Capital Priorities (TCP), regional Carbon Reduction Program (CRP), and regional Active Transportation Program (ATP) funds;
- Adds six new projects and updates one existing project with Community Project Funding/Congressionally Directed Spending (CPFCDS), Passenger Ferry Grant Program (PFGP), and FTA Transit Oriented Development (TOD) Planning Grant funds;
- Adds two new projects and updates two existing locally funded projects; and
- $451.5 million of the funds being added to the TIP through this revision are future uncommitted funds (RTP-LRP), which are being revised by the project sponsors to reflect latest project cost estimates.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-14 is an administrative modification that revises 23 projects with a net increase in funding of $40.1 million. The revision was approved into the Federal-Statewide TIP by the Assistant Director, Funding, Policy, and Programs on June 20, 2025. Among other changes, this revision.

- Updates the funding plans of four regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) projects;
- Updates the funding plans of 11 individually-listed projects and two group listings to reflect the latest programming decisions in the Transit Capital Priorities (TCP) Program;
- Updates the funding plans of one Community Project Funding/Congressionally Directed Spending (CPFCDS) project and one Active Transportation Program project; and
- Updates the funding plans and back-up Group Listings of three State Highway Operation and Protection Program (SHOPP)-funded group listings and the FTA Section 5310 group listing to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $850,000 in CPFCDS, $9.9 million in Federal Transit Administration (FTA) Low or No Emission Grant Program, $16.4 million in FTA Section 5310 Enhanced Mobility of Seniors and Individuals with Disabilities Program, $8.5 million in FTA COVID Relief, $5.7 million in FTA General Funds, $2.6 million in Ferry Boat Program (FBP), $1.7 million in Transit and Intercity Rail Capital Program (TIRCP), and $6.4 million in SHOPP funds. MTC's 2025 TIP, as revised with Revision No. 2025-14, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-15 is an amendment that adds or revises 12 projects with a net funding increase of $93.2 million. The revision was referred by the Programming and Allocations Committee on July 9, 2025, and approved by the MTC Commission on July 23, 2025. Caltrans approval was received on August 14, 2025 and final federal approval was received August 15, 2025. Among other changes, this revision:

- Adds five new projects and updates four existing projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ), Transit Capital Priorities (TCP), and regional Carbon Reduction Program (CRP);
- Adds Pacifica's Resurfacing Sharp Park Priority Development Area new project with Community Project Funding/Congressionally Directed Spending (CPFCDS) funds;
- Adds Port of Oakland's Powering Progress: Electrification of Transport new project with Reduction of Truck Emissions at Port Facilities (RTEPF) funds; and
- Adds City of Oakland's 42nd and High Street I-880 Access Improvements locally-funded project.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-16 is an administrative modification that revises 11 projects with a net increase in funding of $6.5 million. The revision was approved into the Federal-Statewide TIP by the Deputy Executive Director on July 31, 2025. Among other changes, this revision.

- Updates the funding plans of seven regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) projects and one State Transportation Improvement Program (STIP) project;
- Updates the funding plans of one Rebuilding American Infrastructure with Sustainability and Equity (RAISE) project and one Community Project Funding/Congressionally Directed Spending (CPFCDS) project; and
- Updates the funding plan and back-up Group Listing of one State Highway Operation and Protection Program (SHOPP)-funded group listing to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amount of $11.7 million in SHOPP and $3.1 million in STIP funds. MTC's 2025 TIP, as revised with Revision No. 2025-16, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-17 is an administrative modification that revises 15 projects with a net increase in funding of $383.5 million. The revision approved into the Federal-Statewide TIP by the Deputy Executive Director on August 13, 2025. Among other changes, this revision:

- Updates the funding plans of four regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) projects;
- Updates the funding plans of three individually-listed projects and one group listing project in the Transit Capital Priorities (TCP) program;
- Updates the funding plans of one Safe Streets and Roads for All (SS4A) project and two Community Project Funding/Congressionally Directed Spending (CPFCDS) projects; and

- Updates the funding plans and back-up Group Listings of four State Highway Operation and Protection Program (SHOPP)-funded group listings to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amount $383.5 million in SHOPP funds. MTC's 2025 TIP, as revised with Revision No. 2025-17, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-18 is an amendment that revises three projects with a net funding increase of $986.7 million, including funds in prior and future years. The revision was referred by the Programming and Allocations Committee on September 10, 2025, and approved by the MTC Commission on September 10, 2025. Caltrans approval was received on September 12, 2025 and final federal approval was received September 15, 2025. This revision makes the following changes:

- Revises the scope and funding plan of two projects with FTA 5339 federal discretionary grants; and
- Revises the funding plan of the Golden Gate Bridge Seismic Retrofit Phase 3B project to add $993.6 million in Other Local funds.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-19 is an amendment that adds or revises 28 projects with a net funding increase of $124.1 million. The revision was referred by the Programming and Allocations Committee on September 10, 2025, and approved by the MTC Commission on September 24, 2025. Caltrans approval was received on October 10, 2025 and final federal approval was received October 17, 2025. Among other changes, this revision:

- Adds 15 new projects and updates three existing projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ), Transit Capital Priorities (TCP), and regional Carbon Reduction Program (CRP) funds;
- Adds two new projects and updates one existing project with Rebuilding American Infrastructure with Sustainability and Equity (RAISE), Community Project Funding/Congressionally Directed Spending (CPFCDS), and Railroad Crossing Elimination (RCE) program funds;
- Adds four new projects and updates one existing project with Active Transportation Program (ATP) funds; and
- Adds two new locally-funded projects.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-20 is an administrative modification that revises 63 projects with a net increase in funding of $1.49 billion. The revision approved into the Federal-Statewide TIP by the Deputy Executive Director on October 15, 2025. Among other changes, this revision:

- Updates the funding plans of 13 regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ) projects;
- Updates the funding plans of seven individually-listed projects and four group listing projects in the Transit Capital Priorities (TCP) program;
- Updates the funding plans of 11 Safe Streets and Roads for All (SS4A), Rebuilding American Infrastructure and Sustainability and Equity (RAISE), and Community Project Funding/Congressionally Directed Spending (CPFCDS) projects;
- Updates the funding plans of five Active Transportation Program (ATP), Trade Corridor Enhancement Program (TCEP), State Transportation Improvement Program (STIP), and the funding plans of one individually-listed and back-up Group Listings of eight State Highway Operation and Protection Program (SHOPP) and Federal Lands Highway Program – Tribal Transportation Program (FLHP-TTP) funded projects to reflect the latest information from Caltrans; and
- Updates the funding plans of 12 locally-funded projects.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amount of $8.3 million in CRP, $35,779 in Repurposed Earmark, $814,953 in an High Priority Projects (HPP) Earmark, $200,000 in CPFCDS, $9.1 million in SS4A, $2.9 million in Ferry Boat Program, $64.1 million in FLHP, $2.1 million in TTP, $11 million in STIP, $1.8 million in Senate Bill 1 Local Partnership Program (SB1-LPP), $30 million in SB1-TCEP, and $1.25 billion in SHOPP funds. MTC's 2025 TIP, as revised with Revision No. 2025-20, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-21 is an amendment that adds or revises 111 projects with a net funding increase of $2.74 billion. The revision was referred by the Programming and Allocations Committee on October 8, 2025, and approved by the MTC Commission on October 22, 2025. Caltrans approval was received on November 6, 2025 and final federal approval was received November 7, 2025. Among other changes, this revision:

- Adds 47 new projects and updates 27 existing projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Program (STP/CMAQ), Transit Capital Priorities (TCP), and regional Carbon Reduction Program (CRP) funds;
- Adds nine new projects and updates five existing projects with Rebuilding American Infrastructure with Sustainability and Equity (RAISE), Community Project Funding/Congressionally Directed Spending (CPFCDS), Safe Streets for All (SS4A), Promoting Resilient Operations for Transformative, Efficient, and Cost-saving Transportation (PROTECT), Maritime Administration (MARAD), Consolidated Rail Infrastructure and Safety Improvements (CRISI), Clean Ports Grant (CPG), and Strength Mobility and Revolutionizing Transportation (SMART) program funds;

- Adds two new projects and updates three existing projects with State Transportation Improvement Program (STIP), Trade Corridor Enhancement Program (TCEP), Solutions for Congested Corridors (SCCP), California State Transportation Agency (CalSTA), and Transit and Intercity Rail Capital Program (TIRCP) funds; and
- Adds 11 new projects and updates seven existing projects locally-funded projects.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-22 is an administrative modification that revises 54 projects with a net increase in funding of $66.4 million. The revision approved into the Federal-Statewide TIP by the Deputy Executive Director on November 17, 2025. Among other changes, this revision:

- Updates the funding plans of 34 individually-listed projects and one group listing project in the regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ);
- Updates the funding plans of nine individually-listed projects and one group listing project in the Transit Capital Priorities (TCP) program;
- Updates the funding plans of five Carbon Reduction Program (CRP) and Community Project Funding/Congressionally Directed Spending (CPFCDS) projects; and

- Updates the funding plans of four Active Transportation Program (ATP) and State Transportation Improvement Program (STIP) projects.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amount of $387,310 in 5311f Intercity Bus, $15 million in 5339(B) Buses and Bus Facilities Program (BBF), $2 million in Reconnecting Communities Initiative, $1.5 million in California State Arts Council Grant, and $2.7 million in Senate Bill 1 Local Partnership Program (SB1-LPP) funds. MTC's 2025 TIP, as revised with Revision No. 2025-22, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-23 is an administrative modification that revises 32 projects with a net increase in funding of $186.1 million. The revision approved into the Federal-Statewide TIP by the Deputy Executive Director on December 1, 2025. Among other changes, this revision:

- Updates the funding plans of three projects in the regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ);
- Updates the funding plans of 11 individually-listed and one group listing projects in the Transit Capital Priorities (TCP) program;
- Updates the funding plans, or project details, of eight Carbon Reduction Program (CRP), Safe Streets for All (SS4A), and Community Project Funding/Congressionally Directed Spending (CPFCDS) projects;
- Updates the funding plans, or project details, of three Active Transportation Program (ATP) and locally-funded projects; and

- Updates the funding plans of and back-up Group Listings of six State Highway Operation and Protection Program (SHOPP) and Highway Bridge Program (HBP) funded projects to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $323,902 in California Air Resources Board – Sustainable Transportation Equity Project (CARB-STEP), $500,000 in CPFCDS, $6.4 million in HBP, and $198.6 million in SHOPP funds. MTC's 2025 TIP, as revised with Revision No. 2025-23, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-24 is an administrative modification that revises 52 projects with a net increase in funding of $83.3 million. The revision approved into the Federal-Statewide TIP by the Deputy Executive Director on January 14, 2026. Among other changes, this revision:

- Updates the funding plans of 45 projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ), Transit Capital Priorities (TCP) program, or Carbon Reduction Program (CRP) funds;
- Updates the funding plans of three Rebuilding American Infrastructure with Sustainability and Equity (RAISE), and Community Project Funding/Congressionally Directed Spending (CPFCDS) projects;
- Updates the funding plans, or project details, of one Active Transportation Program (ATP) and one locally-funded projects; and
- Updates the funding plan and back-up listing of one State Highway Operation and Protection Program (SHOPP) and the Highway Safety Improvement Program (HSIP) program to reflect the latest information from Caltrans.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amounts of $750,000 in State Bond Rail, $5.1 million in Ferry Boat Program (FBP), $5.9 million in Passenger Ferry Grant Program (PFGP), $4.1 million in Low Carbon Transit Operations Program (LCTOP), $20.2 million in California State Transportation Agency (CalSTA), $22.1 million in FTA Low or No Emission Grant Program, $3 million in CRP, $690,200 in RAISE, and $78.9 million in SHOPP funds. MTC's 2025 TIP, as revised with Revision No. 2025-24, remains in conformity with the applicable State Implementation Plan (SIP) for air quality and the revision does not interfere with the timely implementation of the Transportation Control Measures contained in the SIP.

Revision 2025-25 is an administrative modification that revises 5 projects with zero net funding changes. The revision was approved into the Federal-Statewide TIP by the Deputy Executive Director on January 23, 2026. Among other changes, this revision:

- Updates the funding plans, or project details, of three projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ) and Transit Capital Priorities (TCP) program funds; and

- Updates the funding plans, or project details, of two Rebuilding American Infrastructure with Sustainability and Equity (RAISE) and Community Project Funding/Congressionally Directed Spending (CPFCDS) projects.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amount of $690,200 in California State Transportation Agency (CalSTA) funds.

Revision 2025-26 is an administrative modification that revises 24 projects with a net increase in funding of $35.2 million across all program years. The revision was approved into the Federal-Statewide TIP by the Deputy Executive Director on March 3, 2026. Among other changes, this revision:

- Updates the funding plans of 16 projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ), Transit Capital Priorities (TCP) program, and Carbon Reduction Program (CRP) funds;
- Updates the funding plans of five Community Project Funding/Congressionally Directed Spending (CPFCDS), Repurposed Earmarks, and Emergency Relief (ER) projects; and
- Updates the funding plans of three locally-funded projects.

The administrative modification is financially constrained by year and MTC relies on the State's programming capacity in the amount of $7.9 million in Federal Transit Administration (FTA) Low of No Emission Grant Program funds.

Revision 2025-27 is an amendment that adds or revises 6 projects with a net funding increase of $177.7 million. The revision was referred by the Programming and Allocations Committee on February 11, 2026, and approved by the MTC Commission on February 25, 2026. Caltrans approval is expected in March 2026, and final federal approval is expected in April 2026. Among other changes, this revision:

- Adds one new project and updates two existing projects with regional Transit Capital Priorities (TCP) funds;
- Updates the Santa Clara Valley Transportation Authority's Community Project Funding/Congressionally Directed Spending (CPFCDS) Spooky Knoll Trail project's funding plan and scope; and
- Updates Bay Area Raid Transit's (BART) Police Department Headquarters and Golden Gate Bridge, Highway and Transit District's (GGBHTD) Suspension Bridge Seismic Retrofit projects funding plans with local funds.

Changes made with this revision do not affect the air quality conformity finding or conflict with the financial constraint requirements.

Revision 2025-28 is an amendment that serves to conform the 2025 TIP to *Plan Bay Area 2050+* and revises four projects with a net funding increase of $11.2 million. The revision was referred by the Planning Committee on March 13, 2026, and approved by the MTC Commission

on March 25, 2026. Caltrans approval is expected in April 2026, and final federal approval is expected in May 2026. Among other changes, this revision:

- Updates the funding plans, or project details, of four projects with regional Surface Transportation Block Grant/Congestion Mitigation and Air Quality Improvement Programs (STP/CMAQ) funds.

Changes made with this revision do not conflict with the financial constraint requirements. The *Transportation-Air Quality Conformity Analysis for Plan Bay Area 2050+ and Amended 2025 TIP* demonstrates that the TIP and Plan are consistent with ("conform to") the federal air quality plan known as the State Implementation Plan (SIP), as required by conformity regulations.

TIP Revision Summary
2025-28

TIP ID	Sponsor	Project Name	Description of Change	Funding Change ($)	Funding Change (%)
System: Local Road					
ALA230203	Newark	Old Town Streetscape and Complete Streets	Update the funding plan to add $10.4M in RM3 and $1.4M in Other State (Caltrans Priority Legislative Budget Projects) funds. Also removed $3.7M in Local funds.	$8,151,000	82.2%
NAP250203	Napa County	NVVT Vista Carneros Project	Update the project scope and location to clarify limits	$0	0.0%
System: State Highway					
NAP170009	Napa (City)	Silverado Trail Five-Way Intersection Improvements	Update the project scope to reflect the updated activities	$0	0.0%
NAP230202	Napa Valley Transportation Authority	SR-29 American Canyon Operational & Multimodal Imp	Update the project scope to reflect CON activities and updated AQ Exemption. Also added $3M in RTP-LRP funds	$3,000,000	4.3%
			Total Funding Change:	$11,151,000	

TIP Revision Summary

	Federal	State	Regional	Local	Total	2025 TIP Only
Current:	$12,044,000	$4,855,000	$68,000	$99,594,000	$116,561,000	$42,388,000
Proposed:	$12,044,000	$6,292,000	$10,498,000	$98,878,000	$127,712,000	$50,049,000
Delta:	$0	$1,437,000	$10,430,000	-$716,000	$11,151,000	$7,661,000

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Alameda	Alameda (City)	Alameda Grand St Pavement Rehab and Safety Imps	ALA170074	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Alameda	Alameda (City)	Alameda Public EV Charging Program	ALA250237	25-EN8-184	Clean Vehicle Initiatives | Regional
Alameda	Alameda (City)	Lincoln Ave/Marshall Way/Pacific Ave Corridor Imp	ALA250211	25-T09-134	Complete Streets Network | Regional
Alameda	Alameda (City)	Oakland Alameda Estuary Bridge	ALA250215	25-T09-134	Complete Streets Network | Regional
Alameda	Alameda (City)	Oakland Alameda Water Shuttle	ALA250212	25-T01-001	Operate & Maintain the Existing System | Baseline | Public Transit Service Levels | Regional
Alameda	Alameda (City)	Willie Stargell Avenue Safety Improvements Project	ALA250244	25-T09-134	Complete Streets Network | Regional
Alameda	AC Transit	AC Transit: D4 Self Generation of Power	ALA250232	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	AC Transit	AC Transit: D6 Construct Hydrogen Fueling Infrastr	ALA230201	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	AC Transit: Paratransit Van Replacement	ALA990052	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	AC Transit	AC Transit: Purchase 10 35ft Battery Electric Buse	ALA250231	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	AC Transit: Purchase 10 40ft Zero-Emission Buses	ALA250216	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	AC Transit: Purchase 23 40ft Urban Buses	ALA230213	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	AC Transit	AC Transit: Purchase 24 40ft Urban Buses	ALA230217	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	AC Transit	AC Transit: Purchase 43 40ft Fuel Cell Buses	ALA250234	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	AC Transit: Purchase 50 40-ft Diesel Buses	ALA210012	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	AC Transit	AC Transit: Purchase 9 60ft Articulated Fuel Cell	ALA210011	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	AC Transit: Quick Builds Transit Lanes	ALA210018	25-T11-141	Rapid Bus | Modernization | AC Transit
Alameda	AC Transit	AC Transit: Rehabilitate Maintenance Bays for ZEBs	ALA230219	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	AC Transit: Training and Education Center (TEC)	ALA230209	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	AC Transit	Foothill Corridor Planning Study	ALA230212	25-T08-091	Planning/Program | Regional
Alameda	AC Transit	MacDonald Avenue Transit Signal Priority - Phase 1	ALA230211	25-T11-142	Local Bus | Service Frequency Upgrades | AC Transit | Systemwide
Alameda	AC Transit	Purchase 23 60ft Artic Fuel Cell Buses	ALA230218	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	AC Transit	Tempo Quick Build Transit Lane Delineation	ALA210017	25-T11-142	Local Bus | Service Frequency Upgrades | AC Transit | Systemwide
Alameda	Alameda County	ACPWA Safety Action Plan	ALA250201	25-T08-091	Planning/Program | Regional
Alameda	Alameda County	Alameda Co Unsignalized Intersection ImpsH9-04-001	ALA190011	25-T08-090	County Safety, Security and Other
Alameda	Alameda County	Alameda Co-Signalized Intersection Imps H9-04-002	ALA190012	25-T08-090	County Safety, Security and Other
Alameda	Alameda County	Alameda County Complete Street Improvements	ALA190019	25-T09-134	Complete Streets Network | Regional
Alameda	Alameda County	Alameda Co-Various Streets and Roads Preservation	ALA130018	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Alameda	Alameda County	Arroyo Rd Bridge Replacmnt HBP project	ALA170083	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Alameda	Alameda County	E14th St/Mission Blvd Corridor Improvements	ALA190022	25-T09-134	Complete Streets Network | Regional
Alameda	Alameda County	Fruitvale Ave Roadway Bridge Lifeline	ALA090023	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Alameda	Alameda County	H9-04-003 Alameda County Rural Roads Safety Imps	ALA190010	25-T08-090	County Safety, Security and Other
Alameda	Alameda County	H9-04-004 Tesla Road Safety Improvements	ALA190009	25-T08-090	County Safety, Security and Other
Alameda	Alameda County	Lower San Lorenzo Creekway Trail	ALA230224	25-T09-134	Complete Streets Network | Regional
Alameda	Alameda County	Niles Canyon Trail, Phase I	ALA190021	25-T09-134	Complete Streets Network | Regional
Alameda	Alameda County	Upper San Lorenzo Creekway Trail	ALA230205	25-T09-134	Complete Streets Network | Regional
Alameda	ACTC	7th Street Grade Separation West	ALA170086	25-T08-089	Goods Movement Improvements | Regional
Alameda	ACTC	Alameda County Safe Routes to Schools	ALA110033	25-EN9-185	Transportation Demand Management Initiatives | Regional
Alameda	ACTC	East Bay Greenway MM Phase 1 Hayward	ALA250214	25-T09-134	Complete Streets Network | Regional
Alameda	ACTC	East Bay Greenway Phase 2	ALA150008	25-T09-134	Complete Streets Network | Regional
Alameda	ACTC	I-580 Express Lanes Toll System Replacement	ALA250253	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Alameda	ACTC	I-680 Express Lanes from SR84 to Alcosta Boulevard	ALA170009	25-T07-074	Express Lane | New Lane | I-680 (NB) | Between SR-84 and Alcosta Blvd
Alameda	ACTC	I-80 Gilman Interchange Improvements	ALA050079	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Alameda	ACTC	I-80/Ashby Avenue Interchange Improvements	ALA170002	25-T06-019	Interchange Improvements | I-80 | Ashby Ave
Alameda	ACTC	I-880/Whipple Rd Industrial Pkwy SW I/C Imps	ALA170005	25-T06-045	Interchange Improvements | I-880| Whipple Rd
Alameda	ACTC	Jackson Street Parallel Bike Improvements	ALA230233	25-T09-134	Complete Streets Network | Regional
Alameda	ACTC	Rail Safety Enhancement Program: Phase A (RSEP-A)	ALA210022	25-T08-089	Goods Movement Improvements | Regional
Alameda	ACTC	San Pablo Ave Parallel Bike Improvements	ALA230010	25-T09-134	Complete Streets Network | Regional
Alameda	ACTC	San Pablo Ave Safety Enhancements Improvements	ALA230009	25-T09-134	Complete Streets Network | Regional
Alameda	ACTC	San Pablo Avenue Bus/Bike Lanes	ALA230008	25-T11-143	Rapid Bus | Modernization | AC Transit | San Pablo Ave
Alameda	ACTC	State Route 262 (Mission Blvd) Improvements	ALA170001	25-T06-036	Interchange Improvements | I-680 | SR-262 ("Mission Blvd")
Alameda	Albany	San Pablo Ave and Buchanan St Pedestrian Imps.	ALA170088	25-T09-134	Complete Streets Network | Regional
Alameda	ACE	ACE Capital Access Fee	ALA210008	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	ACE	ACE Fixed Guideway (Capitalized Maintenance)	ALA170048	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	ACE	ACE Platform Extensions	ALA170042	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Alameda	ACE	ACE Revenue Vehicle Communication Equipment	ALA210009	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	ACE	ACE Track Improvements.	ALA010056	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	ACE	ACE: Railcar Midlife Overhaul	ALA170079	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	BART	BART Police Department Headquarters Project	ALA230234	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	BART	BART: Fare Collection Equipment	ALA090065	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	BART	DT Berkeley BART Station Elevator Modernization	ALA230001	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Alameda	BART	Dublin/Pleasanton Access Improvements	ALA230215	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Alameda	BART	Hayward Fleet Maintenance Facilities	ALA230005	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	Berkeley	Addison Street Bicycle Boulevard Extension	ALA230207	25-T09-134	Complete Streets Network | Regional
Alameda	Berkeley	I-80 and Aquatic Park Lagoon Subsurface Culvert	ALA250252	25-EN1-183	Sea Level Rise Adaptation Infrastructure | Regional
Alameda	Berkeley	San Pablo Ave. and Ashby Ave. Intersection Imp.	ALA250241	25-T10-135	Speed Limit Reductions Initiatives| Regional
Alameda	Berkeley	Southside Complete Streets and Transit Improvement	ALA170067	25-T09-134	Complete Streets Network | Regional
Alameda	Berkeley	Southwest Berkeley Bike Boulevards	ALA250243	25-T09-134	Complete Streets Network | Regional
Alameda	Berkeley	Washington Elementary and Berkeley High SR2S	ALA230208	25-T09-134	Complete Streets Network | Regional
Alameda	Caltrans	Arroyo de la Laguna Bridge Rehab - 33-0043	ALA190017	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Alameda	Caltrans	GL: Alameda and Marin Counties - TOS-Mobility	ALA170060	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Alameda	Caltrans	Vision 980 Study (Phase 2)	ALA250227	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Alameda	Capitol Corridor Joint Powers Authority	CCJPA SR84 Intermodal Bus Facility	ALA210033	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Alameda	Dublin	Dublin Blvd. - North Canyons Pkwy Extension	ALA150003	25-T08-096	Roadway Extension | Dublin Blvd- N Canyons Pkwy | Between Fallon Rd and Doolan Rd
Alameda	Dublin	I-580 Interchange Imps at Hacienda/Fallon Rd, Ph 2	ALA170045	25-T06-033	Interchange Improvements | I-580 | Hacienda Dr and Fallon Rd, Phase 2
Alameda	Dublin	Tassajara Road Widening	ALA210026	25-T08-095	Roadway Widening | Tassajara Rd | Between N Dublin Ranch Dr and Quarry Ln School/Rutherford Dr
Alameda	Dublin	Village Parkway Complete Streets Improvements	ALA230227	25-T09-134	Complete Streets Network | Regional
Alameda	Emeryville	40th Street Transit and Multi-Modal Enhancements	ALA210029	25-T09-134	Complete Streets Network | Regional
Alameda	Emeryville	The Emeryville Loop	ALA250217	25-T09-134	Complete Streets Network | Regional
Alameda	Fremont	East Bay Greenway (Irvington to Fremont BART)	ALA230221	25-T09-134	Complete Streets Network | Regional
Alameda	Fremont	Fremont Blvd/Walnut Ave Protected Intersection	ALA210014	25-T09-134	Complete Streets Network | Regional
Alameda	Fremont	Fremont Blvd-Grimmer Blvd Protected Intersection	ALA210015	25-T09-134	Complete Streets Network | Regional
Alameda	Fremont	I-880/Decoto Road Interchange Modernization	ALA230002	25-T06-042	Interchange Improvements | I-880| Decoto Rd
Alameda	Fremont	Sabercat Trail: Irvington BART to Ohlone College	ALA210019	25-T09-134	Complete Streets Network | Regional
Alameda	Hayward	Hayward - Main Street Complete Street	ALA170065	25-T09-134	Complete Streets Network | Regional
Alameda	Hayward	High Injury Network Supplemental Planning	ALA250205	25-T08-091	Planning/Program | Regional
Alameda	Hayward	I-880 Auxiliary lanes at Industrial Parkway	ALA090020	25-T07-076	Auxiliary Lane | New Lane | I-880 | Between Industrial Parkway and Alameda Creek
Alameda	Hayward	I-880 I/C Improvements (Winton Ave and A St)	ALA170046	25-T06-047	Interchange Improvements | I-880 | Between Winton Ave and A St
Alameda	Hayward	I-880/Industrial Parkway West Interchange	ALA110002	25-T06-043	Interchange Improvements | I-880 | Industrial Pkwy West
Alameda	Hayward	Rt 92/Clawiter/Whitesell Interchange Improvements	ALA090016	25-T06-068	Interchange Improvements | SR-92| Clawiter Rd/Whitesell St
Alameda	Hayward	Streetlight Conversion to LEDs	ALA250251	25-T09-134	Complete Streets Network | Regional
Alameda	Hayward	Tennyson Road Neighborhood Improvements	ALA250207	25-T10-135	Speed Limit Reductions Initiatives| Regional
Alameda	Livermore	Airway Blvd Bridge BR 33C019 at Arroyo Las Positas	ALA250213	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Alameda	Livermore	Arroyo Road Trail Project	ALA250249	25-T09-134	Complete Streets Network | Regional
Alameda	Livermore	Bluebell Drive Bridge at Altamont Creek 33C0192, 2	ALA250221	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Alameda	Livermore	Bluebell Drive Bridge at Arroyo Las Positas 202426	ALA250218	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Alameda	Livermore	Citywide Systematic Safety Enhancement Project	ALA250229	25-T10-135	Speed Limit Reductions Initiatives| Regional
Alameda	Livermore	East Avenue Corridor ATP Implementation 202222	ALA250202	25-T09-134	Complete Streets Network | Regional
Alameda	Livermore	Greenville Road/I-580 Interchange 199149	ALA250210	25-T06-032	Interchange Improvements | I-580 | Greenville Rd
Alameda	Livermore	Heather Lane Bridge COLV005 at Arroyo Las Positas	ALA250220	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Alameda	Livermore	Holmes Street Bridge 33C0426 at Arroyo Mocho, 2024	ALA250224	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Alameda	Livermore	Isabel Ave and Portola Ave I-580 Interchange 20233	ALA250225	25-T06-034	Interchange Improvements | I-580 | Isabel Ave and Portola Ave
Alameda	Livermore	Stanley Blvd at Isabel Connector Ramp 202133	ALA250226	25-T08-093	Minor Roadway Improvements | Regional
Alameda	LAVTA	AVLs for Replacement Vehicles	ALA230228	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	LAVTA and CCCTA Hydrogen Fueling Stations	ALA230202	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	LAVTA	LAVTA Atlantis Facility	ALA230226	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	LAVTA Bus Bay Rehabilitation	ALA230214	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	LAVTA Hydrogen Fueling Station Expansion Project	ALA250228	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	LAVTA	LAVTA Rutan Facility Rehab. and Modernization	ALA250254	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	LAVTA: Purchase Fareboxes	ALA230229	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	LAVTA: Radios	ALA230232	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	Replace (4) 40' and (4) 35' Buses-Hybrid	ALA230230	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	LAVTA	Replace (4) 40' Buses-Fuel Cell	ALA230231	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	MTC	Bay Bridge Forward - West Grand HOV/Bus Only Lane	ALA170011	25-T06-017	Bay Area Forward Program | Regional
Alameda	MTC	Bay Bridge Forward I-80/ Powell I/C Transit Access	ALA210027	25-T06-017	Bay Area Forward Program | Regional
Alameda	MTC	Bay Bridge Forward: Alameda I-580 WB HOV Lane Ext	ALA190018	25-T06-017	Bay Area Forward Program | Regional
Alameda	MTC	Bay Bridge Forward: I-580 WB to I-80 EB Connector	ALA250248	25-T06-017	Bay Area Forward Program | Regional
Alameda	MTC	Bay Bridge Forward: I-80 EB HOV Connector Bus lane	ALA250247	25-T06-017	Bay Area Forward Program | Regional
Alameda	MTC	BBF: I-80 WB HOV/Bus Lane Extension	ALA210028	25-T06-017	Bay Area Forward Program | Regional
Alameda	MTC	I-880 Integrated Corridor Management - Central	ALA170057	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Alameda	MTC	Marshland Road Bay Trail Project	ALA250230	25-T09-134	Complete Streets Network | Regional
Alameda	MTC	West Oakland Link	ALA130030	25-T09-134	Complete Streets Network | Regional
Alameda	Newark	Old Town Streetscape and Complete Streets	ALA230203	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	42nd Ave and High St I-880 Access Improvements	ALA250240	25-T06-046	Interchange Improvements | I-880 | Between 42nd St and High St
Alameda	Oakland	73rd Ave Active Connections to Transit	ALA210025	25-T10-135	Speed Limit Reductions Initiatives| Regional
Alameda	Oakland	Bancroft Avenue Greenway	ALA230216	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	East Oakland Neighborhood Bike Routes	ALA210002	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	Foothill Blvd & MacArthur Blvd Pedestrian Safety	ALA190007	25-T08-090	County Safety, Security and Other
Alameda	Oakland	Fruitvale Alive Bike/Ped Gap Closure	ALA170051	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	I-580/Golf Links Road/98th Avenue Ramps Imp.	ALA250242	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Alameda	Oakland	Lake Merritt to Bay Trail Bike/Ped Bridge	ALA130003	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	Lakeside Family Streets	ALA170063	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	LAMMPS Phase 2 & 3 (Laurel Access to Mills+)	ALA250239	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	Oakland - 14th Street Safe Routes in the City	ALA170043	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	Oakland - Various Intersection Imprvmnts H9-04-022	ALA190008	25-T08-090	County Safety, Security and Other
Alameda	Oakland	Oakland 7th Street Connection Improvements	ALA210001	25-T09-134	Complete Streets Network | Regional
Alameda	Oakland	Oakland Grand Avenue Roadway Improvements	ALA210024	25-T08-099	Roadway Improvements | Grand Ave | Between MacArthur Blvd and Mandela Pkwy
Alameda	Oakland	OakPARK+	ALA230223	25-EN9-185	Transportation Demand Management Initiatives | Regional
Alameda	Oakland	Reconnecting the Town (MLK Jr. Way and 7th St)	ALA250255	25-T11-141	Rapid Bus | Modernization | AC Transit
Alameda	Oakland	Reconnecting the Town (RAISE)	ALA230006	25-T11-141	Rapid Bus | Modernization | AC Transit
Alameda	Oakland	West Oakland Howard Terminal Downtown Connectivity	ALA210023	25-T09-134	Complete Streets Network | Regional
Alameda	Pleasanton	I-680/Sunol Interchange Improvements	ALA190020	25-T06-037	Interchange Improvements | I-680| Sunol Blvd
Alameda	Pleasanton	West Las Positas Blvd Multimodal Reconstruction	ALA210032	25-T10-135	Speed Limit Reductions Initiatives| Regional
Alameda	Port of Oakland	Arterial Roadway Improvements (Segment 1 & 2)	ALA250236	25-T08-093	Minor Roadway Improvements | Regional
Alameda	Port of Oakland	Port of Oakland Green Power Microgrid	ALA250222	25-T08-089	Goods Movement Improvements | Regional
Alameda	Port of Oakland	Powering Progress: Electrification of Transport	ALA250238	25-T08-089	Goods Movement Improvements | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Alameda	Port of Oakland	Terminal Modernization Segments 1-4	ALA250235	25-T08-089	Goods Movement Improvements | Regional
Alameda	San Leandro	Dutton Ave Roadway Reconstruction	ALA250204	25-T09-134	Complete Streets Network | Regional
Alameda	San Leandro	Lake Chabot Road Erosion Repair	ALA250206	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Alameda	San Leandro	Lake Chabot Road Stabilization	ALA250223	25-T09-134	Complete Streets Network | Regional
Alameda	San Leandro	Lewelling Boulevard Class IV Bikeways	ALA250246	25-T09-134	Complete Streets Network | Regional
Alameda	San Leandro	MacArthur Blvd/Superior Ave Roundabout	ALA250203	25-T09-134	Complete Streets Network | Regional
Alameda	San Leandro	SR 185- E. 14th St/ Hesperian Blvd/150th Ave	ALA050002	25-T08-093	Minor Roadway Improvements | Regional
Alameda	San Leandro	Wicks Blvd / Manor Blvd Intersection Improvements	ALA190013	25-T08-090	County Safety, Security and Other
Alameda	Tri-Valley – San Joaquin Valley Regional Rail Authority	Valley Link Rail System (Phase 1)	ALA230204	25-T12-177	Rail | Service Expansion | Between San Joaquin County and Dublin/Pleasanton ("Valley Link")
Alameda	Union City	East-West Connector: Decoto and Quarry Lakes Pkwy	ALA978004	25-T08-097	Roadway Widening and Extension | Quarry Lakes Pkwy | Between Paseo Padre Pkwy and SR-238 (Mission Blvd)
Alameda	Union City	Union City Station District Mobility Hub	ALA250250	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Alameda	Union City Transit	Replace 2 Gas Paratransit Vans with EV	ALA250245	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	Union City Transit	Union City Transit Bus Procurement	ALA190029	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Alameda	Union City Transit	Union City Transit EV Charging Infrastructure	ALA210201	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Alameda	Union City Transit	Union City Transit: COVID-19 Emergency Transit Ops	ALA190027	25-T01-001	Operate & Maintain the Existing System | Baseline | Public Transit Service Levels | Regional
Contra Costa	AC Transit	Cutting Blvd Transit Priority Project	CC-250234	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Contra Costa	Antioch	Antioch - L Street Pathway to Transit	CC-170035	25-T09-134	Complete Streets Network | Regional
Contra Costa	BATA	I-580 Richmond Parkway Interchange Operational Imp	CC-250230	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Contra Costa	BART	Concord BART Station Modernization	CC-170060	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	Brentwood	Brentwood Boulevard Widening - North (Phase I)	CC-070011	25-T08-102	Roadway Widening | Brentwood Blvd, Phase 2 | Between Havenwood Ave and Homecoming Wy
Contra Costa	Brentwood	Brentwood Boulevard Widening - North (Phase II)	CC-170015	25-T08-101	Roadway Widening | Brentwood Blvd, Phase 1 | Between Homecoming Wy and Lone Tree Wy
Contra Costa	Brentwood	Lone Tree Way Undercrossing	CC-070013	25-T08-104	Roadway Widening | Lone Tree Wy| Between O'Hara Ave and Brentwood Blvd
Contra Costa	Caltrans	Central Ave I-80 Undercrossing Ped/Bike Improve	CC-210011	25-T09-134	Complete Streets Network | Regional
Contra Costa	CCCTA	CCCTA - Replace 22' Vehicles	CC-230216	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	CCCTA - Replace 40' Buses	CC-230217	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	CCCTA - Replace Paratransit Vans	CC-230218	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	CCCTA - Transit Corridors Study	CC-230212	25-T12-176	Transit Studies and Project Development | Regional
Contra Costa	CCCTA	CCCTA Electric Bus Charging Infrastructure	CC-210201	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Contra Costa	CCCTA	CCCTA Replace (10) 40ft Urban Buses	CC-230236	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	Replace 10 40' Diesel Buses with New Diesel Buses	CC-250210	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	Replace 15 Cut-Away/Vans with 7-year Gas Cut-Aways	CC-250211	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	Replace 3 Cut-Away/Vans with New Minivans under 22	CC-250214	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	Replace 3 Minivans under 22' with New minivans	CC-250212	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	Replace 42 Cut-Away/Vans with 7-year Gas Cut-Aways	CC-250216	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	CCCTA	Replace 7 30' Diesel Buses with New Diesel Buses	CC-250213	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	Concord	Citywide Traffic System Upgrade Phase 2 Project	CC-250206	25-T08-093	Minor Roadway Improvements | Regional
Contra Costa	Concord	Concord Citywide Traffic System Update (H9-04-008)	CC-190006	25-T08-090	County Safety, Security and Other
Contra Costa	Concord	Concord Willow Pass Road Repaving SR2T	CC-170037	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Contra Costa	Concord	Downtown Concord Parking Technology Innovation	CC-250224	25-EN9-185	Transportation Demand Management Initiatives | Regional
Contra Costa	Concord	Downtown Corridors Bike/Pedestrian Improvements	CC-170050	25-T09-134	Complete Streets Network | Regional
Contra Costa	Concord	Galindo Street Multimodal Corridor Project	CC-230209	25-T09-134	Complete Streets Network | Regional
Contra Costa	Concord	SR 242 / Clayton Road Interchange Improvements	CC-070024	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Contra Costa	Concord	Willow Pass Road Bike Lane Connection	CC-230211	25-T09-134	Complete Streets Network | Regional
Contra Costa	Contra Costa County	Camino Tassajara Realignment, S of Windemere Pkwy	CC-170016	25-T08-106	Roadway Widening | Camino Tassajara Rd | Between Windemere Pkwy and the Alameda County Line
Contra Costa	Contra Costa County	CC County Bridge Preventative Maintenance Program	CC-190022	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Contra Costa County	EV-4-ALL	CC-230237	25-EN8-184	Clean Vehicle Initiatives | Regional
Contra Costa	Contra Costa County	H9-04-009 Kirker Pass Road Safety Improvements	CC-190003	25-T08-090	County Safety, Security and Other
Contra Costa	Contra Costa County	H9-04-010 Crockett Area Guardrail Upgrades	CC-190004	25-T08-090	County Safety, Security and Other
Contra Costa	Contra Costa County	Kirker Pass Road Southbound Truck Climbing Lane	CC-250204	25-T10-135	Speed Limit Reductions Initiatives| Regional
Contra Costa	Contra Costa County	Marsh Creek Rd Bridge Replacements 28C0143 28C0145	CC-170063	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Contra Costa County	Marsh Dr Bridge 28c0442 over WC Channel Replacemnt	CC-190008	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Contra Costa County	North Bailey Road Active Transportation Corridor	CC-210001	25-T09-134	Complete Streets Network | Regional
Contra Costa	Contra Costa County	Pacheco Boulevard Improvements	CC-250205	25-T09-134	Complete Streets Network | Regional
Contra Costa	Contra Costa County	Pacifica Avenue Safe Routes to School	CC-230214	25-T09-134	Complete Streets Network | Regional
Contra Costa	Contra Costa County	Pleasant Hill Road Overcrossing Bridge Rehab	CC-190016	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Contra Costa County	San Pablo Ave Complete Streets/Bay Trail Gap Closu	CC-230213	25-T09-134	Complete Streets Network | Regional
Contra Costa	Contra Costa County	Vasco Road Safety Improvements	CC-050030	25-T08-093	Minor Roadway Improvements | Regional
Contra Costa	Contra Costa County	Verde K-8 Safe Routes to School	CC-250226	25-T09-134	Complete Streets Network | Regional
Contra Costa	CCTA	Antioch Bike Garden	CC-230230	25-T08-090	Other Locally IdentifiedImprovements | Regional
Contra Costa	CCTA	Bay Area MOD	CC-190018	25-EN9-185	Transportation Demand Management Initiatives | Regional
Contra Costa	CCTA	Bollinger Canyon Rd Shared Mobility Hub	CC-230229	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	CCTA	CCTA - Countywide Smart Signals	CC-230202	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Contra Costa	CCTA	Concord Smart Signals Project	CC-230227	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Contra Costa	CCTA	Contra Costa Countywide Safe Routes to School	CC-230208	25-T10-135	Speed Limit Reductions Initiatives| Regional
Contra Costa	CCTA	East Bay Integrated Transit Plan	CC-210012	25-T12-176	Transit Studies and Project Development | Regional
Contra Costa	CCTA	I-680 NB Express Lane Completion	CC-170017	25-T07-075	Express Lane | HOV Conversion/New Lane | I-680 (NB)| Between Livorna Rd and Arthur Rd
Contra Costa	CCTA	I-680 Part Time Transit Lane	CC-170061	25-T11-144	Express Bus | Service Expansion | I-680 | Between Martinez and San Jose
Contra Costa	CCTA	I-680/SR 4 I/C Reconstruction - Ph 2a,4	CC-010023	25-T06-040	Interchange Improvements | I-680| SR-4, Phases 1, 2a, 4
Contra Costa	CCTA	Innovate 680-Walnut Creek BART Shared Mobility Hub	CC-250220	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	CCTA	Innovate680:Coordinated Adaptive Ramp Metering Ph1	CC-170062	25-T06-040	Interchange Improvements | I-680| SR-4, Phases 1, 2a, 4
Contra Costa	CCTA	L Street Pathway to Transit – Bicycle and Pedestri	CC-230231	25-T09-134	Complete Streets Network | Regional
Contra Costa	CCTA	Martinez Amtrak Shared Mobility Hub	CC-230220	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	CCTA	Moraga Road and Canyon Road Complete Streets	CC-230234	25-T09-134	Complete Streets Network | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Contra Costa	CCTA	Reconstruct I-80/San Pablo Dam Rd Interchange Phas	CC-070035	25-T06-021	Interchange Improvements | I-80 | San Pablo Dam Rd, Phase 2
Contra Costa	CCTA	Richmond Street Complete Streets Improvement	CC-230233	25-T09-134	Complete Streets Network | Regional
Contra Costa	CCTA	SF Bay Trail Gap Closure: Martinez Intermodal Stat	CC-230232	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Contra Costa	CCTA	SR 239 - New State Highway Study	CC-110066	25-T07-072	Other Freeway/Highway Expansion Project Development Reserve | Regional
Contra Costa	CCTA	SR 4 Integrated Corridor Management	CC-150013	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Contra Costa	CCTA	SR-4 Operational Improvements - Initial Phases	CC-170018	25-T07-080	Auxiliary Lane | New Lane | SR-4 (EB) | Between Port Chicago Hwy and Willow Pass Rd
Contra Costa	EBRPD	SF Bay Trail Point Molate	CC-190019	25-T09-134	Complete Streets Network | Regional
Contra Costa	ECCTA	ECCTA 25 Diesel Bus Replacement	CC-250227	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	ECCTA	ECCTA Facility Replacement and Modernization	CC-250235	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	ECCTA	ECCTA: 10 DR Bus Replacement	CC-250223	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	ECCTA	ECCTA: Battery Electric Charging Upgrade	CC-250215	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Contra Costa	ECCTA	ECCTA: Bus Fueling Station	CC-210017	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	ECCTA	ECCTA: Transit Bus Replacements	CC-070092	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Contra Costa	El Cerrito	El Cerrito BART to Bay Trail Connection	CC-250202	25-T09-134	Complete Streets Network | Regional
Contra Costa	Hercules	Hercules Intercity Rail Station	CC-030002	25-T11-170	Rail | Service Expansion | Capitol Corridor | Hercules Station ("Hercules Hub")
Contra Costa	Lafayette	Connecting Lafayette: Downtown Pathways and School	CC-230210	25-T09-134	Complete Streets Network | Regional
Contra Costa	Lafayette	Lafayette Town Center Pathway and Bike Station	CC-210004	25-T09-134	Complete Streets Network | Regional
Contra Costa	Martinez	Alhambra Avenue Downtown Resurfacing	CC-170059	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Contra Costa	Martinez	Downtown Martinez Parking Technology Upgrades	CC-230222	25-EN9-185	Transportation Demand Management Initiatives | Regional
Contra Costa	MTC	CC I-680 Adaptive Ramp Metering Implementation	CC-250228	25-T06-017	Bay Area Forward Program | Regional
Contra Costa	MTC	RSR Forward: ORT and I-580 WB HOV Lane	CC-210010	25-T06-017	Bay Area Forward Program | Regional
Contra Costa	Moraga	St. Mary's Road Multimodal Safety Improvement Proj	CC-250201	25-T09-134	Complete Streets Network | Regional
Contra Costa	Oakley	Civic Center Railroad Platform Park n Ride Complex	CC-170019	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	Oakley	Oakley Main St Bridge over CC Canal 28C0270	CC-190021	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Orinda	Lamorinda Smart Signal System Project	CC-230225	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Contra Costa	Pinole	Bay Trail Gap Closure at Tennent Avenue	CC-230207	25-T09-134	Complete Streets Network | Regional
Contra Costa	Pinole	Expanding Electric Vehicle Charging	CC-250221	25-EN8-184	Clean Vehicle Initiatives | Regional
Contra Costa	Pinole	Replace San Pablo Avenue OH Bridge No 28C0062	CC-170054	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Pittsburg	Pittsburg BART Pedestrian and Bicycle Connectivity	CC-170040	25-T09-134	Complete Streets Network | Regional
Contra Costa	Pittsburg	Pittsburg Center Smart City Pilot	CC-230219	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	Pittsburg	Pittsburg H9-04-025 Traffic Signal Improvements	CC-190005	25-T08-090	County Safety, Security and Other
Contra Costa	Pittsburg	Pittsburg's Delta de Anza Multimodal Trail Safety	CC-230203	25-T09-134	Complete Streets Network | Regional
Contra Costa	Pleasant Hill	Bridge Preventative Maintenance Prog, Five Bridges	CC-170055	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Richmond	Bayview to BART	CC-230205	25-T09-134	Complete Streets Network | Regional
Contra Costa	Richmond	Downtown Point Richmond Bike/Ped Connectivity	CC-250225	25-T09-134	Complete Streets Network | Regional
Contra Costa	Richmond	I-80/Central Avenue - Local Portion	CC-050076	25-T06-020	Interchange Improvements | I-80 | Central Ave
Contra Costa	Richmond	Neighborhood Complete Streets	CC-250233	25-T09-134	Complete Streets Network | Regional
Contra Costa	Richmond	Point Richmond Traffic Improvements	CC-250231	25-T08-093	Minor Roadway Improvements | Regional
Contra Costa	Richmond	Richmond - Highway Bridge Preventive Maintenance	CC-190009	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	Richmond	Richmond 13th Street Complete Streets Imps	CC-210007	25-T09-134	Complete Streets Network | Regional
Contra Costa	Richmond	Richmond Wellness Trail Phase II	CC-250232	25-T09-134	Complete Streets Network | Regional
Contra Costa	SJRRC	Oakley Station Platform	CC-190002	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	San Pablo	Broadway-El Portal Safe Routes Project	CC-230215	25-T09-134	Complete Streets Network | Regional
Contra Costa	San Pablo	Contra Costa College Mobility Hub Project	CC-250218	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Contra Costa	San Pablo	Giant Hwy over San Pablo Creek BPMP	CC-190020	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Contra Costa	San Pablo	Giant Road Pavement Rehabilitation	CC-170031	25-T09-134	Complete Streets Network | Regional
Contra Costa	San Pablo	Intersection Church/Willow, El Portal/Mission Bell	CC-190007	25-T08-090	County Safety, Security and Other
Contra Costa	San Pablo	San Pablo Avenue Bridge Replacement	CC-250219	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Contra Costa	San Ramon	Crow Canyon Iron Horse Trail Bike-Ped Crossing	CC-230228	25-T09-134	Complete Streets Network | Regional
Contra Costa	San Ramon	Crow Canyon Road (Alcosta to Indian Rice) Widening	CC-190001	25-T08-103	Roadway Widening | Crow Canyon Rd | Between Alcosta Blvd and Indian Rice Rd
Contra Costa	San Ramon	Iron Horse Trail Bike and Pedestrian Overcrossing	CC-170014	25-T09-134	Complete Streets Network | Regional
Contra Costa	Walnut Creek	Walnut Creek Safe Routes to School Infrastructure	CC-230206	25-T09-134	Complete Streets Network | Regional
Contra Costa	Walnut Creek	Walnut Creek SR2S Infrastructure Walnut Blvd, Cedr	CC-250229	25-T09-134	Complete Streets Network | Regional
Contra Costa	Walnut Creek	Walnut Creek-S Main St - Las Trampas CrBridge Rep	CC-190023	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Contra Costa	Walnut Creek	Ygnacio Valley Road Fiber Infrastructure	CC-230221	25-T08-088	Regional Communications and Incident Management Program | Regional
Contra Costa	WestCAT	WCCTA Hydrogen Fuel Cell Bus and Hydrogen Fueling	CC-250208	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Contra Costa	WestCAT	WestCat 45-foot Over the Road Coach Replacement	CC-210015	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Calif. Department of Parks and Recreation	Angel Island Public Ferry Docks Gangway System	MRN190012	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Caltrans	San Rafael - Manuel T. Freitas Pkwy ADA Imps.	MRN190018	25-T09-134	Complete Streets Network | Regional
Marin	Caltrans	SR-37 Sea Level Rise Mitigation - US 101 to SR-121	MRN190017	25-EN1-183	Sea Level Rise Adaptation Infrastructure | Regional
Marin	Corte Madera	Central Marin Regional Pathway Gap Closure	MRN230212	25-T09-134	Complete Streets Network | Regional
Marin	Corte Madera	Paradise Drive Complete Streets Project	MRN230204	25-T09-134	Complete Streets Network | Regional
Marin	Fairfax	Town of Fairfax BPMP	MRN190020	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Marin	GGBHTD	GGBHTD - Transit Systems Enhancements	MRN130015	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	GGBHTD	GGBHTD Ferry Major Components Rehab	MRN150014	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	GGBHTD	GGBHTD: Facilities Rehabilitation	MRN050025	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	GGBHTD	Golden Gate Bridge Seismic Retrofit, Ph: 1-3A	MRN970016	25-T01-006	Operate & Maintain the Existing System | Toll Bridges | Regional
Marin	GGBHTD	Golden Gate Bridge-Suicide Deterrent SafetyBarrier	MRN050019	25-T01-006	Operate & Maintain the Existing System | Toll Bridges | Regional
Marin	GGBHTD	Golden Gate Ferry: New Vessel	MRN190001	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	GGBHTD	Golden Gate Suspension Bridge Seismic Retrofit	MRN050018	25-T01-006	Operate & Maintain the Existing System | Toll Bridges | Regional
Marin	GGBHTD	Replace Paratransit Cutaways	MRN250206	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	GGBHTD	San Rafael Transit Center Relocation	MRN170013	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Marin	Marin County	Countywide Signal Upgrade Project (HSIP9-04-016)	MRN190008	25-T08-090	County Safety, Security and Other

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Marin	Marin County	E Sir Francis Drake Bikeway Gap Closure	MRN230210	25-T08-091	Planning/Program | Regional
Marin	Marin County	Marin City Pedestrian Crossing Improvements	MRN190015	25-T09-134	Complete Streets Network | Regional
Marin	Marin County	Marin Co-Upgrade Non-Standard Guardrails H9-04-017	MRN190007	25-T08-090	County Safety, Security and Other
Marin	Marin County	Mount Lassen Drive Bridge 27C0135	MRN190006	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Marin	Marin County	Nicasio Valley Road Bridge 27C0098	MRN190004	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Marin	Marin County	Sir Francis Drake Blvd Bridge - 27C0104	MRN190005	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Marin	Marin County Transit District	MCTD - Bus Stop Improvements	MRN210002	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Marin	Marin County Transit District	Fixed Route Maintenance and Operations Facility	MRN230209	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Hybrid Battery Refresh	MRN250201	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	MCTD - Transit Corridor Improvements	MRN230202	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Marin	Marin County Transit District	MCTD- Onboard Technology	MRN230211	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	MCTD ZEB Charging Infrastructure	MRN210201	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Marin	Marin County Transit District	MCTD: Replace Demand Response Vans	MRN210007	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	MCTD: Replace Paratransit Vehicles	MRN170003	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	MCTD: Replace Paratransit Vehicles with Vans	MRN170004	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Replace 1 30ft. Hybrid with 30ft. Hybrid	MRN250202	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Replace 22 Paratransit Vehicles	MRN250204	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Replace 4 Diesel XHF Vehicles with 30 ft. Buses	MRN250209	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Replace 5 30ft. Hybrid Buses	MRN250208	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Replace 5 buses with 5 - 40ft Hybrids	MRN250205	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	Replace 7 40ft. Hybrid buses	MRN250203	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Marin	Marin County Transit District	US101 Part Time Transit Lane	MRN230206	25-T11-150	Express Bus | Modernization | US- 101
Marin	Mill Valley	The Southern Marin Vehicle Charging Consortium	MRN250211	25-EN8-184	Clean Vehicle Initiatives | Regional
Marin	Novato	Novato Traffic, Bicycle & Pedestrian Improvements	MRN190010	25-T08-090	County Safety, Security and Other
Marin	San Anselmo	San Anselmo - Center Blvd Bridge Replace (27C0079)	MRN110032	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Marin	San Anselmo	San Anselmo Bridge Preventative Maintenance Progra	MRN190021	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Marin	San Rafael	Canal Neighborhood Active Transportation Enhanceme	MRN230207	25-T09-134	Complete Streets Network | Regional
Marin	San Rafael	Downtown San Rafael North-South Greenway	MRN250212	25-T09-134	Complete Streets Network | Regional
Marin	San Rafael	H9-04-030 Third Street Safety Improvements Project	MRN190009	25-T08-090	County Safety, Security and Other
Marin	San Rafael	San Rafael Canal Crossing	MRN230208	25-T09-134	Complete Streets Network | Regional
Marin	San Rafael	Southern Heights Bridge Replacement-27C0148	MRN170025	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Marin	Sausalito	Bridgeway Bike Lanes - Princess to Richardson	MRN230203	25-T09-134	Complete Streets Network | Regional
Marin	Sausalito	Sausalito Capital Parking Improvements	MRN250210	25-EN9-185	Transportation Demand Management Initiatives | Regional
Marin	Transportation Authority of Marin (TAM)	US 101 HOV Lanes - Marin-Sonoma Narrows (Marin)	MRN050034	25-T07-072	Other Freeway/Highway Expansion Project Development Reserve | Regional
Marin	Various Agencies	GL: Marin County - TOS-Mobility	MRN170018	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Napa	American Canyon	Eucalyptus Drive Realignment Complete Streets	NAP110029	25-T09-134	Complete Streets Network | Regional
Napa	American Canyon	Green Island Road Class I	NAP170006	25-T09-134	Complete Streets Network | Regional
Napa	American Canyon	Melvin Road Pavement Rehabilitation (TR27-0100)	NAP250205	25-T09-134	Complete Streets Network | Regional
Napa	MTC	Napa Valley Forward: Safety and Operational Imp.	NAP190007	25-T06-017	Bay Area Forward Program | Regional
Napa	Napa (City)	Complete Streets Improvement Plan (Jefferson SS4A)	NAP250201	25-T09-134	Complete Streets Network | Regional
Napa	Napa (City)	EV Charging in Downtown Napa	NAP250206	25-EN8-184	Clean Vehicle Initiatives | Regional
Napa	Napa (City)	Napa Planning and Demonstration Activities (SS4A)	NAP250202	25-T09-134	Complete Streets Network | Regional
Napa	Napa (City)	Park Napa Project	NAP250204	25-EN9-185	Transportation Demand Management Initiatives | Regional
Napa	Napa (City)	Silverado Trail Five-Way Intersection Improvements	NAP170009	25-T08-111	Roadway Improvements | Soscol Ave | Between Magnolia Dr and Silverado Trl (SR-121)/3rd St/East Ave/Coombsville Rd
Napa	Napa (City)	SR-29 Bicycle and Pedestrian Undercrossing	NAP130004	25-T09-134	Complete Streets Network | Regional
Napa	Napa County	Garnett Bridge Greenwood Ave - 21C0042	NAP150002	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Napa	Napa County	H9-04-018 Silverado Trail Guardrail Upgrades	NAP190003	25-T08-090	County Safety, Security and Other
Napa	Napa County	H9-04-019 Silverado Trail Striping	NAP190001	25-T08-090	County Safety, Security and Other
Napa	Napa County	NVVT Vista Carneros Project	NAP250203	25-T08-091	Planning/Program | Regional
Napa	NVTA	Imola Park n Ride and Express Bus Stop Improvement	NAP190006	25-T11-152	Express Bus | Service Expansion | NVTA
Napa	NVTA	Napa Valley Vine Trail Calistoga-St. Helena Seg.	NAP150003	25-T09-134	Complete Streets Network | Regional
Napa	NVTA	NVTA- Vine Transit Bus Maintenance Facility	NAP170003	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Napa	NVTA	NVTA: Replace Rolling Stock	NAP090005	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Napa	NVTA	SR 12/29/221 Soscol Junction Interchange Imps.	NAP090003	25-T09-112	Corridor & Interchange Improvements | SR-29 | Napa County
Napa	NVTA	SR-29 American Canyon Operational & Multimodal Imp	NAP230202	25-T08-113	Roadway Improvements | SR-29 | Between Napa Junction Rd and American Canyon Rd
Napa	Napa Valley Vine Trail Coalition	Napa Valley Vine Trail - Yountville to St Helena	NAP230201	25-T09-134	Complete Streets Network | Regional
Napa	Saint Helena	Main Street St. Helena Pedestrian Improvements	NAP170005	25-T09-134	Complete Streets Network | Regional
Napa	Saint Helena	Silverado Trail Guardrail Replacement H9-04-032	NAP190002	25-T08-090	County Safety, Security and Other
Regional	ACE	ACE Positive Train Control	REG110044	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BAAQMD	SF Bay Area Electric Vehicle Charging Project	REG230209	25-EN8-184	Clean Vehicle Initiatives | Regional
Regional	BART	BART Cyber Security	REG250202	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	BART Train Control Renovation	BRT030004	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	BART Transbay Core Capacity Improvements	REG170017	25-T11-173	Rail | Service Frequency Upgrades| BART | System ("Core Capacity")
Regional	BART	BART Variable Parking Pricing	REG230207	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	BART: Rail, Way and Structures Program	BRT97100B	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	BART: Railcar Procurement Program	REG090037	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	BART: Traction Power System Renovation	BRT030005	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	BART-Elevator Renovation Program	ALA190014	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	BART	Link21 - Phase 1: Program Development	REG250201	25-T12-176	Transit Studies and Project Development | Regional
Regional	Caltrain	Caltrain Mini-High Platform Improvements	REG210202	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Regional	Caltrain	Caltrain: Signal/Communication Rehab. & Upgrades	SM-050041	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	MTC	511 Carpool and Vanpool Programs	REG170003	25-T08-086	Carpool/Vanpool Program | Regional
Regional	MTC	511 Next Gen	REG170013	25-T08-084	511 Bay Area Program | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Regional	MTC	Active Operations Management & Design Alternatives	REG250206	25-T06-017	Bay Area Forward Program | Regional
Regional	MTC	Active Transportation Technical Assistance	REG230206	25-T08-091	Planning/Program | Regional
Regional	MTC	Bay Area Commuter Benefits Program	MTC050001	25-EN9-185	Transportation Demand Management Initiatives | Regional
Regional	MTC	Bay Area Vision Zero (BayVIZ) System Support	REG250213	25-T10-135	Speed Limit Reductions Initiatives| Regional
Regional	MTC	Bay Bridge Forward:I-80, SFOBB, & Carquinez Bridge	REG250208	25-T06-017	Bay Area Forward Program | Regional
Regional	MTC	Bay Trail Planning and Technical Assistance	REG230201	25-T09-134	Complete Streets Network | Regional
Regional	MTC	Bay Wheels Bikeshare E-bike Expansion	REG250205	25-EN9-185	Transportation Demand Management Initiatives | Regional
Regional	MTC	Climate Initiatives Education and Outreach	REG170006	25-EN9-185	Transportation Demand Management Initiatives | Regional
Regional	MTC	Clipper 2.0 Fare Payment System	REG170022	25-T02-008	Improve the Rider Experience through Transit Network Integration | Integrated Fare Structure | Regional
Regional	MTC	Freeway Performance Initiative (FPI)	REG090003	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Regional	MTC	Incident Management Program	REG230208	25-T08-088	Regional Communications and Incident Management Program | Regional
Regional	MTC	Innovative Deployments to Enhance Arterials TSP	REG250204	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Regional	MTC	Priority Conservation Area Grant Implementation	REG210201	25-T08-091	Planning/Program | Regional
Regional	MTC	Regional Bikeshare Procurement Strategy	REG250211	25-T08-091	Planning/Program | Regional
Regional	MTC	Regional Communications Infrastructure Upgrade	REG170002	25-T08-088	Regional Communications and Incident Management Program | Regional
Regional	MTC	Regional ITS Architecture	REG230203	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Regional	MTC	Regional Mapping and Wayfinding	REG230202	25-T02-009	Improve the Rider Experience through Transit Network Integration | Mapping and Wayfinding | Regional
Regional	MTC	Regional Planning - PDA Implementation	REG170016	25-T08-091	Planning/Program | Regional
Regional	MTC	Regional Streets and Roads Program	REG090039	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Regional	MTC	Regional Transportation Demand Management (TDM)	REG250209	25-EN9-185	Transportation Demand Management Initiatives | Regional
Regional	MTC	Regional Vision Zero/Safety Prog Coord-Outreach	REG230205	25-T10-135	Speed Limit Reductions Initiatives| Regional
Regional	MTC	Shared Connected/Automated Vehicles and Technology	REG250207	25-T06-017	Bay Area Forward Program | Regional
Regional	MTC	Smart Transbay Transit	REG250210	25-T03-011	Improve the Rider Experience through Refined Timing at Key Regional Hubs| Regional
Regional	MTC	TCP Financing Repayment Obligations	REG170023	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	MTC	Toll Bridge Maintenance	REG130001	25-T01-006	Operate & Maintain the Existing System | Toll Bridges | Regional
Regional	MTC	Toll Bridge Rehabilitation Program	REG130002	25-T01-006	Operate & Maintain the Existing System | Toll Bridges | Regional
Regional	San Jose	Regional Speed Safety Camera Campaign	REG250203	25-T10-135	Speed Limit Reductions Initiatives| Regional
Regional	SMART	SMART Rail System Extension to Healdsburg	REG250212	25-T12-181	Rail | Service Expansion | SMART | Healdsburg
Regional	WETA	Ferry Service - Berkeley	MTC050027	25-T11-164	Ferry | Service Expansion | WETA | Berkeley-San Francisco
Regional	WETA	WETA: Ferry Channel and Berth Dredging	REG090054	25-T11-166	Ferry | Service Frequency Upgrades | WETA
Regional	WETA	WETA: Ferry Major Component Rehab/Replacement	REG090057	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Regional	WETA	WETA: Fixed Guideway Connectors	REG090067	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	Campbell	Campbell PDA Enhancements	SCL210024	25-T09-134	Complete Streets Network | Regional
Santa Clara	Campbell	Hamilton Avenue Rehabilitation and Complete Street	SCL250208	25-T09-134	Complete Streets Network | Regional
Santa Clara	Campbell	SR 17 Southbound/Hamilton Ave. Off-Ramp Widening	SCL210003	25-T06-064	Interchange Improvements | SR-17| Hamilton Ave
Santa Clara	Cupertino	Cupertino Stevens Creek Blvd Class IV Bike Lanes	SCL210034	25-T08-093	Minor Roadway Improvements | Regional
Santa Clara	Cupertino	Homestead/ De Anza TS Safety Improvement H9-04-011	SCL190019	25-T08-090	County Safety, Security, Noise and Other
Santa Clara	Cupertino	McClellan Road Bridge Reconstruction Project	SCL250234	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Santa Clara	Cupertino	Preventative Maintenance on 5 Bridges in Cupertino	SCL190018	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Santa Clara	Gilroy	Gateway Senior Apartments Ped Crossing Safety Imps	SCL250230	25-T08-090	Other Locally IdentifiedImprovements | Regional
Santa Clara	Gilroy	Gilroy Public Library EV Chargers	SCL250237	25-EN8-184	Clean Vehicle Initiatives | Regional
Santa Clara	Gilroy	Local Road Safety Plan	SCL250250	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	Gilroy	Safe Routes to School - Christopher High School	SCL230227	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	Gilroy	Tenth Street Bridge at Uvas Creek	SCL250204	25-T08-093	Minor Roadway Improvements | Regional
Santa Clara	Los Altos	N San Antonio Rd Complete Streets Project	SCL230206	25-T09-134	Complete Streets Network | Regional
Santa Clara	Los Gatos	Blossom Hill Road – Union to Camden	SCL250212	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	Los Gatos	H9-04-015 Los Gatos Guardrail Upgrades	SCL190021	25-T08-090	County Safety, Security, Noise and Other
Santa Clara	Los Gatos	Highway 17 Bicycle and Pedestrian Overcrossing	SCL230223	25-T09-134	Complete Streets Network | Regional
Santa Clara	MTC	SR-237 Adaptive Ramp Metering Implementation	SCL230242	25-T06-017	Bay Area Forward Program | Regional
Santa Clara	Milpitas	Calaveras Boulevard Improvements	SCL190009	25-T08-115	Roadway Widening | Calaveras Blvd | Between Abel St and Milpitas Blvd
Santa Clara	Milpitas	Main Street Revitalization	SCL250233	25-T09-134	Complete Streets Network | Regional
Santa Clara	Milpitas	South Milpitas Blvd Extension and Bridge	SCL210035	25-T08-093	Minor Roadway Improvements | Regional
Santa Clara	Morgan Hill	City of Morgan Hill Transit Hub Charging Stations	SCL250251	25-EN8-184	Clean Vehicle Initiatives | Regional
Santa Clara	Morgan Hill	Monterey Road Traffic, Bicycle, and Pedestrian Imp	SCL230204	25-T09-134	Complete Streets Network | Regional
Santa Clara	Mountain View	El Camino Real/El Monte/Escuela Intersection Imps	SCL230213	25-T09-134	Complete Streets Network | Regional
Santa Clara	Mountain View	Middlefield Road Complete Streets	SCL230212	25-T09-134	Complete Streets Network | Regional
Santa Clara	Mountain View	Mountain View - Stierlin Rd Bike-Ped Improvements	SCL210012	25-T09-134	Complete Streets Network | Regional
Santa Clara	Mountain View	Mountain View Mobility Hub Pilot	SCL210025	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	Mountain View	Mountain View Shoreline Blvd Pathway Improvements	SCL210027	25-T09-134	Complete Streets Network | Regional
Santa Clara	Mountain View	Rengstorff Ave Grade Separation	SCL190032	25-T11-174	Grade Separations and Modernization | Regional
Santa Clara	Palo Alto	37C0223 - Newell Rd Bridge over San FrancisquitoCr	SCL170018	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Santa Clara	Palo Alto	Churchill Avenue Grade Separation Project	SCL230241	25-T11-174	Grade Separations and Modernization | Regional
Santa Clara	Palo Alto	Meadow Drive & Charleston Road Grade Separation	SCL230240	25-T11-174	Grade Separations and Modernization | Regional
Santa Clara	Palo Alto	Palo Alto School-Community Partnership EV Charging	SCL250252	25-EN8-184	Clean Vehicle Initiatives | Regional
Santa Clara	Palo Alto	Palo Alto SS4A Safety Action Plan	SCL250201	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	Palo Alto	Quarry Road Connection Project	SCL250256	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Santa Clara	Palo Alto	South Palo Alto Bikeways Demonstration Project	SCL250211	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	San Jose	Bay Trail Reach 9 & 9B	SCL050082	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	Better Bikeway San Jose - San Fernando Street	SCL190029	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	En Movimiento - Quick Strike Improvements	SCL210015	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	H9-04-027 Monterey Road - HSIP Guardrail Upgrade	SCL190020	25-T08-090	County Safety, Security, Noise and Other
Santa Clara	San Jose	Jackson Ave Complete Streets	SCL230208	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	Julian and St. James Couplet Conversion	SCL210026	25-T09-134	Complete Streets Network | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Santa Clara	San Jose	Montague Expwy/McCarthy Blvd-O'Toole Ave Grade Sep	SCL250235	25-T08-114	Roadway Improvements | Montague Expwy | McCarthy Blvd/O'Toole Ave
Santa Clara	San Jose	San Fernando Street Mobility Hubs	SCL230237	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	San Jose	San Jose - Autumn Street Extension	SCL110006	25-T08-093	Minor Roadway Improvements | Regional
Santa Clara	San Jose	San Jose Community EV Charging Access Project	SCL250254	25-EN8-184	Clean Vehicle Initiatives | Regional
Santa Clara	San Jose	San Jose Downtown Bikeways - Quick Strike	SCL210016	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	San Jose Pavement Maintenance	SCL170044	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Santa Clara	San Jose	San Jose: Los Gatos Creek Reach 5 Underpass	SCL110029	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	Santa Clara Bridge Over Coyote Creek	SCL190055	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Santa Clara	San Jose	Signalized Intersections Pedestrian Safety Improve	SCL230209	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	San Jose	SJ Advancing Curb Management	SCL250255	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Santa Clara	San Jose	SR 87/Capitol Expressway/Narvaez Ave. IC Imp	SCL210020	25-T06-067	Interchange Improvements | SR-87| Capitol Expwy/Narvaez Ave
Santa Clara	San Jose	US 101/Old Oakland Road Interchange improvements	SCL190001	25-T06-056	Interchange Improvements | US- 101 | Old Oakland Rd
Santa Clara	San Jose	W San Carlos Urban Village Streets Improvements	SCL170061	25-T01-004	Bicycle and Pedestrian Program
Santa Clara	San Jose	White Road Complete Streets Safety Improvements	SCL230207	25-T09-134	Complete Streets Network | Regional
Santa Clara	San Jose	Willow-Keyes Complete Streets Improvements	SCL190028	25-T09-134	Complete Streets Network | Regional
Santa Clara	Santa Clara (City)	Anna Dr Neighborhood Flood Protection	SCL230220	25-T09-134	Complete Streets Network | Regional
Santa Clara	Santa Clara (City)	Central Santa Clara Bicycle and Pedestrian Improve	SCL230205	25-T09-134	Complete Streets Network | Regional
Santa Clara	Santa Clara (City)	De La Cruz/Lick Mill/Scott Blvds Bicycle Lanes	SCL230202	25-T09-134	Complete Streets Network | Regional
Santa Clara	Santa Clara (City)	Santa Clara Uncontrolled Crosswalk (Phase 2)	SCL250238	25-T09-134	Complete Streets Network | Regional
Santa Clara	Santa Clara County	County of Santa Clara EV Charging Project	SCL250249	25-EN8-184	Clean Vehicle Initiatives | Regional
Santa Clara	Santa Clara County	Montague Expwy Widening - Trade Zone-Great Mall	SCL090017	25-T08-116	Roadway Widening | Montague Expwy | Between Great Mall and McCarthy Blvd/O'Toole Ave
Santa Clara	Santa Clara County	Santa Clara Co Circ and Mobility Element Update	SCL230222	25-T08-091	Planning/Program | Regional
Santa Clara	VTA	US 101/Buena Vista Avenue Interchange Improvement	SCL190010	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Santa Clara	VTA	Access Controls & CCTV Capability Expansion	SCL230235	25-T11-138	Other Investments to Enhance and Modernize Transit Facilities | Regional
Santa Clara	VTA	ADA Upgrades at Facilities FY26/27	SCL250245	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Advanced Passenger Management Project	SCL230239	25-T11-138	Other Investments to Enhance and Modernize Transit Facilities | Regional
Santa Clara	VTA	Advanced Warning System Project FY25	SCL250222	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Audio Frequency Train Activated Circuit (AFTAC)	SCL230238	25-T11-138	Other Investments to Enhance and Modernize Transit Facilities | Regional
Santa Clara	VTA	BART - Berryessa to San Jose Extension	BRT030001	25-T12-180	Rail | Service Expansion | BART | Santa Clara ("Silicon Valley Phase II")
Santa Clara	VTA	Bascom Avenue Complete Street (I-880 to Hamilton)	SCL230221	25-T09-134	Complete Streets Network | Regional
Santa Clara	VTA	Better Bus Stops Cycle 3	SCL250216	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	VTA	Blossom Hill Station Transit-Oriented Development	SCL250236	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Bridge Structure Repairs FY26/27	SCL250244	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Bus Wheel Lift Replacement	SCL250262	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Capital Painting Program	SCL250264	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Capital Paving Program	SCL250261	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Capital Roof Replacement	SCL250263	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	CCTV Replacement	SCL250221	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	VTA	Central Bikeway	SCL250207	25-T09-134	Complete Streets Network | Regional
Santa Clara	VTA	Cerone Operations Command and Control Center	SCL230203	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Counterterrorism Planning, Training, and Exercise	SCL250217	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	VTA	Eastridge to BART Regional Connector (EBRC)	SCL050009	25-T12-179	Light Rail | Service Expansion | VTA| Eastridge
Santa Clara	VTA	Expand Cerone Bus Yard for Electric Vehicles	SCL230218	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Santa Clara	VTA	Expand Chaboya Bus Yard for Electric and Fuel Cell	SCL230219	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Santa Clara	VTA	Expand VTA's North Yard for Electric Bus	SCL250247	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Santa Clara	VTA	Facilities Maintenance Equipment Program	SCL230226	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Fiber Optic Replacement Phase 2 FY26	SCL250259	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Fiber Optics Replacement Program	SCL230232	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	VTA	Fire Life Safety Replacement	SCL250248	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Gilroy Station Area Plan	SCL250229	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	VTA	Guadalupe 2nd Entrance	SCL230234	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Guadalupe Elevator and Escalator Drainage Improvem	SCL230233	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Guadalupe Train Wash Replacement	SCL250210	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Homestead Road Safe Routes to School	SCL230228	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	VTA	Hostetter Turnback	SCL250224	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Hwy. Transp Operations System/FPI Phase 1 & 2	SCL190003	25-T08-093	Minor Roadway Improvements | Regional
Santa Clara	VTA	I-280/Winchester Blvd Interchange Improvement	SCL150014	25-T06-028	Interchange Improvements | I-280 | Winchester Blvd
Santa Clara	VTA	I-280/Wolfe Road Interchange Improvement	SCL190011	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Santa Clara	VTA	I-880 Express Lanes (SR 237 to US 101)	SCL250257	25-T07-070	Express Lane Network Project Development | Regional
Santa Clara	VTA	Light Rail Station Rehabilitation FY24-FY25	SCL230231	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Light Rail Station Rehabilitation FY26	SCL250243	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	LRV Charging Station	SCL250223	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Santa Clara	VTA	Mobility Management and Assistance Program	SCL250213	25-T08-090	Other Locally IdentifiedImprovements | Regional
Santa Clara	VTA	Modifications for ZEBs	SCL250226	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Santa Clara	VTA	Monterey Road Transit Lane	SCL230216	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Santa Clara	VTA	N 1st/Tasman EB Track Switch Mod - TSP Enhancement	SCL210030	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Non-Vasona Pedestrian Gates	SCL250220	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	VTA	Obsolete Bus Shelters Cycle 1	SCL250215	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	VTA	Palo Alto Avenue Grade Separation Project	SCL250206	25-T11-174	Grade Separations and Modernization | Regional
Santa Clara	VTA	Rail Replacement and Rehabilitation FY26	SCL250260	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Replace (27) Paratransit Vehicles with New Cutaway	SCL250253	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Replace Fault Monitoring System on LRVs	SCL250227	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Replace two (2) hi-rail and crew trucks for LRT	SCL250218	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Santa Clara	VTA	Safety Enhancements at Grade Crossings	SCL230230	25-T11-174	Grade Separations and Modernization | Regional
Santa Clara	VTA	San Carlos / Woz Way TSP	SCL250241	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Santa Clara	VTA	Signal Improvements - Tasman East Design 2	SCL250240	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Silicon Valley Express Lanes - US 101 South County	SCL250258	25-T07-070	Express Lane Network Project Development | Regional
Santa Clara	VTA	Spooky Knoll Trail Project	SCL250209	25-T09-134	Complete Streets Network | Regional
Santa Clara	VTA	SR 152 New Trade Corridor	SCL090016	25-T07-072	Other Freeway/Highway Expansion Project Development Reserve | Regional
Santa Clara	VTA	SR 237 Westbound On-Ramp at Middlefield Rd.	SCL230001	25-T06-069	Interchange Improvements | SR- 237 | Middlefield Rd
Santa Clara	VTA	SR 237/Lawrence Expressway/Carribean Dr IC Imp	SCL210019	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Santa Clara	VTA	SR 85 Express Lanes	SCL090030	25-T06-065	Express Lane | HOV Conversion | SR-85 | Between SR-87 and US- 101 ("Phase 4")
Santa Clara	VTA	SR-17 Bike/Ped Trail and Wildlife Crossing	SCL210028	25-T09-134	Complete Streets Network | Regional
Santa Clara	VTA	Trackway Anti-trespass Paneling Project FY25	SCL250214	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Santa Clara	VTA	Transit Center Park and Ride and Bus Stop Rehab	SCL230225	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Transit Reliability Imp and Performance System	SCL230214	25-T11-138	Other Investments to Enhance and Modernize Transit Facilities | Regional
Santa Clara	VTA	Upgrade Obsolete Ticket Vending Machine Parts	SCL250219	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	US 101/Ellis Street Interchange Improvement	SCL210021	25-T06-060	Interchange Improvements | US- 101 | Ellis St
Santa Clara	VTA	US 101/San Antonio Rd/Charleston/Rengstorff IC Imp	SCL190012	25-T06-059	Interchange Improvements | US- 101 | Between San Antonio Rd and Charleston Rd/Rengstroff Rd
Santa Clara	VTA	US 101/SR 152/10th Ramp and Intersection Imp.	SCL210002	25-T06-061	Interchange Improvements | US- 101 | SR-152/10th St
Santa Clara	VTA	US 101/SR 25 Interchange - Phase 1	SCL190013	25-T06-018	Corridor & Interchange Improvements | US-101 | Santa Clara County
Santa Clara	VTA	US 101/SR 25/Santa Teresa Boulevard Extension	SCL230201	25-T08-094	Other Principal Arterial Improvements VMT Mitigation Reserve | Regional
Santa Clara	VTA	US 101/Zanker Road-Skyport Drive-N. Fourth St. Imp	SCL190007	25-T06-062	Interchange Improvements | US- 101 | Zanker Rd, Skyport Dr and N. Fourth St
Santa Clara	VTA	US101/Monterey Road Wildlife Crossings	SCL250228	25-T09-134	Complete Streets Network | Regional
Santa Clara	VTA	Video Management System (VMS)	SCL250225	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA Cybersecurity	SCL250246	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA Electronic Locker Upgrade and Replacement	SCL210017	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA North Yard Tire Awning	SCL210033	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA Rail Substation Rehab/Replacement	SCL210006	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA Track Intrusion Abatement	SCL150008	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA ZEB Transition On-Route Charging Pilot	SCL210201	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Santa Clara	VTA	VTA: Facilities ADA Upgrades	SCL190039	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: Guadalupe Steam Rack Improv & Liner Replace	SCL190053	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: HVAC Replacement	SCL190026	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: Light Rail Bridge and Structure - SG Repair	SCL110099	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: Non-Revenue Vehicle Procurement	SCL170047	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: Paratransit Vehicle Procurement	SCL170005	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: Rail Replacement Program	SCL050002	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	VTA: Security Enhancement at Chaboya Parking Lot	SCL210008	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	VTA	Wheels on the Bus – Real-Time Data (RTD)	SCL230215	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Santa Clara	Saratoga	Citywide Master Plan for Bikeways and Sidewalks	SCL230224	25-T08-091	Planning/Program | Regional
Santa Clara	Saratoga	Saratoga Safe Routes to School Needs/Masterplan	SCL250239	25-T10-135	Speed Limit Reductions Initiatives| Regional
Santa Clara	Sunnyvale	City of Sunnyvale Stevens Creek Trail Extension	SCL230236	25-T09-134	Complete Streets Network | Regional
Santa Clara	Sunnyvale	H9-04-034 Advanced Dilemma Zone Detection Phase 2	SCL190022	25-T08-090	County Safety, Security, Noise and Other
Santa Clara	Sunnyvale	Pedestrian and SRTS Imps in SNAIL and Braly Corner	SCL230229	25-T09-134	Complete Streets Network | Regional
Santa Clara	Sunnyvale	Peery Park "Sense of Place" Improvements	SCL170023	25-T09-134	Complete Streets Network | Regional
Santa Clara	Sunnyvale	Poplar Avenue Sidewalk Construction Project	SCL250232	25-T09-134	Complete Streets Network | Regional
Santa Clara	Sunnyvale	Sunnyvale Avenue/California Avenue Traffic Signal	SCL250231	25-T09-134	Complete Streets Network | Regional
Santa Clara	Sunnyvale	Sunnyvale SNAIL Neighborhood Improvements	SCL170017	25-T09-134	Complete Streets Network | Regional
San Francisco	BART	Embarcadero Stn: Platform Elevator Project	SF-170016	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	Caltrain	San Francisco RailyardsTOC Implementation Strategy	SF-230203	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
San Francisco	Port of San Francisco	Amador Street Infrastructure Improvements	SF-170012	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
San Francisco	Port of San Francisco	Mission Bay Ferry Terminal	SF-170001	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
San Francisco	Port of San Francisco	POSF-SFMTA Parking Management Pilot	SF-230208	25-EN9-185	Transportation Demand Management Initiatives | Regional
San Francisco	SFCTA	Hillcrest Road Improvement Project	SF-230211	25-T09-134	Complete Streets Network | Regional
San Francisco	SFCTA	HOV/HOT Lanes on U.S.101 and I-280 in SF	SF-130008	25-T07-070	Express Lane Network Project Development | Regional
San Francisco	SFCTA	I-280 Ocean/Geneva Interchange Improve. at Balboa	SF-250201	25-T06-025	Interchange Improvements | I-280 | Ocean Ave and Geneva Ave
San Francisco	SFCTA	Oakdale Caltrain Station	SF-090011	25-T11-171	Rail | Service Expansion | Caltrain| Bayview Station
San Francisco	SFCTA	Quint-Jerrold Connector Road	SF-150008	25-T08-093	Minor Roadway Improvements | Regional
San Francisco	SFCTA	SF Downtown Congestion Pricing	SF-130017	25-T05-016	Congestion Pricing & Mobility Improvements | Downtown San Francisco
San Francisco	SFCTA	Treasure Island Congestion Pricing Program	SF-110049	25-T05-015	Congestion Pricing & Mobility Improvements | Treasure Island
San Francisco	SFCTA	Treasure Island Pricing Mobility Improvements	SF-130005	25-T05-015	Congestion Pricing & Mobility Improvements | Treasure Island
San Francisco	SFCTA	US 101 Doyle Drive Availability Payments	SF-190011	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
San Francisco	SFCTA	Yerba Buena Island (YBI) Ramp Improvements	SF-070027	25-T06-022	Interchange Improvements | I-80 | Yerba Buena Island
San Francisco	SFCTA	Yerba Buena Island Multi-Use Path and Transit Lane	SF-210001	25-T09-134	Complete Streets Network | Regional
San Francisco	SF DPW	Harney Way Roadway Widening	SF-090004	25-T08-093	Minor Roadway Improvements | Regional
San Francisco	SF DPW	HOPE SF Street Network - Sunnydale and Potrero	SF-170013	25-T08-093	Minor Roadway Improvements | Regional
San Francisco	SF DPW	Hunters Pt Shipyard and Candlestick Pt Local Roads	SF-110006	25-T08-093	Minor Roadway Improvements | Regional
San Francisco	SF DPW	SF- Better Market Street Transportation Elements	SF-130001	25-T09-134	Complete Streets Network | Regional
San Francisco	SFMTA	29 Sunset Improvement Project	SF-230202	25-T11-153	Local Bus and Light Rail| Service Frequency Upgrades | SFMTA | Systemwide ("Muni Forward")
San Francisco	SFMTA	40' & 60' Motor Coach Replacement Procurement	SF-250207	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	Bayview Community Shuttle	SF-250208	25-T11-154	Local Bus | Service Expansion | SFMTA | Southeast San Francisco
San Francisco	SFMTA	Bayview Multimodal Community Corridor	SF-230206	25-T08-090	Other Locally IdentifiedImprovements | Regional
San Francisco	SFMTA	Cable Car Traction Power & Guideway Rehab	SF-99T002	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	Central Embarcadero Safety Project	SF-230201	25-T10-135	Speed Limit Reductions Initiatives| Regional
San Francisco	SFMTA	Expanding Access to Charging in EPC	SF-250209	25-EN8-184	Clean Vehicle Initiatives | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
San Francisco	SFMTA	Geary Bus Rapid Transit	SF-070004	25-T11-153	Local Bus and Light Rail| Service Frequency Upgrades | SFMTA | Systemwide ("Muni Forward")
San Francisco	SFMTA	Geneva Harney BRT Infrastructure - Eastern Segment	SF-090023	25-T11-155	Rapid Bus | Modernization | SFMTA | Geneva Ave/Harney Wy
San Francisco	SFMTA	Geneva Harney BRT Infrastructure: Central Segment	SF-090020	25-T11-155	Rapid Bus | Modernization | SFMTA | Geneva Ave/Harney Wy
San Francisco	SFMTA	Historic Streetcar Extension to Fort Mason	SF-070003	25-T11-172	Light Rail | Modernization | Muni Metro
San Francisco	SFMTA	Howard Streetscape Improvement Project	SF-230210	25-T09-134	Complete Streets Network | Regional
San Francisco	SFMTA	Light Rail Vehicle Procurement	SF-090012	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	Lincoln Way Traffic Signals	SF-250210	25-T09-134	Complete Streets Network | Regional
San Francisco	SFMTA	Pay or Permit Parking Program Expansion	SF-230209	25-EN9-185	Transportation Demand Management Initiatives | Regional
San Francisco	SFMTA	Presidio Yard Modernization Project	SF-250205	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	San Francisco - Folsom Streetscape	SF-210003	25-T09-134	Complete Streets Network | Regional
San Francisco	SFMTA	San Francisco Muni Light Rail System Accessibility	SF-250203	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SF Muni Rail, Way & Structures Program	SF-95037B	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SF Muni Third St LRT Phase 2 - New Central Subway	SF-010037	25-T12-176	Transit Studies and Project Development | Regional
San Francisco	SFMTA	SFMTA - Core Capacity Program	SF-190012	25-T11-138	Other Investments to Enhance and Modernize Transit Facilities | Regional
San Francisco	SFMTA	SFMTA Facility Development -- Bus Facility Upgrade	SF-230204	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SFMTA Joint - Development Program Tech Assistance	SF-250204	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SFMTA Overhead Line Recon and Traction Power Prog	SF-970170	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SFMTA Zero Emission Bus Procurement	SF-190013	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Francisco	SFMTA	SFMTA: Cable Car Vehicle Renovation Program	SF-970073	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SFMTA: Motor Coach and Trolley Coach Mid-Life Over	SF-170018	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SFMTA: Paratransit Vehicle Replacements	SF-090035	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	SFMTA: Rehab Historic Streetcars	SF-170021	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	Smart and Integrated Management and Fleet Charging	SF-250211	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Francisco	SFMTA	Tenderloin Community Safe Streets Project	SF-250202	25-T10-135	Speed Limit Reductions Initiatives| Regional
San Francisco	SFMTA	Transit Center in Hunters Point	SF-090016	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
San Francisco	SFMTA	Western Addition Safe Streets	SF-230207	25-T08-090	Other Locally IdentifiedImprovements | Regional
San Francisco	TBJPA	Transbay Terminal/Caltrain Downtown Ext: Ph. 2	SF-050002	25-T12-178	Rail | Service Expansion | Caltrain/High Speed Rail | Downtown San Francisco ("Portal")
San Francisco	Treasure Island Mobility Management Agency	Treasure Island Ferry Terminal Landside Imprvmnts	SF-190006	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
San Francisco	WETA	WETA: Electric Vessels and Related Infrastructure	SF-190008	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Francisco	WETA	WETA: Replace Ferry Vessels	SF-110053	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	Atherton	Alameda de las Pulgas Traffic and Safety Imps	SM-230214	25-T09-134	Complete Streets Network | Regional
San Mateo	BART	Daly City BART Station Mobility Hub	SM-250223	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
San Mateo	Belmont	Alameda de las Pulgas Corridor Improvements	SM-250204	25-T09-134	Complete Streets Network | Regional
San Mateo	Belmont	Ralston Avenue Segment 4	SM-250202	25-T09-134	Complete Streets Network | Regional
San Mateo	Burlingame	Burlingame - Broadway Grade Separation	SM-210004	25-T11-174	Grade Separations and Modernization | Regional
San Mateo	Burlingame	Burlingame Ped Safe Routes and Mobility Imp	SM-210007	25-T09-134	Complete Streets Network | Regional
San Mateo	Burlingame	Old Bayshore Hwy. Safety & Economic Revitalization	SM-250224	25-T09-134	Complete Streets Network | Regional
San Mateo	Burlingame	Rollins Road Bicycle and Pedestrian Improvement	SM-230201	25-T09-134	Complete Streets Network | Regional
San Mateo	Caltrain	Caltrain Electrification	SF-010028	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Mateo	Caltrain	Caltrain Railcar Replacement	SM-230209	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	Caltrain	Caltrain Systemwide Track Rehab and Related Struct	SM-03006B	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	Caltrain	Caltrain TVM Rehab and Clipper Functionality	SM-170010	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	Caltrain	Middle Avenue Pedestrian and Bicycle Undercrossing	SM-230203	25-T09-134	Complete Streets Network | Regional
San Mateo	Caltrain	Peninsula Corridor Electrification Expansion	SM-190002	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Mateo	Colma	El Camino Real Complete Streets - Segment A	SM-250213	25-T09-134	Complete Streets Network | Regional
San Mateo	Daly City	Bayshore and Woodrow Wilson Elementary Sustainable	SM-250212	25-T09-134	Complete Streets Network | Regional
San Mateo	Daly City	John Daly Blvd Pedestrian and Bicycle Facility	SM-250219	25-T09-134	Complete Streets Network | Regional
San Mateo	Daly City	Serramonte Boulevard Street Surfacing Project	SM-250206	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
San Mateo	Daly City	Southgate Ave and School St Safety Improvements	SM-210012	25-T10-135	Speed Limit Reductions Initiatives| Regional
San Mateo	East Palo Alto	East Bayshore Pedestrian and Cyclist Improvement	SM-250215	25-T09-134	Complete Streets Network | Regional
San Mateo	East Palo Alto	East Palo Alto/San Mateo Co. Regional EV Charging	SM-250227	25-EN8-184	Clean Vehicle Initiatives | Regional
San Mateo	East Palo Alto	Fordham St. - Sustainable Streets Project	SM-250214	25-T09-134	Complete Streets Network | Regional
San Mateo	East Palo Alto	US 101 University Ave Interchange Improvements	SM-070006	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
San Mateo	Half Moon Bay	Half Moon Bay - Eastside Parallel Trail Segment 2	SM-250207	25-T09-134	Complete Streets Network | Regional
San Mateo	Half Moon Bay	Half Moon Bay - Poplar Complete Streets	SM-170013	25-T09-134	Complete Streets Network | Regional
San Mateo	Half Moon Bay	Half Moon Bay/San Mateo Co. Regional EV Charging	SM-250221	25-EN8-184	Clean Vehicle Initiatives | Regional
San Mateo	Menlo Park	EV Charging Infrastructure	SM-250226	25-EN8-184	Clean Vehicle Initiatives | Regional
San Mateo	Millbrae	Millbrae Transit Center MicroMobility Hub Pilot	SM-210010	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
San Mateo	Millbrae	Park Blvd, San Anselmo Ave and Sta. Teresa Wy Imps	SM-210011	25-T09-134	Complete Streets Network | Regional
San Mateo	Millbrae	Widen Millbrae Avenue	SM-210001	25-T08-093	Minor Roadway Improvements | Regional
San Mateo	Pacifica	Manor Drive Overcrossing and Milagra On Ramp	SM-170004	25-T06-063	Interchange Improvements | SR-1| Manor Dr
San Mateo	Pacifica	Resurfacing Sharp Park Priority Development Area	SM-250216	25-T09-134	Complete Streets Network | Regional
San Mateo	Pacifica	Sharp Park PDA Improvements	SM-230208	25-T09-134	Complete Streets Network | Regional
San Mateo	Portola Valley	Portola Valley Street Preservation	SM-170044	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
San Mateo	Portola Valley	Portola Valley/SM County Regional EV Charging	SM-250225	25-EN8-184	Clean Vehicle Initiatives | Regional
San Mateo	Redwood City	Bay Road Complete Street Rehabilitation	SM-230207	25-T09-134	Complete Streets Network | Regional
San Mateo	Redwood City	Blomquist Street Extension	SM-090007	25-T08-093	Minor Roadway Improvements | Regional
San Mateo	Redwood City	Jefferson Avenue Traffic Safety Improvement	SM-250217	25-T09-134	Complete Streets Network | Regional
San Mateo	Redwood City	Page Street Bike Boulevard	SM-250218	25-T09-134	Complete Streets Network | Regional
San Mateo	Redwood City	Redwood City Ferry Service	SM-110002	25-T11-165	Ferry | Service Expansion | WETA | Oakland-Redwood City
San Mateo	Redwood City	Roosevelt Ave Quick-build Traffic Calming	SM-210002	25-T09-134	Complete Streets Network | Regional
San Mateo	Redwood City	Roosevelt Avenue Traffic Calming project	SM-230204	25-T09-134	Complete Streets Network | Regional
San Mateo	Redwood City	US 101 / Woodside Interchange Improvement	SM-050027	25-T06-051	Interchange Improvements | US- 101 | SR-84 ("Woodside Rd")

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
San Mateo	San Bruno	Huntington Transit Corridor Bike/Ped Improvements	SM-170017	25-T09-134	Complete Streets Network | Regional
San Mateo	San Bruno	San Bruno Transit Corridor Ped Connection Ph4	SM-210003	25-T09-134	Complete Streets Network | Regional
San Mateo	San Carlos	Brittan Ave. Widening	SM-190001	25-T08-093	Minor Roadway Improvements | Regional
San Mateo	San Carlos	San Carlos/San Mateo County Regional EV Charging I	SM-250222	25-EN8-184	Clean Vehicle Initiatives | Regional
San Mateo	San Carlos	US101/Holly St I/C Mod and Bike/Ped Overcrossing	SM-090008	25-T06-050	Interchange Improvements | US- 101 | Holly St
San Mateo	San Francisco City/County	Southern Skyline Blvd. Ridge Trail Extension	SM-130031	25-T09-134	Complete Streets Network | Regional
San Mateo	San Mateo (City)	Delaware Street Safe Routes to School Corridor	SM-210006	25-T09-134	Complete Streets Network | Regional
San Mateo	San Mateo (City)	East Hillsdale Boulevard Ped/Bike Overcrossing	SM-170006	25-T09-134	Complete Streets Network | Regional
San Mateo	San Mateo (City)	SR92/El Camino Real (SR82) Ramp Modifications	SM-110047	25-T06-018	Other Investments to Improve Interchanges & Address Highway Bottlenecks | Regional
San Mateo	San Mateo CCAG	Improve US 101 operations near Rte 92	SM-090014	25-T06-052	Interchange Improvements | US- 101 | SR-92
San Mateo	San Mateo CCAG	ITS Improvements in San Mateo County Northern Citi	SM-170046	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
San Mateo	San Mateo CCAG	Safe Streets for All Supplemental Planning	SM-250210	25-T08-091	Planning/Program | Regional
San Mateo	San Mateo CCAG	San Mateo County SR2S Program	SM-110022	25-EN9-185	Transportation Demand Management Initiatives | Regional
San Mateo	San Mateo CCAG	SM Countywide ITS Improvements - SSF Segment	SM-070002	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
San Mateo	San Mateo CCAG	US 101/SR 92 Interchange Direct Connector Project	SM-250201	25-T06-053	Interchange Improvements | US- 101 | SR-92, Direct Connector
San Mateo	San Mateo CCAG	US-101 Managed Lanes North of I-380	SM-190009	25-T07-077	Express Lanes | New Lane | US- 101 | Between I-380 and the San Francisco County Line
San Mateo	San Mateo County	Pescadero Creek Road Rural Safety Planning/Demo	SM-250211	25-T09-134	Complete Streets Network | Regional
San Mateo	San Mateo County	Santa Cruz Ave/Alameda de las Pulgas Complete St	SM-230212	25-T09-134	Complete Streets Network | Regional
San Mateo	SAMTrans	El Camino Real Mid-County Multimodal Corridor Plan	SM-230210	25-T08-091	Planning/Program | Regional
San Mateo	SAMTrans	Replace 26 Paratransit Vehicles	SM-250205	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	SAMTrans	Replace 29-40' Diesel Buses with Fuel Cell	SM-250208	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Mateo	SAMTrans	Replace 33 40' Diesel Buses with Fuel Cell	SM-250209	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Mateo	SAMTrans	SamTrans Bus Replacement	SM-210014	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	SAMTrans	SamTrans Express Bus Service	SM-190003	25-T11-162	Express Bus | Service Expansion | SamTrans | US-101 and I-280 | Between San Mateo and San Francisco; Between San Bruno and Sunnyvale
San Mateo	SAMTrans	SamTrans Paratransit Vehicle Replacements	SM-210015	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
San Mateo	SAMTrans	SamTrans South Base BEB Charging Infrastructure	SM-210201	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
San Mateo	San Mateo County Transportation Authority	19th Avenue/Fashion Island Blvd Complete Streets	SM-230205	25-T09-134	Complete Streets Network | Regional
San Mateo	South San Francisco	Bridge Preventive Maintenance Program	SM-190013	25-T01-003	Regional and Local Bridges - Exisiting Conditions
San Mateo	South San Francisco	Ped. Imp. on W Orange and Hillsdale (H9-04-031)	SM-190006	25-T08-090	County Safety, Security and Other
San Mateo	South San Francisco	School St/Spruce Ave and Hillside Blvd Safety Imps	SM-230206	25-T09-134	Complete Streets Network | Regional
San Mateo	South San Francisco	South Linden Grade Separation Project	SM-250203	25-T11-174	Grade Separations and Modernization | Regional
San Mateo	South San Francisco	US 101/Produce Avenue Interchange Improvements	SM-110003	25-T06-054	Interchange Improvements | US- 101 | Produce Ave
San Mateo	Woodside	Old La Honda Rd. Bridge Rehab - 35C0190	SM-190007	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Solano	Benicia	Benicia H9-04-006 Pedestrian Crossing Enhancements	SOL190011	25-T08-090	County Safety, Security and Other
Solano	Benicia	Benicia: H9-04-005 Guardrail Upgrades	SOL190010	25-T08-090	County Safety, Security and Other
Solano	Benicia	East Fifth Street PDA - Affordable Housing Streets	SOL230202	25-T09-134	Complete Streets Network | Regional
Solano	Caltrans	Rio Vista SR12 Pavement Rehab and Intersection Imp	SOL150003	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Solano	Caltrans	Solano WB I-80 Cordelia Truck Scales	SOL190025	25-T08-089	Goods Movement Improvements | Regional
Solano	Dixon	Parkway Blvd/UPRR Grade Separation	SOL050009	25-T08-093	Minor Roadway Improvements | Regional
Solano	Fairfield	Downtown Streetscape (Phase 2)	SOL250211	25-T09-134	Complete Streets Network | Regional
Solano	Fairfield	East Tabor and Tolenas Sidewalks	SOL230206	25-T09-134	Complete Streets Network | Regional
Solano	Fairfield	Fairfield - Cadenasso Drive Paving	SOL210001	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Solano	Fairfield	Fairfield Signalized Intersection Improvements	SOL190013	25-T08-090	County Safety, Security and Other
Solano	Fairfield	Fairfield Transportation Center - Phase 3	SOL110007	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Solano	Fairfield	Fairfield West Texas Street Complete Streets	SOL210009	25-T09-134	Complete Streets Network | Regional
Solano	Fairfield	Fairfield/Vacaville Hannigan Station Improvements	SOL030002	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Solano	Fairfield	Fairfield: H9-04-013 Guardrail Project	SOL190012	25-T08-090	County Safety, Security and Other
Solano	Fairfield	Fairfield: HSIP 9 HAWK Installation H9-04-014	SOL190015	25-T08-090	County Safety, Security and Other
Solano	Fairfield	Fairfield-Suisun Intercity/Local Bus Replacement	SOL110041	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Solano	Fairfield	Grange Middle School SR2S and PavementPreservation	SOL170010	25-T09-134	Complete Streets Network | Regional
Solano	Fairfield	Linear Park Node 4 Safe Routes to School Improveme	SOL230205	25-T10-135	Speed Limit Reductions Initiatives| Regional
Solano	Fairfield	Travis Safe Routes to School and Transit	SOL230203	25-T10-135	Speed Limit Reductions Initiatives| Regional
Solano	Fairfield-Suisun Transit	Fairfield - Bus Fleet and Infrastructure	SOL190003	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Solano	Fairfield-Suisun Transit	Route Planning Restoration	SOL250202	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Solano	MTC	Solano I-80 Adaptive Ramp Metering Implementation	SOL250209	25-T06-017	Bay Area Forward Program | Regional
Solano	Rio Vista	Rio Vista: H9-04-026 Pedestrian Crossings	SOL190014	25-T08-090	County Safety, Security and Other
Solano	Solano County	Benicia Road Complete Streets Phase 2	SOL250207	25-T09-134	Complete Streets Network | Regional
Solano	Solano County	Farm to Market Phase 4	SOL250208	25-T09-134	Complete Streets Network | Regional
Solano	Solano County	Lake Solano Pavement Rehabilitation	SOL250206	25-T09-134	Complete Streets Network | Regional
Solano	Solano County	Redwood-Fairgrounds Dr Interchange Imps	SOL090015	25-T06-023	Interchange Improvements | I-80 | Redwood Pkwy and SR- 37/Fairgrounds Dr
Solano	Solano County	Solano 360 Transit Center Phase 1	SOL230204	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Solano	Solano County	Solano County Farm to Market Phase 3	SOL170016	25-T09-134	Complete Streets Network | Regional
Solano	Solano County	Solano County Roadway Preservation	SOL170015	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Solano	Solano County	Stevenson Bridge Rehab Bridge No. 23C0092	SOL250205	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Solano	Solano County	Suisun Valley Bicycle and Pedestrian Imps	SOL130007	25-T09-134	Complete Streets Network | Regional
Solano	STA	Bike Trail Pedestrian Improvements	SOL230207	25-T09-134	Complete Streets Network | Regional
Solano	STA	I-80/I-680/SR 12 Interchange Improvements	SOL070020	25-T06-024	Interchange Improvements | I-80 | I-680 and SR-12, Packages 3-5
Solano	STA	I-80/I-680/SR 12 Interchange Phase 2A	SOL190024	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Solano	STA	Jepson: Leisure Town Road Phase 1B and 1C	SOL110006	25-T08-129	Roadway Widening | Jepson Pkwy- Leisure Town Rd, Phase 1B, 1C | Between Elmira Rd and Horse Creek Bridge
Solano	STA	Jepson: Vanden Road from Peabody to Leisure Town	SOL110003	25-T08-131	Roadway Widening | Jepson Pkwy- Vanden Rd, Phase 2B, 2C | Between Canon Rd and Vacaville City Limits
Solano	STA	Jepson: Walters Rd Ext - Peabody Rd Widening	SOL110004	25-T08-130	Roadway Extension | Jepson Pkwy- Walters Rd | Between Cement Hill Rd and Huntington Dr
Solano	STA	Solano Connected Mobility Implementation Plan	SOL210006	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Solano	STA	Solano Mobility Call Center	SOL170009	25-T01-001	Operate & Maintain the Existing System | Baseline | Public Transit Service Levels | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Solano	STA	Solano Regional Transit Improvements - TIRCP 2020	SOL190023	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Solano	STA	Solano Safe Routes to School Program	SOL110019	25-T10-135	Speed Limit Reductions Initiatives| Regional
Solano	STA	SolanoExpress Bus Electrification	SOL190002	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Solano	SolTrans	Door Access System	SOL250204	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Solano	SolTrans	Shop Equipment	SOL250203	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Solano	SolTrans	SolTrans: Bus Replacement	SOL090034	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Solano	Suisun City	New Railroad Avenue Pavement Rehabilitation	SOL170014	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Solano	Suisun City	Park N Ride Parking Lot EV Station Installation	SOL230208	25-EN8-184	Clean Vehicle Initiatives | Regional
Solano	Suisun City	Suisun City Pedestrian Crossing Improvements	SOL190007	25-T08-090	County Safety, Security and Other
Solano	Vacaville	H9-04-035 Vacaville Signal Improvements	SOL190006	25-T08-090	County Safety, Security and Other
Solano	Vacaville	H9-04-036 Vacaville Ped Crossing Enhancements	SOL190005	25-T08-090	County Safety, Security and Other
Solano	Vacaville	Mapping, Wayfinding & Real-time Arrival Signage	SOL250210	25-T02-009	Improve the Rider Experience through Transit Network Integration | Mapping and Wayfinding | Regional
Solano	Vacaville	Vaca Valley/I505 Multimodal Improvements	SOL170013	25-T06-029	Interchange Improvements | I-505| Vaca Valley Pkwy
Solano	Vacaville	Vacaville Pavement Preservation	SOL210002	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Solano	Vacaville	Vacaville: Electric Bus Charging Infrastructure	SOL210003	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Solano	Vacaville	Vacaville: Electric Bus Fleet	SOL210004	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Solano	Vallejo	H9-04-037 Vallejo: HSIP 6 HAWK Installation	SOL190009	25-T08-090	County Safety, Security and Other
Solano	Vallejo	H9-04-038 Vallejo HSIP 5 Pedestrian Crossings	SOL190008	25-T08-090	County Safety, Security and Other
Solano	Vallejo	Mare Island Causeway Bridge (23C0248) Preventative	SOL190016	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Solano	Vallejo	Sacramento Street Road Diet - Phase II	SOL230201	25-T09-134	Complete Streets Network | Regional
Solano	Vallejo	Vallejo Bay Trail / Vine Trail Gap Closure	SOL170008	25-T09-134	Complete Streets Network | Regional
Solano	Vallejo	Vallejo Bluff Trail Project	SOL250201	25-T09-134	Complete Streets Network | Regional
Solano	Vallejo	Vallejo Ferry Mobility Hub Improvement	SOL210007	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Solano	Vallejo	Vallejo Springs Rd Pavement Preservation	SOL210010	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Sonoma	Cotati	Cotati Downtown-Civic Center Connectivity Safety	SON210002	25-T10-135	Speed Limit Reductions Initiatives| Regional
Sonoma	Cotati	Highway 116/West Cotati Avenue Intersection Safety	SON250202	25-T08-093	Minor Roadway Improvements | Regional
Sonoma	Petaluma	Petaluma AVL Equipment	SON170017	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Sonoma	Petaluma	Petaluma River Trail	SON250201	25-T09-134	Complete Streets Network | Regional
Sonoma	Petaluma	Petaluma: (6) 40' Battery Electric Buses	SON230208	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Sonoma	Petaluma	Petaluma: Purchase 2 Replacement Fixed Route Buses	SON210006	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Sonoma	Petaluma	Petaluma: Transit Yard & Facilities Improvements	SON170005	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Sonoma	Rohnert Park	Hwy. 101 Bike/Ped Overcrossing at Copeland Creek	SON230204	25-T09-134	Complete Streets Network | Regional
Sonoma	Rohnert Park	Southwest Boulevard Complete Streets	SON210009	25-T09-134	Complete Streets Network | Regional
Sonoma	Santa Rosa	Downtown Connectivity to Support Housing Density	SON230206	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Sonoma	Santa Rosa	Highway 101 Bicycle and Pedestrian Overcrossing	SON170012	25-T09-134	Complete Streets Network | Regional
Sonoma	Santa Rosa	Highway 101 Hearn Avenue Multi-Use Pathway and Pav	SON230203	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Sonoma	Santa Rosa	Santa Rosa Southeast Greenway	SON250203	25-T09-134	Complete Streets Network | Regional
Sonoma	Santa Rosa	US 101 Hearn Ave Interchange	SON150006	25-T06-108	Corridor & Interchange Improvements | US-101 | Sonoma County
Sonoma	Santa Rosa City Bus	Santa Rosa Transit Mall Roadbed Rehabilitation	SON210001	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Sonoma	SCT - Sonoma County Transit	Sonoma County Transit: 40' Bus Replacement	SON250204	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Sonoma	SCTA	Highway 116/121 Intersection Improvement Project	SON150009	25-T08-093	Minor Roadway Improvements | Regional
Sonoma	SCTA	Sonoma County - County-Wide SRTS Program	SON170009	25-EN9-185	Transportation Demand Management Initiatives | Regional
Sonoma	SCTA	SR 121 at 8th Street East Intersection Improvement	SON230209	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Sonoma	SCTA	US 101 Marin/Sonoma Narrows (Sonoma)	SON070004	25-T07-072	Other Freeway/Highway Expansion Project Development Reserve | Regional
Sonoma	Sebastopol	Bodega Avenue Bike Lanes and Pavement Rehab	SON170021	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Sonoma	Sebastopol	SR 116 and Bodega Ave Pedestrian Improvements	SON210005	25-T09-134	Complete Streets Network | Regional
Sonoma	Sonoma County	Crocker Bridge Bike and Pedestrian Passage	SON170014	25-T09-134	Complete Streets Network | Regional
Sonoma	Sonoma County	Rehab King Ridge Bridge over Austin Crk 20C0433	SON070026	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Replace Chalk Hill Bridge over Maacama Crk 20C0242	SON090025	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Replace Freestone Flat Bridge over Salmon 20C0440	SON110026	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Replace Geysers Rd Bridge over Sulpher Crk 20C0005	SON090001	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Replace Hauser Bridge over Gualala River 20C0240	SON110025	25-T01-006	Operate & Maintain the Existing System | Toll Bridges | Regional
Sonoma	Sonoma County	Replace Lambert Bridge over Dry Creek 20C0248	SON090026	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Replace W Dry Creek Rd Bridge over Pena Ck 20C0407	SON090027	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Sonoma County Bridge Preventive Maintenance	SON190006	25-T01-003	Regional and Local Bridges - Exisiting Conditions
Sonoma	Sonoma County	Todd Road and Standish Avenue Intersection Improve	SON230202	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Sonoma	Sonoma County Regional Parks	Joe Rodota Trail Bridge Replacement	SON170025	25-T09-134	Complete Streets Network | Regional
Sonoma	Sonoma County Regional Parks	Sonoma County - West County Trail Gap Closures	SON230001	25-T09-134	Complete Streets Network | Regional
Sonoma	Windsor	Downtown Bike/Ped US 101 Crossing Underpass Wide	SON230201	25-T09-134	Complete Streets Network | Regional
Various	ACTC	I-680 Express Lane Striping and Signing	VAR250210	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	BAIFA	ALA/CC-80 and Bay Bridge Approach Express Lanes	VAR170003	25-T07-070	Express Lane Network Project Development | Regional
Various	BART	Electric Vehicle Charging at BART Stations	VAR230207	25-EN8-184	Clean Vehicle Initiatives | Regional
Various	Caltrain	Caltrain Grade Crossing Improvements	VAR250204	25-T11-174	Grade Separations and Modernization | Regional
Various	Caltrain	Fencing for Caltrain Right of Way	VAR230202	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Various	Caltrans	GL: Bridge Rehab and Reconstruction - SHOPP	VAR170010	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Various	Caltrans	GL: Bridge Rehab/Recon. - Local Hwy Bridge Program	VAR170012	25-T01-003	Operate & Maintain the Existing System | Local Bridges | Regional
Various	Caltrans	GL: Emergency Repair - SHOPP Emergency Response	VAR170008	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Fed Lands Highways Pgm-Tribal Transport Pgm	VAR210002	25-T01-004	Operate & Maintain the Existing System | Local Streets & Roads & Bicycle/Pedestrian | Regional
Various	Caltrans	GL: Highway Safety Improvement Program	VAR170002	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Pavement Resurf./Rehab - SHOPP Roadway Presv.	VAR170006	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Pavement Resurfacing/Rehab SHS - Highway Maint	VAR170004	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: PROTECT Planning Studies	VAR230201	25-T08-091	Planning/Program | Regional
Various	Caltrans	GL: Pvmt Resurf/Rehab State Hwy Sys - SHOPP Minor	VAR190001	25-T01-002	Operate & Maintain the Existing System | Highways | Regional

County	Sponsor	Project Name	TIP ID	RTP ID	RTP Title
Various	Caltrans	GL: Railroad-Highway Crossing	VAR170017	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Recreational Trails Program	VAR190009	25-T09-134	Complete Streets Network | Regional
Various	Caltrans	GL: Safety Improvements - SHOPP Mandates	VAR170009	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Safety Improvements - SHOPP Mobility Program	VAR170005	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Safety Imprv. - SHOPP Collision Reduction	VAR170007	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	GL: Shoulder Imprv - SHOPP Roadside Preservation	VAR170011	25-T01-002	Operate & Maintain the Existing System | Highways | Regional
Various	Caltrans	TMS and HOV Bypass Lanes in ALA, CC & SOL Counties	VAR190010	25-T06-018	Other Investments to Modernize Freeways and Interchanges | Regional
Various	GGBHTD	GGBHTD - Zero Emissions Bus Replacement	VAR230209	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Various	GGBHTD	GGBHTD ZEB Infrastructure	VAR230203	25-T01-007	Operate & Maintain the Existing System | Zero-Emission Fleet Transition | Regional
Various	MTC	Bay Bridge Forward Preliminary Engineering	VAR210007	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	BBF I-80 Localized Transit/HOV Strategies	VAR250208	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	BBF: I-80 HOV Lane Access Restrictions	VAR250206	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	Bike Share Capital Program	VAR170024	25-EN9-185	Transportation Demand Management Initiatives | Regional
Various	MTC	Dumbarton Bike Access Improvements	VAR250203	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	Dumbarton Forward - Operational Improvements	VAR250209	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	Freeway Performance Program: SR-84	VAR170023	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	GL: Bus Accelerated Infrastructure Delivery	VAR230208	25-T11-137	Other Investments to Enhance Transit Reliability, Frequency, and Capacity | Regional
Various	MTC	GL: FTA 5311 Rural Area FY21-FY25	VAR210001	25-T01-001	Operate & Maintain the Existing System | Baseline | Public Transit Service Levels | Regional
Various	MTC	GL: FTA Section 5310 Program FY20 - FY25	VAR210201	25-T01-005	(blank)
Various	MTC	GL: Lifeline Transportation Program Cycle 5 and 6	VAR170025	25-T01-001	Operate & Maintain the Existing System | Baseline | Public Transit Service Levels | Regional
Various	MTC	GL: Transit ADA Operating Support	VAR210003	25-T02-010	Improve the Rider Experience through Transit Network Integration | Paratransit Enhancements and Coordinated Services Plan Implementation | Regional
Various	MTC	GL: Transit Operating Assistance	VAR190006	25-T01-001	Operate & Maintain the Existing System | Baseline | Public Transit Service Levels | Regional
Various	MTC	GL: Transit Preventive Maintenance	VAR190007	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Various	MTC	I-880 Optimized Corridor Operations	VAR210008	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	Marin-Sonoma US 101 Adaptive Ramp Metering	VAR250202	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	Mobility Hubs-Parking Management Planning and TA	VAR230204	25-T08-091	Planning/Program | Regional
Various	MTC	Priority Production Area Pilot Program	VAR230205	25-T08-091	Planning/Program | Regional
Various	MTC	Safe Streets for All (SS4A) - Planning & Demo	VAR250205	25-T10-135	Speed Limit Reductions Initiatives| Regional
Various	MTC	SM&SCL US 101 Optimized Corridor Operations	VAR250207	25-T06-017	Bay Area Forward Program | Regional
Various	MTC	SR 37 Interim Project - Sears Point to Mare Island	VAR210004	25-T07-083	HOV Lane, Tolling and Express Bus| New Lane | SR-37 | Between SR- 121 and Mare Island ("Interim Project")
Various	MTC	Technical Assistance Mobility Hub Pilot Program	VAR210006	25-T11-136	Other Investments in Transit Stations, Centers, and Stops | Regional
Various	MTC	Transportation Electrification Planning Program	VAR230206	25-T08-091	Planning/Program | Regional
Various	SMART	SMART Fiscal Year 2025 5337 State of Good Repair	VAR250201	25-T01-005	Operate & Maintain the Existing System | Public Transit Capital Assets | Regional
Various	SMART	SMART Rail and Pathway (Phase 2)	VAR210005	25-T12-181	Rail | Service Expansion | SMART | Healdsburg

375 Beale Street, Suite 800
San Francisco, CA 94105

File #: 26-0252, **Version:** 1

Subject:
Next-Generation Clipper Update

Update on the Next-Generation Clipper system, highlighting the program's background and development history, as well as implementation progress of the new account-based platform and transitioning current Clipper users.

Presenter:
Jason Weinstein, MTC

Recommended Action:
Commission Information

Metropolitan Transportation Commission

March 25, 2026 **Agenda Item 11a - 26-0252**

Next-Generation Clipper Update

Subject:

Update on the Next-Generation Clipper system, highlighting the program's background and development history, as well as implementation progress of the new account-based platform and transitioning current Clipper users.

Background:

The Bay Area's move to the Next-Generation Clipper (C2) system marks the latest step in a 25-year regional effort to modernize and unify fare payment across 22 transit operators, one of the most complex multi-operator environments in the country. From the region's first TransLink pilot in 1999 through the launch of the Clipper card in 2010, the goal is consistent: provide a seamless, reliable, customer-centered fare payment experience for millions of riders. The transition to C2 is the most significant update to this system since Clipper's original debut.

Implementation Progress

The C2 system launched on December 10, 2025, offering both account-based Clipper cards and credit and debit card payments for all Bay Area Operators while supporting operations of the legacy card-based system until all cards are transitioned to the new system. Significant operational challenges continue to affect C2 customers and transit operators, and MTC has been working daily with the System Integrator Contractor, Cubic, and transit operator staff to deploy fixes and address system stability concerns. At the same time, adoption continues to grow with approximately 1.2 million Clipper cards (~8%) have migrated to the new system, and in February riders completed approximately 4.0 million account-based trips (~31%) using either account-based cards (~22%) or contactless credit or debit cards (~9%). Clipper usage remains strong with higher Clipper utilization rates as compared to this same time last year.

Since launch, Cubic has deployed fixes to address ongoing issues that continue to affect customers and transit operators. Priority concerns include customer account access, migration

errors requiring manual correction, financial settlement discrepancies, system stability, and reliability issues with some fare inspection devices, vending machines, and customer service tools. Daily coordination with Cubic continues, supported by weekly executive-level reviews and structured tracking of these priority issues.

In particular, customer account access, migration errors and issues with the customer service tools have led to larger than expected call volume, long waiting times and unanswered calls, which is frustrating for customers. WSP, which operates the Next Generation Clipper customer service center, has taken actions to improve the customer experience:

- In February:
    - Increased the hours of operation, which are now 7:00 a.m. to 6:00 p.m. (Two additional hours a day, Monday through Friday; Saturday hours will remain 9:00 a.m. to 1:00 p.m.)
    - Hired additional full-time and part-time customer service agents
    - Expanded email capabilities and enhanced case management
- Ongoing activities:
    - Working on system updates to implement call back options
    - Training customer service agents to reduce handle times

MTC staff, working with transit operator partners, will continue to actively monitor system performance and hold Cubic accountable for issue resolution through weekly executive status reporting and daily commitment tracking. The recommended path forward is to ensure accountability to fix the critical issues while maintaining service continuity and focus on the customer experience for Bay Area transit riders. Staff's current focus is on delivering a functional C2 system in the shortest time possible, while tracking lost revenue and other direct costs that may be recoverable under our contract. Staff will continue to prioritize system fixes to improve the customer experience, monitor Cubic's delivery against commitments, and prepare updated customer migration plans. A major software update is scheduled for deployment before the March 25 Commission meeting, and staff will provide an update on its effectiveness during

the meeting. Cubic executives are anticipated to be in attendance at the March 25, 2026 Commission meeting.

Attachments:

- Attachment A: Next-Generation Clipper Background
- Attachment B: Presentation

Andrew B. Fremier

Attachment A: Next-Generation Clipper Background

Overall Background:

The original regional fare payment system, TransLink, began in 1999 under a contract with Motorola. In 2008, Cubic Transportation Systems assumed the contract and successfully launched the Clipper brand in 2010, processing 22.4 million monthly transactions by 2016.

The current Clipper system (C1) launched in 2010 and serves 22 transit operators with 94% customer satisfaction. However, after 15 years of operation, the underlying technology infrastructure was reaching end-of-life, with critical components becoming unsupportable by manufacturers. Planning for a next-generation system began in 2013 to modernize the technology while maintaining service for over 900,000 daily riders.

Planning and Preparation (2013-2015):

In 2013, MTC and Bay Area transit agencies began planning for the next-generation Clipper (C2). The Commission in 2014 issued a Request for Proposals for consultant support to design, procure and oversee implementation of the C2 system. After a competitive process that drew interest from 17 firms, a $5 million contract with IBI Group was executed in 2015.

System Integrator Procurement (2016-2018):

MTC in 2016 launched a methodical procurement process for the system integrator:

- April 2016: Request for Expressions of Interest (RFEI) released – 18 firms responded.
- January 2017: Draft Scope of work released for industry review– 18 firms provided feedback
- September 2017: Final RFP released
- March 2018: Single proposal received from Cubic Transportation Systems
- August 2018: Multiple Best and Final Offer (BAFO) rounds to optimize terms

Despite extensive industry outreach and a properly structured competitive process, the market delivered a single bidder. This reflects the limited global vendor pool for complex, multi-operator regional transit payment systems. Cubic's incumbency provided unique advantages:

intimate knowledge of the existing C1 system, established relationships with all 22 transit operators, and understanding of the region's complex fare policies and integration requirements.

The Clipper Executive Board in September 2018 voted 9-0 to recommend award of the system integrator contract to Cubic for $461 million. MTC unanimously approved the selection on September 26, 2018, and executed the contract that same day.

Why Clipper Is Uniquely Complex:

- **Operators:** Clipper serves 22 transit operators, compared to systems operated by single regional authorities even when those systems serve multiple counties or transit modes (New York's MTA, Washington, D.C.'s WMATA, Boston's MBTA)
- **Payment Modalities:** Clipper delivers card-based, account-based, and open payments simultaneously with full feature parity, while systems like NYC's OMNY and DC's enhanced SmarTrip focused primarily on adding open payments to existing card infrastructure
- **Governance:** Clipper operates through a nine-member Clipper Executive Board representing all 22 transit operators, requiring consensus decision-making across independent agencies.
- **Regional Integration:** Complex fare policies, transfers across 22 operators, and regional fare products require significantly more integration work than unified single-operator fare structures

This complexity helps explain implementation challenges but does not excuse execution failures.

What C2 Was Designed to Deliver:

One of the main goals for the Next generation Clipper was to minimize the transition impact to the customer. With Cubic as both the current and next-generation system operator, through early negotiations, the new system was able to leverage the existing card-based functionality, while providing early deployment of new equipment and mobile wallet use. This created the potential for a seamless customer transition to the new system without having to distribute all new cards with two side-by-side operational systems, which would be confusing for customers.

The new system design purposely distributed several functions away from the System Integrator, such as the call-center, card procurement, and the credit/debit payment services. In addition, the new system provides open-payments capability, and account-based operations while also enabling regional integration features such as transfers between operators; regional day passes; discount programs; and institutional programs such as employer-provided Clipper BayPass products.

Implementation Timeline (2019-2025):

- 2019-2021: Design and early implementation of accelerated deployment capabilities, such as Mobile Wallet integration with Apple and Google and rollout of bus and platform readers.
- April 2022: Contract Amendment for Revised Delivery Approach (see below)
- 2023-2024: System testing, operator equipment deployment, and integration across all agencies. October 20, 2025: Launch Date Approved

  After deferring the original December 2024 go-live date when system-readiness issues were identified, the Clipper Executive Board set December 10, 2025, as the new customer transition date, with remaining open items documented and tracked, and acknowledgment that some of the required functionality would be allowed to be phased in after launch.
- December 10, 2025: System Launch

  Customer transition began on December 10, 2025, with the start of on-demand migration of C1 customers into the C2 system operational across all 22 operators.

Current Status:

The next generation Clipper system is now operational across all 22 transit operators; however, significant operational challenges remain. These include financial settlement discrepancies that prevent daily reconciliation; overwhelming customer service demand driven by system issues; fare inspection device failures affecting operator revenue collection; ongoing mobile wallet and account access issues affecting thousands of customers, and the need for longer-term fixes to address system stability issues.

Cost Evolution - Transparent Board Oversight:

All increases were reviewed and recommended for approval by the Clipper Executive Board before being approved by the MTC Operations/Regional Network Management Committee and/or Commission:

Cubic Transportation Systems Contract Additions:

- Original Contract (September 2018): $461 million – **Includes 10 years of operations and maintenance**
- Open Payments/Tap to Ride (November 2020): $13.6 million
- Mobile Provider Fees (October 2021): $15 million
- Additional Operator Support (September 2023): $8.4 million
- Current System O&M Extension (September 2024): $20 million
- Emergency Transition Support (December 2024): $4.5 million
- Other Cubic change orders: approximately $10 million

Cubic Subtotal: approximately $532 million

Other Major Clipper-related Contracts (separate procurements):

- WSP USA - Customer Service Operations: $26 million+
- IBI Group/Arcadis - Technical Advisor: $11.7 million+
- MIG Inc. - Public Outreach and Community Engagement: $8 million+
- Paragon ID - Fare Media Production: $10.3 million
- Various system integration contractors: approximately $15 million

Total Program Cost: approximately $603 million

The Clipper Executive Board maintained regular public oversight throughout the implementation period, with 89 meetings from 2016 through 2025. This ensured all major decisions, cost changes, and schedule adjustments were properly documented and approved.

Contract Provisions, Accountability, and Path Forward:

The contract provides for certain methods of redress for underperformance by Cubic. There are strategic considerations to be made about what is likely to be most effective in getting us to the earliest date for full functionality. Staff are currently engaged in evaluation of our options.

There are a number of protective provisions included in the contract (Lost Revenue Recovery (Article 12.4.1); Liquidated Damages (Article 3.3); Payment Offsets; Bonds (Article 14.2); and Terminations (Articles 18.2 and 18.3).

MTC staff, working with transit operator partners, are actively monitoring system performance and holding Cubic accountable for issue resolution through weekly executive status reporting and daily commitment tracking. Staff's current focus is on delivering a functional C2 system in the shortest time possible, while tracking lost revenue and other direct costs that may be recoverable under our contract. This is a dynamic situation, and we will keep the Commission apprised of major developments as they occur. The recommended path forward is to ensure accountability to fix the critical issues while maintaining service continuity and focus on the customer experience for Bay Area transit riders.

Next-Generation Clipper Update

MTC Commission
Agenda Item 11a
March 25, 2026

METROPOLITAN TRANSPORTATION COMMISSION

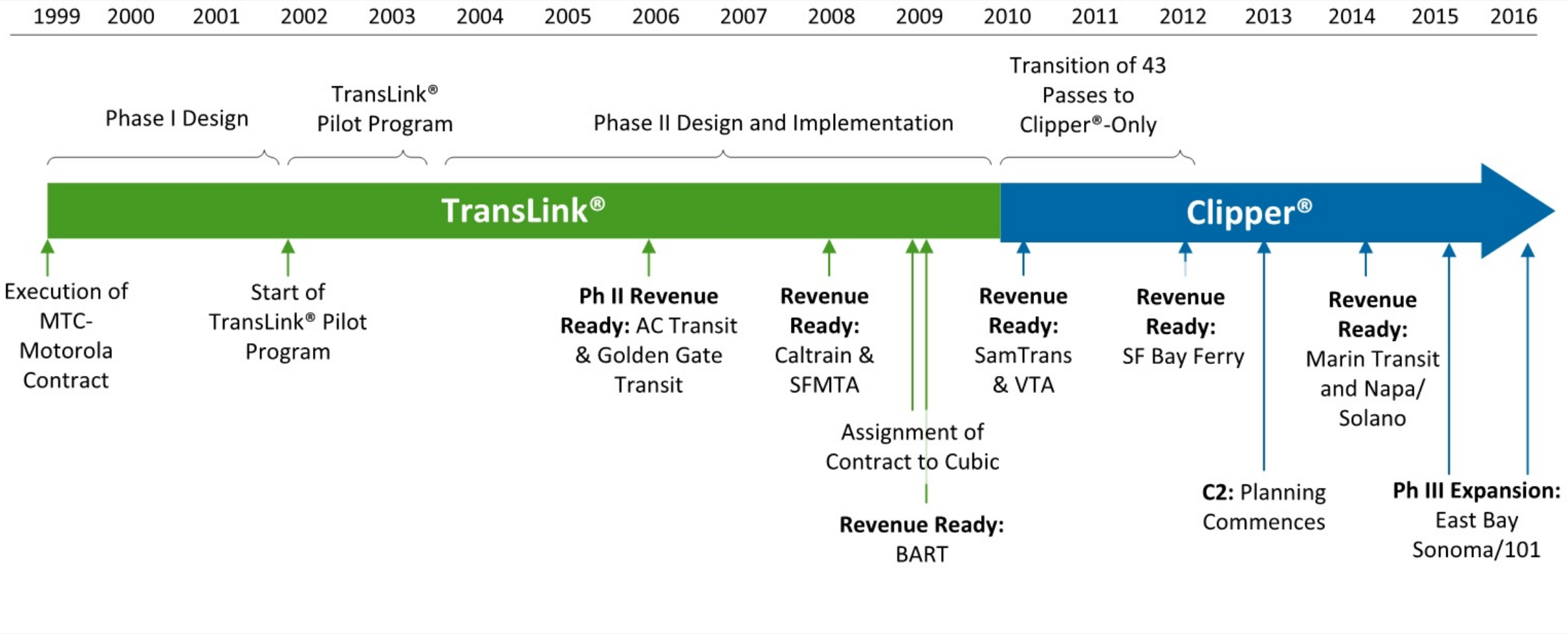
Clipper Vision

22 Transit Operators – Creates a unified transit experience across the Bay Area

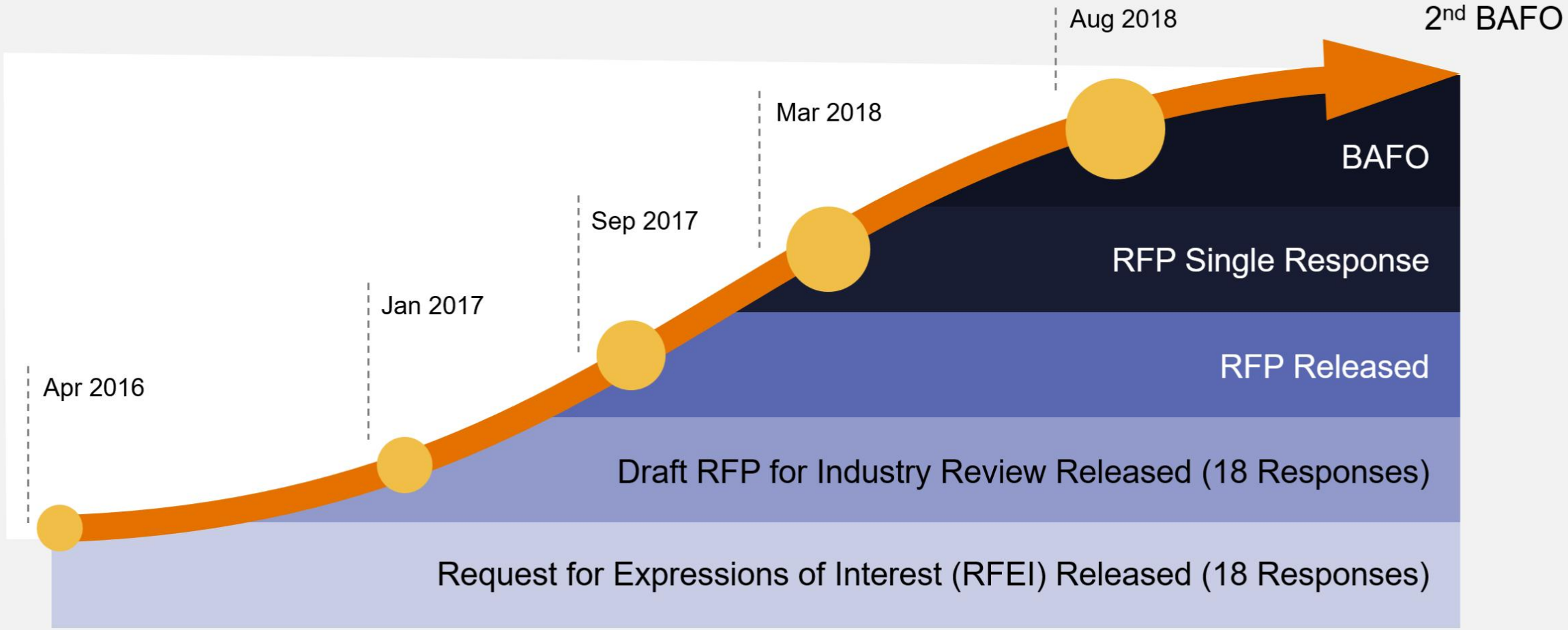
Clipper Executive Board – Provides foundational regional governance and fosters collaboration

Simplifies Complexity – In one of the nation's most complex transit regions

Program Timeline – 1999 - 2016



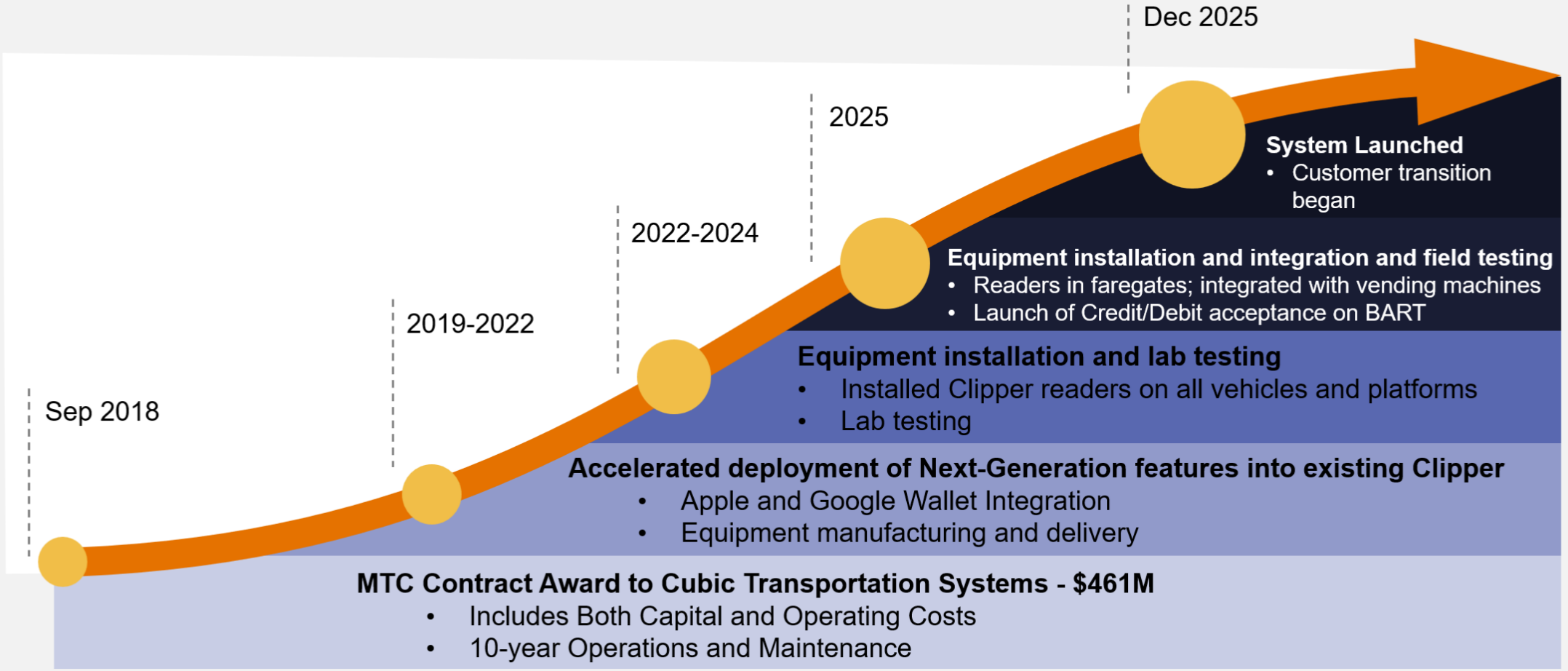
Procurement Timeline – 2016 - 2018



Next Generation Clipper

- All New Equipment
- Real-Time Value Availability
- Mobile Clipper Cards in Phone Wallets -
- Contactless Credit/Debit Card acceptance -
- Regional Transfer Discounts
- Supports Transit Agency Promotions
- Supports Existing Equity Programs

Implementation Timeline – 2018 - 2025

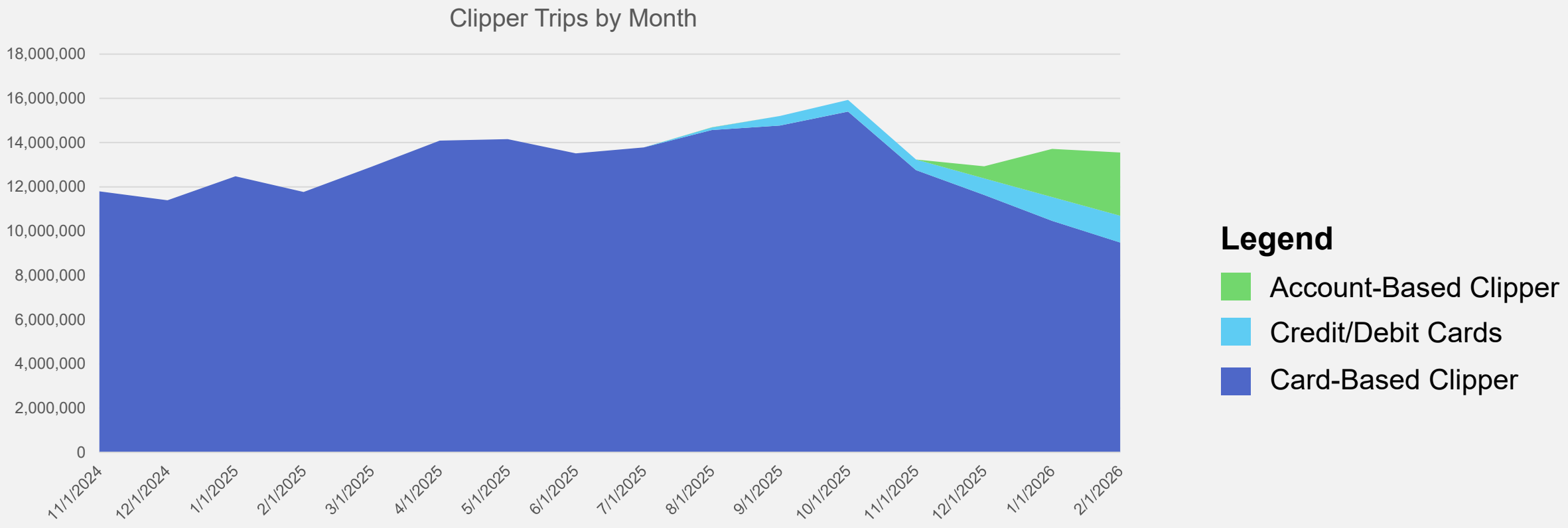


Launch Status

- C2 launched Dec 10, 2025; system is live but operating in stabilization mode
- ~1.2 million cards migrated via on-demand process
- On-going operational challenges resulting in the following actions;
  - Daily coordination between MTC, Cubic, and Transit Operators
  - Resolving issues for customer's affected by the launch
  - Large scale (bulk) migration on hold until critical customer issues are resolved

All Clipper Trips by Month

- Overall, Clipper usage remains strong with higher usage levels compared with this same time last year
- Riders completed approximately 4.0 million account-based trips in February(~31%)
  - account-based Clipper cards (~22%) and contactless credit or debit cards (~9%).



System Issues Affecting Customers

- **Account migration problems** have affected some customers, including missing passes, dropped autoloads, mobile card conversion issues, and difficulty accessing accounts and travel history. Using workarounds to assist and make customers whole.
- **System stability remains a priority concern.** Multiple service interruptions have occurred since launch, and infrastructure capacity improvements continue to be deployed.
- **Ticket Vending Machines (TVMs)** remain unreliable or slow, limiting customers' ability to obtain or load value; **fixes are in progress.**
  - Muni: Updates are in progress for improved diagnostics and missing functionality (token acceptance, ticket reloading)
  - BART: Updates planned to improve transaction speed; timeline pending.

System Issues Affecting Customers

- **Customer Service Terminals (CSTs)** Fixes completed allowing for card replacement and youth card issuance. Additional functionality improvements are in progress.
- **Fare Inspection Devices (FIMPS)** at times have limited functionality, causing friction for customers who have paid correctly.
  - Updates are in progress for credit/debit card inspection and to address reliability issues.
  - Fixes are in development for slow performance, login failures, and card read accuracy.
- **Financial settlement processes** require additional improvements for operators and MTC.
  - Lag time has improved and additional work is in progress to achieve next-day settlement and resolve settlement variances.

Contact Volumes and Customer Wait Times

- Average answer time is modestly improving, but we have work to do to meet expectations

- Between 1500 and 2500 calls offered to customer service agents weekdays and ~500 call on Saturday (the blue bars above).
- Customer service performance has modestly improved with extended hours and additional staffing (orange line above)

Customer Service Progress

- In February:
  - Increased hours of operation to 7:00 a.m. to 6:00 p.m.
    (2+ additional hours Monday through Friday; Saturday hours will remain 9:00 a.m. to 1:00 p.m.)
  - Hired additional full time and part time agents
  - Expanded email capabilities and enhanced case management
- Ongoing Activities:
  - Working on system updates to implement call back options
  - Training customer service agents to reduce handle times

Advancing Forward, But Not Finished

- **System Stability –** System stability remains a priority concern. Infrastructure improvements continue to be deployed.
- **Financial Processing –** Settlement reporting and timing improved. Further improvements are needed to achieve next-day settlement; variance reconciliation ongoing.
- **Customer Service –** Extended call center hours in February. System improvements are in progress to reduce call center volumes.
- **Equipment Improvements –** Updates for fare inspection devices, customer service terminals, and ticket vending machines in progress. Some fixes are workarounds that require permanent solutions.
- **Software Updates –** Fixes for critical issues considered blockers to migration ramp-up.

Vendor Executive Remarks

Cubic Transportation Systems
Peter Montgomery-Torrellas
President

Next Steps

- Deploy latest software updates to address issues
- Continue resolving issues affecting customers and operator staff
- Evaluate and monitor customer service center improvements
- Only after customer issues are resolved and system stability is demonstrated, move forward with large scale (bulk) migration of Clipper customers
- Assess impacts on FY 26/27 budget

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