



# 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:**

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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 <sub>2</sub> e | metric tons of carbon dioxide equivalent                                                        |
| NOA                 | Notice of Availability                                                                          |
| NO <sub>x</sub>     | 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 <sub>2.5</sub>   | fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less      |
| PM <sub>10</sub>    | 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](mailto: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](http://mtc.ca.gov)), Plan Bay Area ([planbayarea.org](http://planbayarea.org)) and ABAG ([abag.ca.gov](http://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              |
|-----------------|---------------------------------------------------------------------------------------|-------------------|
| <b>Agencies</b> |                                                                                       |                   |
| 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 |
| <b>Organizations</b>       |                                                                                                      |                   |
| 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 |
| <b>Individuals -Emails</b> |                                                                                                      |                   |
| 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 |
| <b>Public Hearings</b> |                        |                   |

| 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  |
| <b>Individuals -Online Forms</b> |                  |                   |
| 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 evolution 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 7<sup>th</sup> Cycle Regional Housing Need Determination (RHND).

The regional growth forecast prepared for Plan Bay Area 2050+ has no influence on the 7<sup>th</sup> 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 be 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 rationale 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 judgments 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.<sup>1</sup>

#### 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](mailto: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 inconsistencies 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 PM<sub>2.5</sub> 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<sub>2.5</sub>. 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 Draft 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 short-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<sub>2.5</sub>) 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<sub>2.5</sub>. The Draft EIR concludes that the proposed plan could result in changes in total PM<sub>2.5</sub> exposure levels that disproportionately 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 firehardening 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. Noeltting:

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 PM<sub>2.5</sub> 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%~~ 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 (BAWSA), 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, BAWSA, 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<br>Increase | 2020-2050<br>% Increase | 2020-2050<br>Ann. Incr. (1) | Annual Increase<br>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) Arithmetic 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 require 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

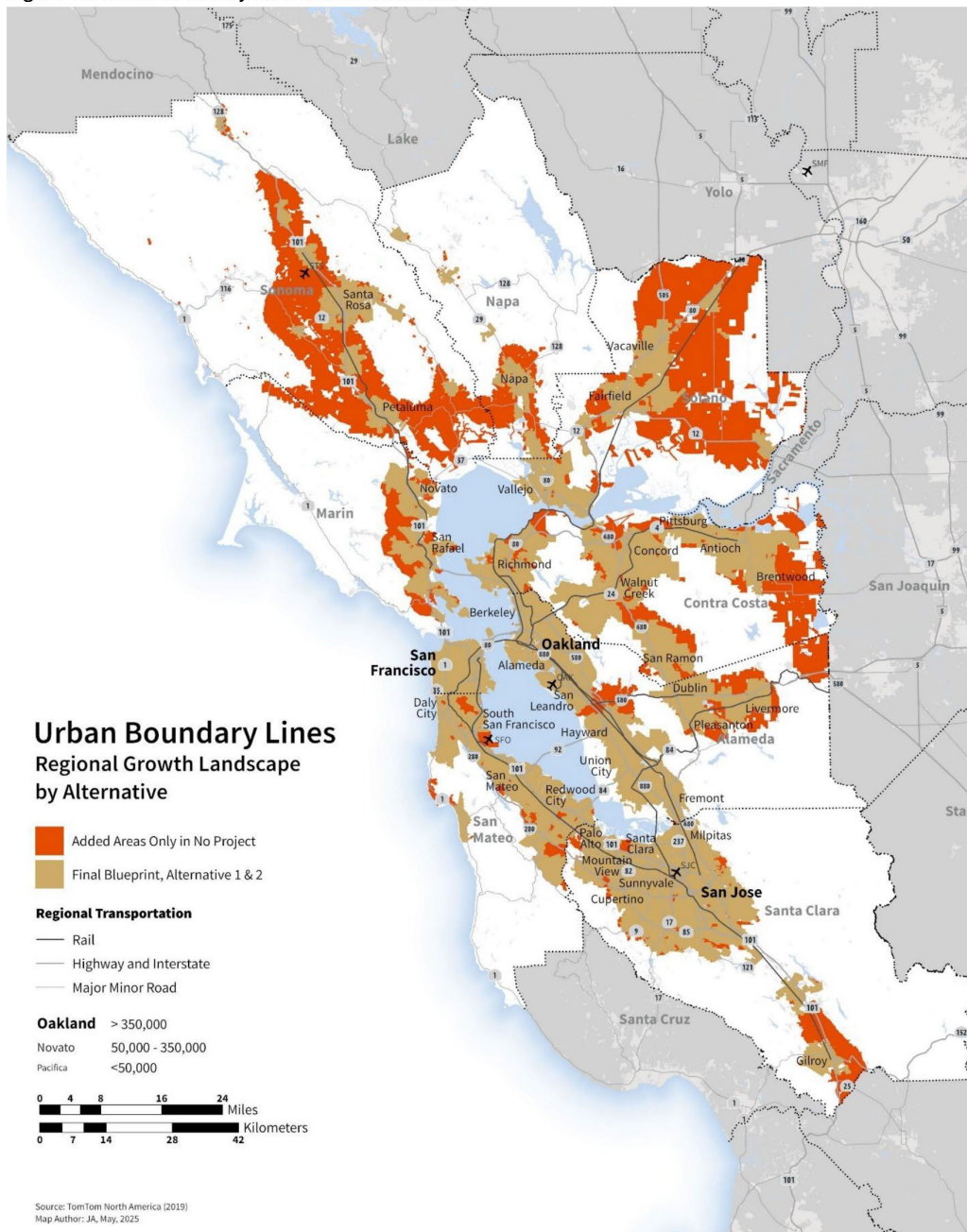
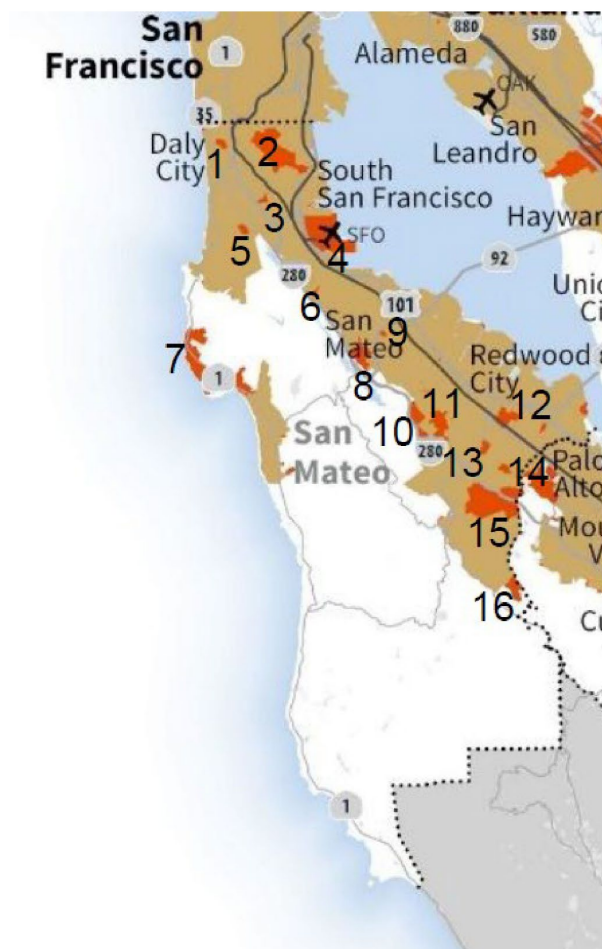
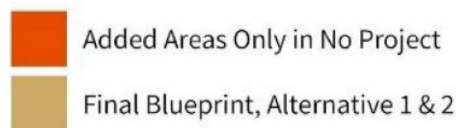


**FIGURE 2**

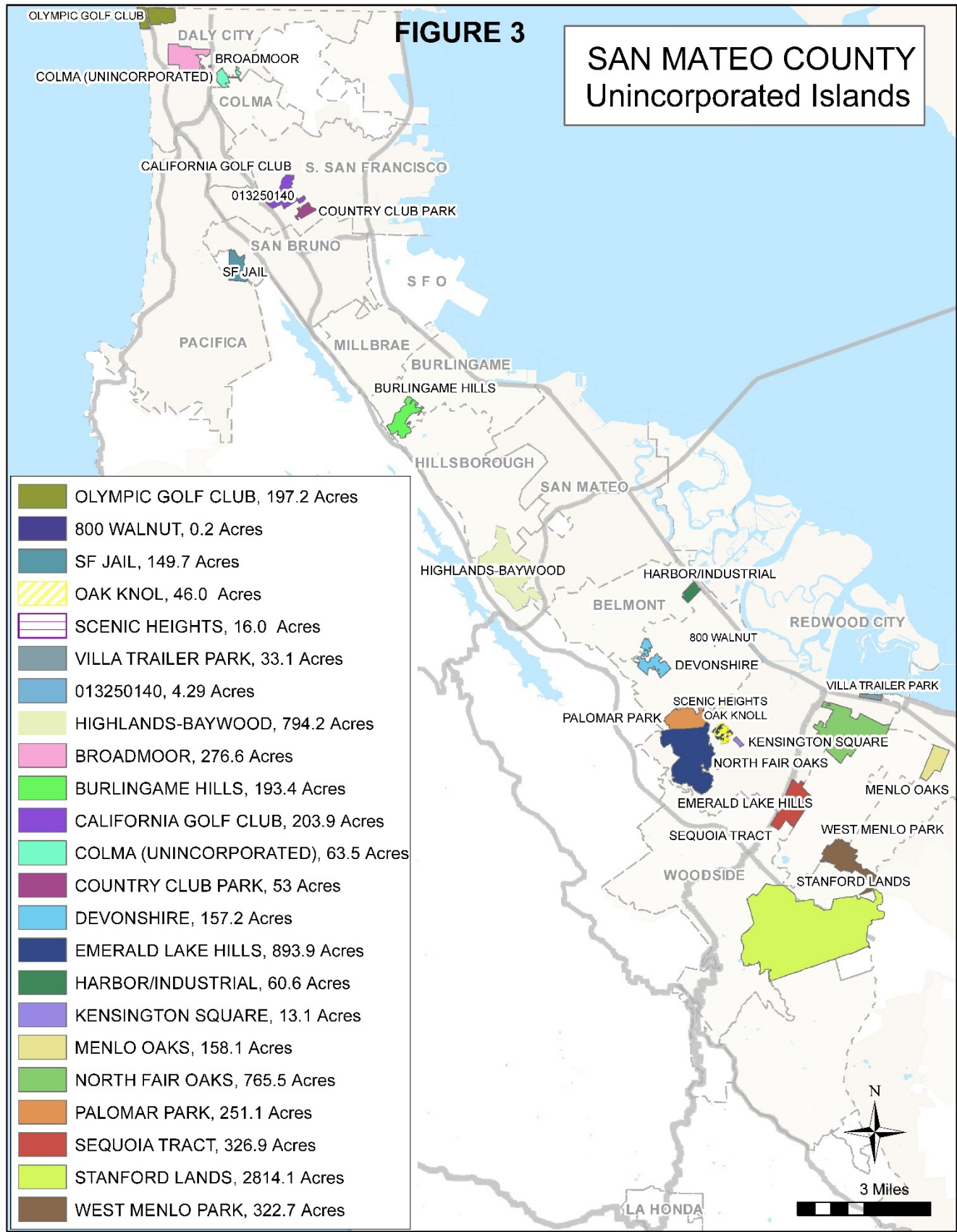
# Urban Boundary Lines Regional Growth Landscape by Alternative



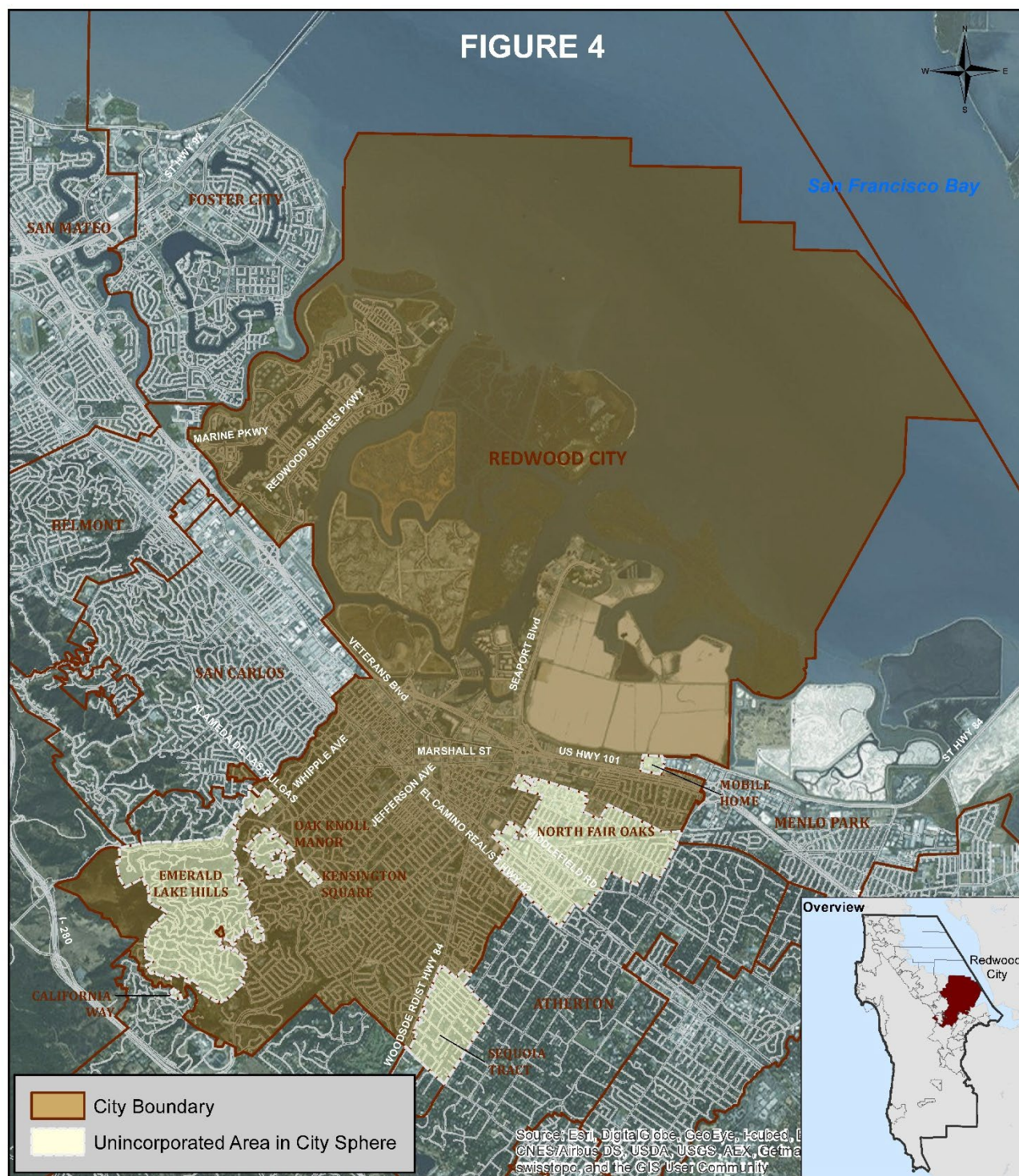
## SAN MATEO COUNTY

### **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







**LOCAL AGENCY FORMATION COMMISSION**  
495 COUNTY CENTER, 2ND FLOOR • REDWOOD CITY, CA 94063-1063 • PHONE (650) 363-4224 • FAX (650) 363-4849



**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](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 [tle@fostercity.org](mailto:tle@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, “Public Services and Recreation” to provide up-to-date information related to 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 A13-5

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@bcdcc.ca.gov](mailto:lisa.herron@bcdcc.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.”

**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 Innovation 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 reevaluating 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](mailto: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](mailto: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](mailto: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 ~~strike through~~, additions in underline.

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~~ 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 ~~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****Stronger Emphasis on Agricultural Lands**

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<sub>2</sub> 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 PM<sub>2.5</sub> 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**Local Land Use Control

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 \$5M over 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 Chapter 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.

## 2. Project Description

Plan Bay Area 2050+

**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 “Master 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](mailto: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](http://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](http://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](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 PM<sub>2.5</sub> emissions would increase in the plan area as would total PM<sub>2.5</sub> 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 of 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****MTC/ABAG Growth Forecasts for the Bay Area are Overstated and Significantly Diverge from Standard and Recognized Projection Practice**

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 “Master 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 accompli.

**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 do 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](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 Order 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 commuters” 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. The Plan's Mitigation Measures Are Inadequate (Table 4-34: Summary Comparison of EIR Impacts: Proposed Plan and Alternative Plans)**

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 of 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 via 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]

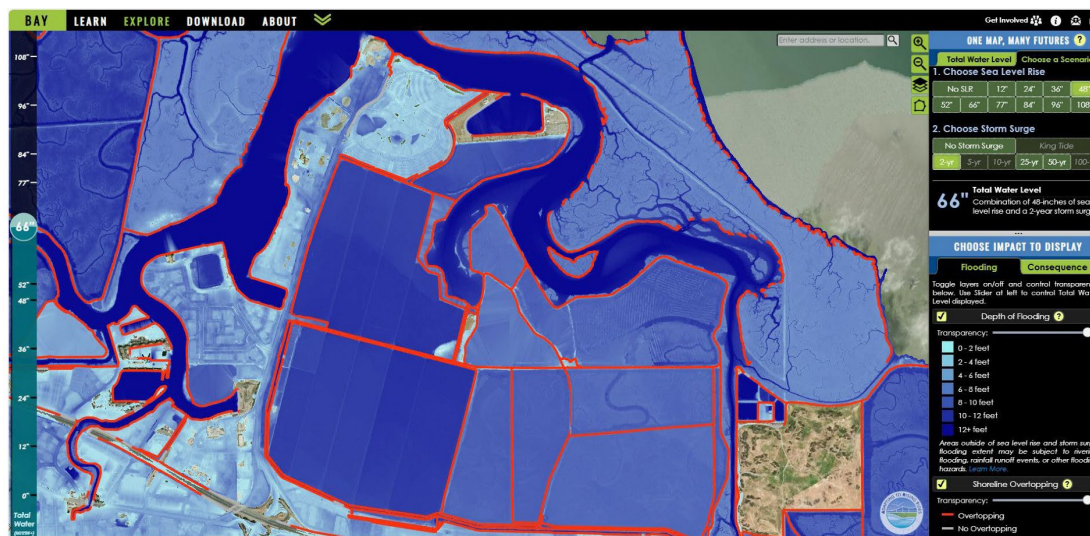
What determines whether a "Transit Rich Area" is a "select Transit-Rich Area"? Given the sea level rise concerns, the potential for significant impacts to biological resources, and the potential significant growth inducing impact, this "Transit Rich Area" should not qualify for "streamlined review;" 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<sup>1</sup> 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.

<sup>1</sup> 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 nature-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. Biological Resources Section**

### **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<sup>2</sup>, the *2015 Bay Ecosystem Habitat Goals Update*<sup>3</sup>, the *Adaptation Atlas*<sup>4</sup>, and *Tracking Tidal Wetland Extent in San Francisco Bay: A 2020 mapping update*<sup>5</sup>. 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*”<sup>6</sup> 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.htm#:~:text=Wetland%20vegetation%20works%20as%20a,blooms%20or%20human%20health%20hazards.](https://www.mywaterquality.ca.gov/eco_health/wetlands/extent/types/services.htm#:~: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<sup>7</sup>, 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 or federal regulatory oversight (e.g. for lightly developed or undeveloped lands that could support tidal marsh migration space).

<sup>7</sup> 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”<sup>8</sup> 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.”*

<sup>8</sup> 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 Chapter 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<sup>9</sup> 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<sup>10</sup> 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 interdependencies 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.

10Wang, 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<sup>11</sup> 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<sup>12</sup> 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.

<sup>11</sup>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.

<sup>12</sup>*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.<sup>1</sup> 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 onto Patterson Pass Road. Construction of an operations and maintenance 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 be 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](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 quality 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 of 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 California (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 Chapter 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 through 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 applicable 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 Draft 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 Section 1.93 (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 Draft 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](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 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<sub>2</sub> 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 not 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 at 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 not 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.

- 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.
- 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 they 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.)
- 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.
- Parking pricing includes congestion pricing to keep the occupancy rate from exceeding an agreed-upon value. This applies to shared parking, not assigned parking.
- 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 at 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/ABAG 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 forecasts, 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          |                    |                       |
| <b>Bay Area total</b> | <b>7,765,640</b> | <b>7,608,687</b> | <b>7,656,691</b> | <b>8,149,816</b> | <b>5% increase</b> | <b>6.4 % increase</b> |

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](mailto: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 1<sup>st</sup> 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 (starting 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](mailto: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](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](mailto: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 Tiburon 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 UNFEASIBLE AND, THEREFORE, REQUIRES A TOTAL REDO**

The following excerpts are from the Notice of Preparation for the PBA2050+ EIR<sup>1</sup>, the former from page A-4<sup>2</sup> of the Appendix, the latter from page A-3<sup>3</sup>:

<sup>1</sup> [2025-0000009\\_Draft\\_EIR\\_for\\_Plan\\_Bay\\_Area\\_2050.pdf](#)

<sup>2</sup> 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.

<sup>3</sup> 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 <sup>1</sup> | New Revenues <sup>2</sup> | 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<sup>4</sup>): \$260,266

<sup>4</sup> 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 representative 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 than 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 a 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 Investment” 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 or 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<sup>5</sup>, 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 optimistic.).

<sup>5</sup> 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 confirmation: 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/month (\$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 decreased public support for this strategy (existing to partial), especially among elected officials. There remains support for this strategy, but it is more mixed than previously.

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 optimistic 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 insufficient 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 optimistic 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 regard 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 attracting new low-income beneficiaries, particularly on other sectors of government, such as education, health care, first responders, 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 fraudulent 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 fraudulent 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 this program reasonably secure would be significant, 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

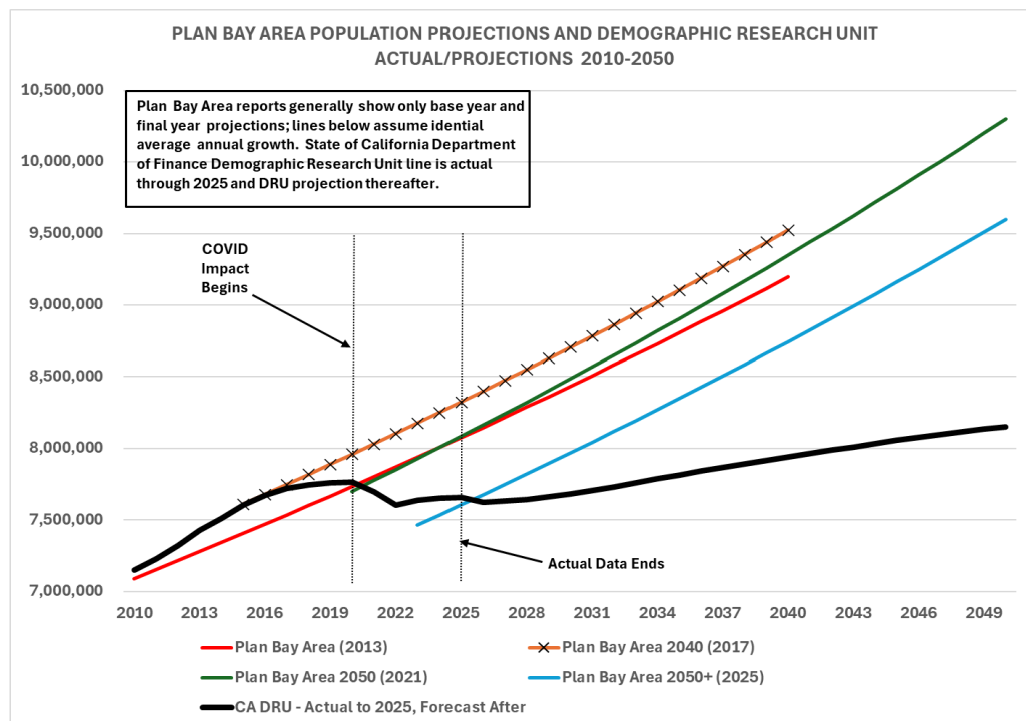
#### Population Projections

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<sup>6</sup>.

<sup>6</sup> 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; in 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 optimistic – was increased in each of the subsequent Plan Bay Areas**. Indeed, as the table below shows, the average annual compound population 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 consecutive 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 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

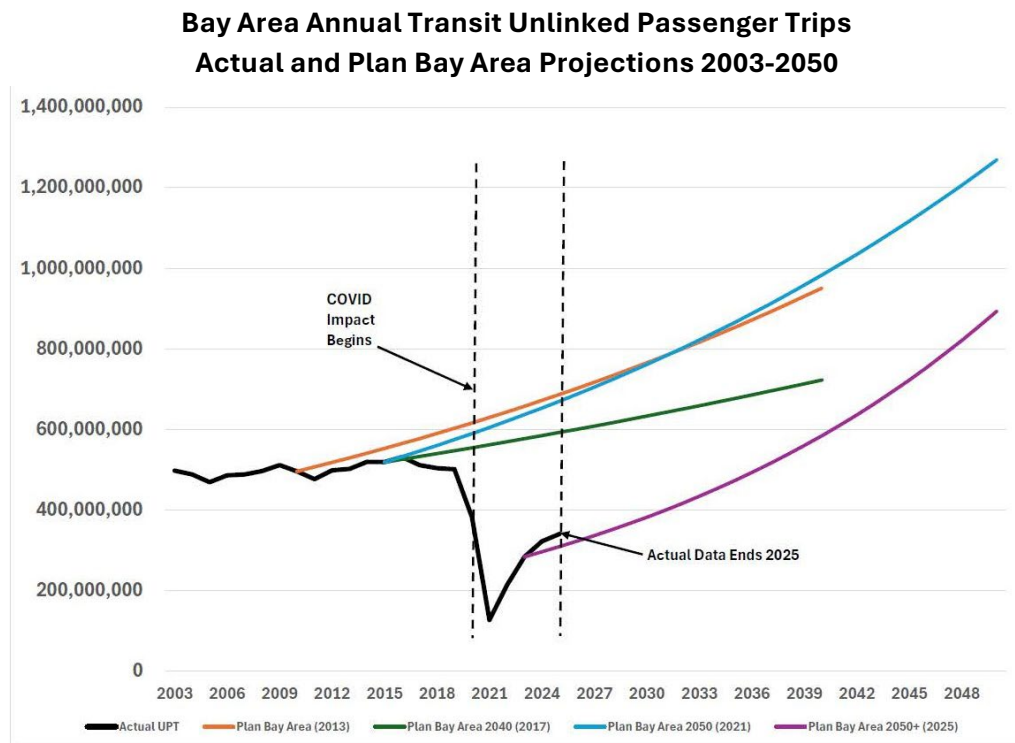
“actual” data is the “unlinked passenger trips” (hereinafter, “UPT”) time series from the U.S. Department of Transportation/Federal Transit Administration National Transit Database, “Complete Monthly Ridership (with adjustments and estimates),” [NTD Data | FTA.](#)

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-Marín 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.



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 noticeable 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 struggling 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<sup>7</sup>.” 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.

<sup>7</sup> 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**

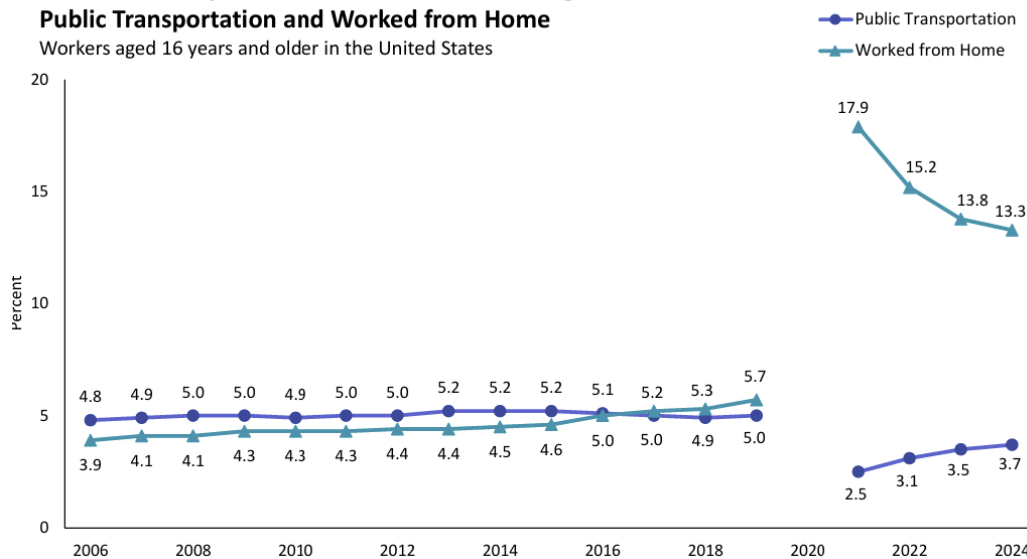
#### **Impacts of COVID on Remote Work and Other Factors Impacting Transit Utilization**

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<sup>8</sup>:

### Means of Transportation to Work as a Percentage of Workers: Public Transportation and Worked from Home

Workers aged 16 years and older in the United States



(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%<sup>9</sup> 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 tripled 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 interruptions 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 reduced and various transit influences such as security, safety, and cleanliness concerns, it appears that some former transit 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 “how 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.

<sup>8</sup> [Key Indicators Data 08192025.xlsx](#)

<sup>9</sup> 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

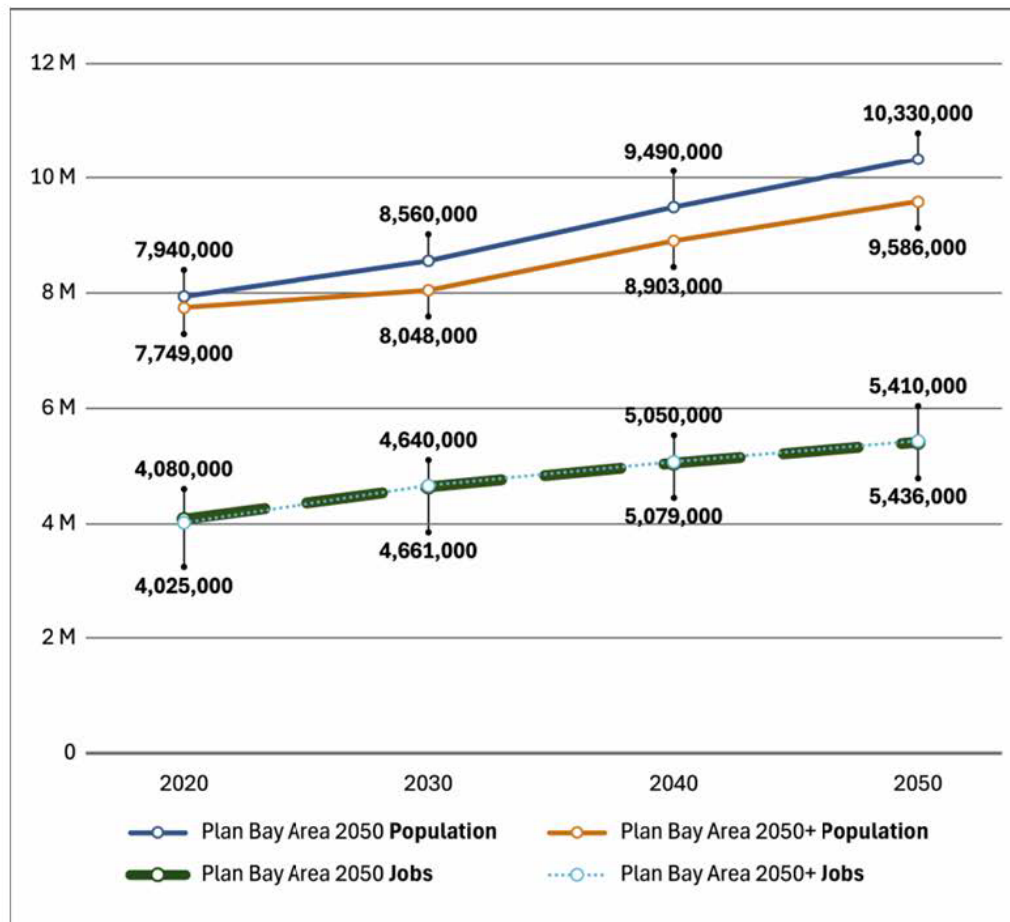
As a minor update, Plan Bay Area 2050+ uses 2023 as the base year, reassessing key assumptions to better reflect post-COVID travel patterns. This includes updated assumptions regarding work from home trends and changes in transit mode preferences observed after the pandemic. The regional travel model 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+<br>POPULATION AND JOBS PROJECTIONS |           |           |           |            |
|-------------------------------------------------------------------------------|-----------|-----------|-----------|------------|
|                                                                               | 2020      | 2030      | 2040      | 2050       |
| <i>Plan Bay Area 2050</i>                                                     |           |           |           |            |
| 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     |
| <i>Plan Bay Area 2050+</i>                                                    |           |           |           |            |
| 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+<br>POPULATION AND JOBS PROJECTIONS |        |        |        |        |
|-------------------------------------------------------------------------------|--------|--------|--------|--------|
|                                                                               | 2020   | 2030   | 2040   | 2050   |
| <i>Plan Bay Area 2050</i>                                                     |        |        |        |        |
| Jobs: Population                                                              | .51942 | .57915 | .57048 | .55154 |
| <i>Jobs:Population Ratio PBA2050+/Jobs:Population Ratio PBA2050</i>           |        |        |        |        |
|                                                                               | 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 equivalents” (hereinafter “FTE”), which is based on a nominal 2,080<sup>10</sup> annual hours of pay for time worked plus paid time off (vacation/holiday/illness plus other provisions, such as workers’ compensation)<sup>11</sup>.

<sup>10</sup> 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.

<sup>11</sup> 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 consistent from PBA2050 to PBA2050+, then the major change above means that these tables should be clearly labeled 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. If 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 achieving 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 optimistic.

#### **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 “TVSQVRRRA”). TVSQVRRRA is a joint powers agreement 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:

- TVSQVRRRA, *Final Valley Link Project Feasibility Report*, October 2019, for a line from Pleasanton BART to North Lathrop<sup>12</sup> 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<sup>13</sup> daily ridership of 11,101 (slide 15) for operations beginning in the fourth quarter of 2028 to North Lathram

- TVSQVRRRA, 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.
- TVSQVRRRA, 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 TVSQVRRRA 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
- TVSQVRRRA, 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<sup>14</sup>.

Obviously, much has changed since the original project concept. The most recent incarnation is approximately 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 Lathrup.

<sup>12</sup> Distance from the Pleasanton BART station to various terminus stations are approximately 22 miles to Mountain House, 37 miles to North Lathrup, and 47 miles to Stockton. Distances may vary depending on the precise alignment.

<sup>13</sup> 2025 appears to be in error, conflicts with 2028 operating date in next slide.

<sup>14</sup> 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<br>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 <sup>15</sup>                                                     | 45,266,667      |
| Total Annualized Cost                                                                   | 229,628,195     |
| 2045 Projected Daily Ridership                                                          | 9,964           |
| Daily:Annual Factor, ACE 2019 National Transit Database “profile” <sup>16</sup>         | 250             |
| Estimated 2045 Annual Ridership                                                         | 2,491,000       |
| 2045 Cost Per Passenger                                                                 | \$92.18         |

<sup>15</sup> 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.

<sup>16</sup> 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 Alameda 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 they 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<sup>17</sup>. 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.

<sup>17</sup> 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<sup>18</sup> 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 identified. 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 constrained project.

<sup>18</sup> 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<sup>19</sup>:

| Phasing Alternatives                        |                    | D/P to Mountain House<br>(10 vehicles) | D/P to Vasco<br>Direct ACE Connection<br>(6 vehicles) | D/P to Southfront<br>Bus ACE Connection<br>(5 vehicles) |
|---------------------------------------------|--------------------|----------------------------------------|-------------------------------------------------------|---------------------------------------------------------|
| <b>Total Project Cost</b><br>(\$M, YOE)     |                    | \$3,794 - \$4,465                      | \$2,025 - \$2,186                                     | \$2,161 - \$2,305                                       |
| <b>FTA Share</b>                            | <b>40%</b>         | \$1,518 - \$1,786                      | \$810 - \$875                                         | \$928 - \$990                                           |
|                                             | <b>49.4%</b>       | \$1,874 - \$2,206                      | \$1,000 - \$1,080                                     | \$1,068 - \$1,139                                       |
| <b>Existing Local Funding Match</b>         |                    | \$635                                  | \$635                                                 | \$635                                                   |
| <b>Additional Funding Need</b>              | <b>FTA @ 40%</b>   | \$1,641 - \$2,044                      | \$580 - \$677                                         | \$598 - \$680                                           |
|                                             | <b>FTA @ 49.4%</b> | \$1,285 - \$1,624                      | \$390 - \$471                                         | \$459 - \$531                                           |
| <b>Ridership</b><br>(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.

<sup>19</sup> [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 TVSJVRRRA and the other Valley Link proponents have also determined to not give more than minimal, token consideration of what may be very competitive alternatives, particularly long-haul commuter express bus service<sup>20</sup> 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*<sup>21</sup>, 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 eliminated 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 infrastructure community, led by MTC, for the costs, revenue sources, timing, and productivity of the proposed projects are simply not creditable.

<sup>21</sup> [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 TVSJVRRRA’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<sup>22</sup>:

"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.

<sup>22</sup> Page 5, Accessed May 2, 2013: [http://www.alamedactc.org/files/managed/Document/7697/1986\\_MeasureB\\_Expenditure\\_Plan.pdf](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<sup>23</sup>. 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<sup>24</sup>, 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<sup>25</sup>. 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.

<sup>23</sup> OPAC Consulting Engineers, "BART Dublin/Pleasanton Extension," accessed May 2, 2013: <http://www.opacengineers.com/projects/BARTDPX>

<sup>24</sup> 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>

<sup>25</sup> 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](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<sup>26</sup>. 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<sup>27</sup>, 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<sup>28</sup>, 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<sup>29</sup> – 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.

<sup>26</sup> Accessed May 2, 2013: [http://www.alamedactc.org/files/managed/Document/8472/2000\\_Measure\\_B\\_Ballot\\_and\\_Plan.pdf](http://www.alamedactc.org/files/managed/Document/8472/2000_Measure_B_Ballot_and_Plan.pdf)

<sup>27</sup> Accessed May 2, 2013: [http://www.alamedactc.org/files/managed/Document/4654/ACTIA6020\\_BARTWarmSpringsExtension\\_factsheet.pdf](http://www.alamedactc.org/files/managed/Document/4654/ACTIA6020_BARTWarmSpringsExtension_factsheet.pdf)

<sup>28</sup> Accessed May 2, 2013: [http://www.alamedactc.org/files/managed/Document/4642/ACTIA6030\\_BARTOaklandAirportConnector\\_factsheet.pdf](http://www.alamedactc.org/files/managed/Document/4642/ACTIA6030_BARTOaklandAirportConnector_factsheet.pdf)

<sup>29</sup> 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<sup>30</sup>. 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)<sup>31</sup>.

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<sup>32</sup>**

|                                    | 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<br>(1986 \$)           | \$120.7<br>(1990 \$) | \$170.2<br>(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.<sup>33</sup>

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.”<sup>34</sup> 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.<sup>35</sup>

<sup>30</sup> San Francisco Bay Area Rapid Transit District, April 15, 1993, “BART Chronology,” accessed November 8, 2010: <http://www.bart.gov/docs/BARThistory.pdf>

<sup>31</sup> DOT/FTA, Contractor Performance Assessment Report – 2007, page 69 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](http://fta.dot.gov/publications/publications_9204.html), accessed November 3, 2010).

<sup>32</sup> DOT/FTA, Contractor Performance Assessment Report – 2007, page 72 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](http://fta.dot.gov/publications/publications_9204.html), accessed November 3, 2010).

<sup>33</sup> DOT/FTA, Contractor Performance Assessment Report – 2007, page 73 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](http://fta.dot.gov/publications/publications_9204.html), accessed November 3, 2010).

<sup>34</sup> DOT/FTA, Contractor Performance Assessment Report – 2007, page 72 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](http://fta.dot.gov/publications/publications_9204.html), accessed November 3, 2010).

<sup>35</sup> DOT/FTA, Contractor Performance Assessment Report – 2007, page 73 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](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.<sup>36</sup> 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.<sup>37</sup>

Within two years expected YOE cost was \$1.51 billion and delays were expected.<sup>38</sup> 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.<sup>39</sup> 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.<sup>40</sup>



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.<sup>41</sup> Looking at more ridership, BART reported 35,534, 52% of the projection for 2010, in 2012.<sup>42</sup>

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<sup>43</sup> -- 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.<sup>44</sup> This prediction came in about 1,500 average daily boardings over the actual numbers;<sup>45</sup> 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.<sup>46</sup> 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.<sup>47</sup> 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 by 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<sup>48</sup>.

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<sup>49</sup>.

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<sup>50</sup>.

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<sup>51</sup>. 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<sup>52</sup> 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<sup>53</sup>.

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.

<sup>36</sup> DOT/FTA, *The Predicted and Actual Impacts of New Starts Projects – 2007*, page 131.

<sup>37</sup> *Ibid*, page 132, 3.

<sup>38</sup> *Ibid.*, page 132.

<sup>39</sup> *Ibid.*, page 135.

<sup>40</sup> *Ibid*, page 135.

<sup>41</sup> *Ibid.*, page 134.

<sup>42</sup> 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](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)

<sup>43</sup> BART, 2024 Ridership by Station

<sup>44</sup> DOT/FTA, *Contractor Performance Assessment Report – 2007*, page 72 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](http://fta.dot.gov/publications/publications_9204.html), accessed November 3, 2010).

<sup>45</sup> DOT/FTA, *Contractor Performance Assessment Report – 2007*, page 72 (available at: [http://fta.dot.gov/publications/publications\\_9204.html](http://fta.dot.gov/publications/publications_9204.html), accessed November 3, 2010).

<sup>46</sup> <http://www.bart.gov/docs/WeekdayExits.pdf>

<sup>47</sup> Bay Area Rapid Transit, BART Fiscal Year Weekday Average Exits (for 2012).

<sup>48</sup> MTC Resolution 1876, "Regional Rail Agreements," March 24, 1988.

<sup>49</sup> <http://www.bart.gov/docs/WeekdayExits.pdf>

<sup>50</sup> National Transit Database, "Profiles" for Caltrain for years cited, accessed November 8, 2010: <http://www.ntdprogram.gov/ntdprogram/data.htm>

<sup>51</sup> Metropolitan Transportation Commission, "Baby Bullet Trains Debut," June 2004, accessed November 8, 2010: [http://www.mtc.ca.gov/news/info/baby\\_bullet.htm](http://www.mtc.ca.gov/news/info/baby_bullet.htm)

<sup>52</sup> 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](http://articles.sfgate.com/2005-08-12/bay-area/17384394_1_samtrans-bart-directors-blue-line)

<sup>53</sup> Edward Carpenter, "SamTrans Struggles with Fiscal Woes," San Francisco Examiner, July 27, 2006, accessed November 8, 2010: [http://www.sfxaminer.com/local/samtrans\\_struggles\\_with\\_fiscal\\_woes2006-07-27T09\\_00\\_00.html](http://www.sfxaminer.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-Marín 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 rail<sup>54</sup>," 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.<sup>55</sup> 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 thorough 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 Rafael–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 million58.

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.

<sup>54</sup> 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](http://www.ntdprogram.gov/ntdprogram/pubs/ARM/2012/html/2012_Reporting_Manual_Table_of_Contents.html)

<sup>55</sup> 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-track 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/](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."

<sup>56</sup> SMART, Smart Project Funding Plan, July 2008, pp. 5, 8, 9, and 22: <http://www2.sonomamarintrain.org/userfiles/file/Funding%20Plan%20-%202007-15-08%20Final%20Version.pdf>

<sup>57</sup> SMART, "SMART's Financial Plan:" [http://www2.sonomamarintrain.org/userfiles/file/18\\_whitepaper\\_financial.pdf](http://www2.sonomamarintrain.org/userfiles/file/18_whitepaper_financial.pdf)

<sup>58</sup> SMART, "Overview:" [http://www2.sonomamarintrain.org/userfiles/file/18\\_whitepaper\\_financial.pdf](http://www2.sonomamarintrain.org/userfiles/file/18_whitepaper_financial.pdf)

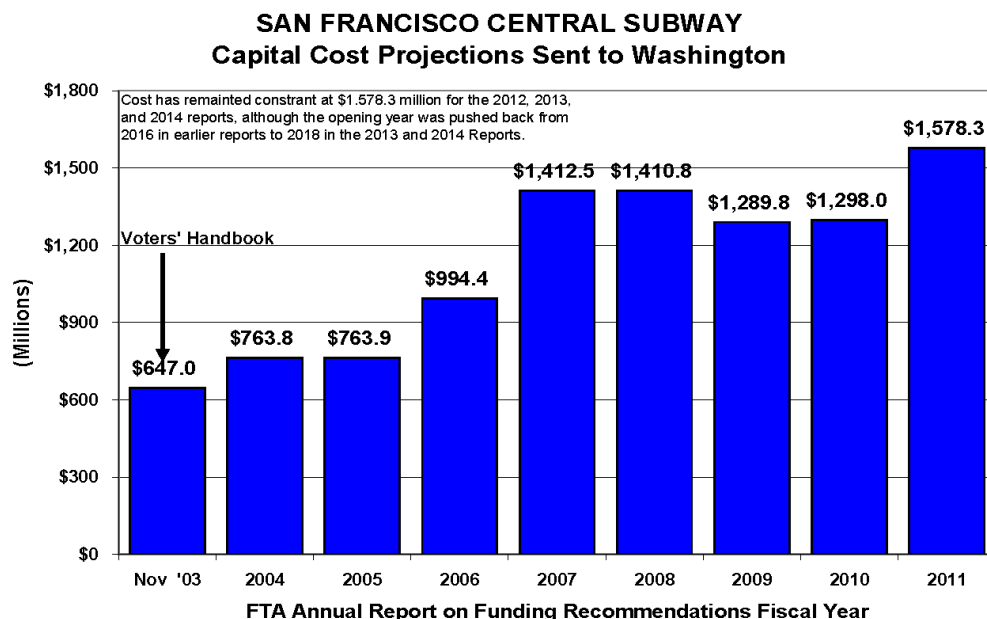
## Response I28-24

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.

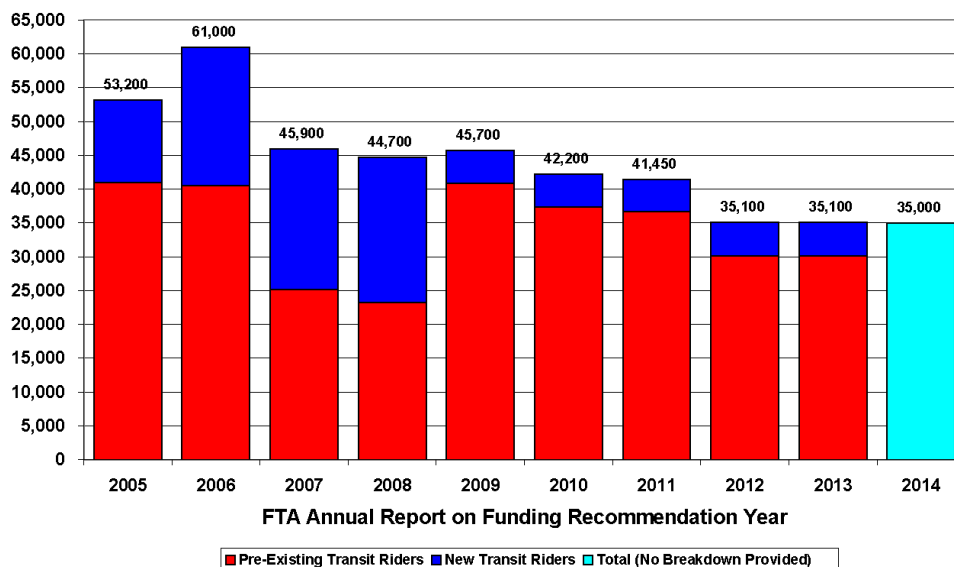


All data in this section, unless otherwise specified, is from the U.S. DOT/FTA series, *Annual Report on New Starts*<sup>59</sup>. As can be seen above, the projected capital cost – for this 1.7-mile, three station project, including procurement of four vehicles, and without any costs for maintenance 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<sup>60</sup>.

### SAN FRANCISCO CENTRAL SUBWAY Ridership Projections Sent to Washington

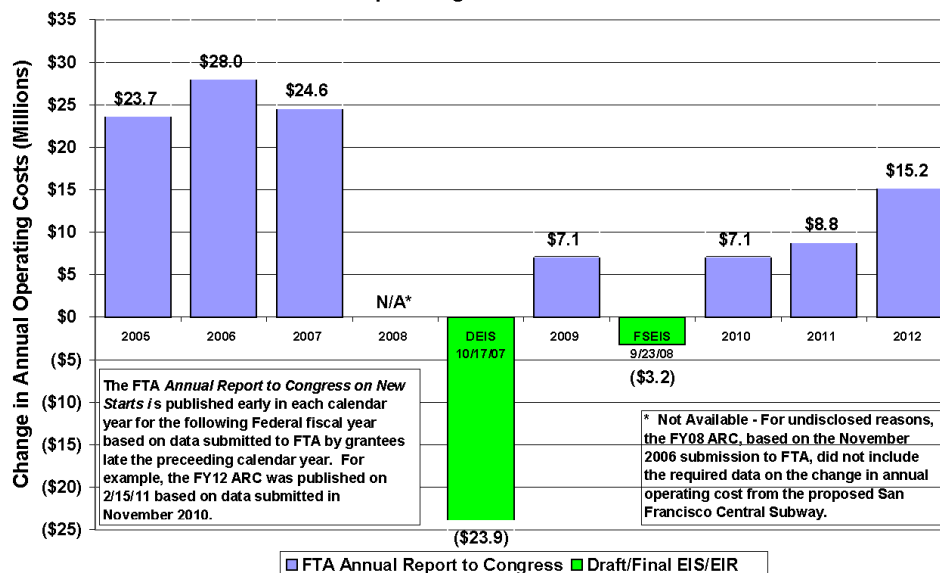


We have also seen an interesting progression of projected ridership over time, with the latest projection, 35,000 daily riders, at 57% of the 61,000 that was promulgated in 2006, when the project was far from approved.

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.

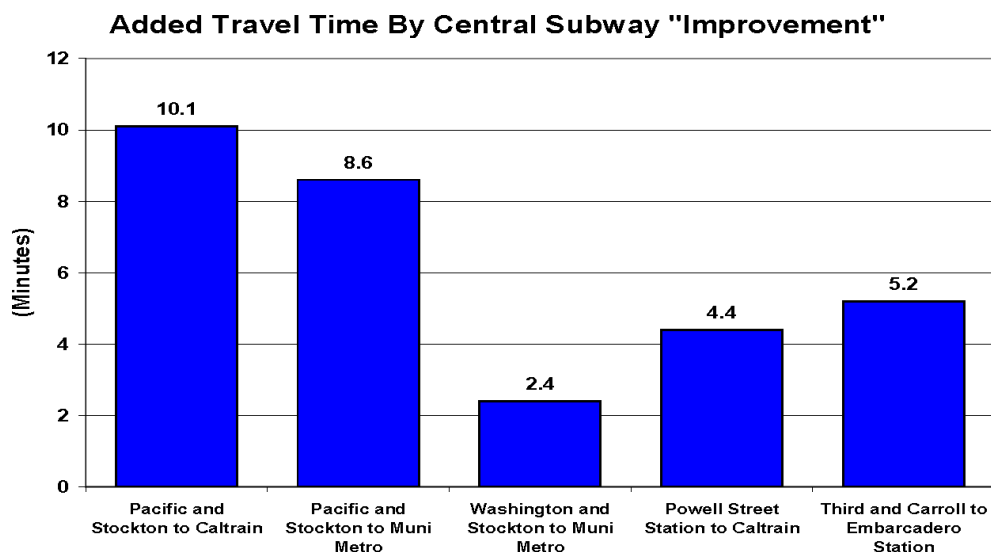
When the Central Subway finally opened in 2023, ridership was only 15,000 – although, to be fair, at that time, the entire transit industry was only about one to two years into recovery from the worst of the COVID downturn. However, by early 2025, it had only reached about 22,000 daily<sup>61</sup>.

### SAN FRANCISCO CENTRAL SUBWAY Annual Operating Cost Effect on Muni



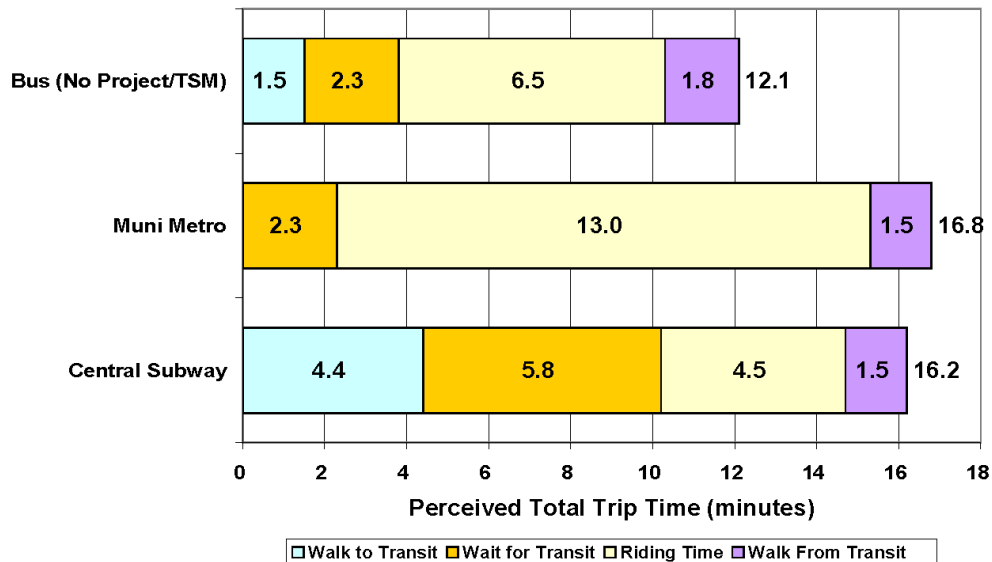
The projected financial impact on MUNI operations has also varied widely from year to year and from presentation to presentation.

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.

### From Powell Street Station to CalTrain



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<sup>62</sup>.

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.

<sup>59</sup> *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](http://www.fta.dot.gov/12304_2618.html)

<sup>60</sup> 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?](#)

<sup>61</sup> *Ibid.*

<sup>62</sup> 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 serious, 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 Mayor 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 every 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*<sup>63</sup>.

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).

<sup>63</sup> 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 properly 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<sup>64</sup>, 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.

<sup>64</sup> 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 become 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<sup>65</sup>” 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<sup>66</sup> 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.

<sup>65</sup> 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.

<sup>66</sup> 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<sup>67</sup> 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.

<sup>67</sup> 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<sup>68</sup> (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<sup>69</sup> 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.

<sup>68</sup> 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.

<sup>69</sup> 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 flawed 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 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.**

**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](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 in 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."*<sup>1</sup>

<sup>1</sup> <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...”*<sup>2</sup>

<sup>2</sup> <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.<sup>3</sup>

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."<sup>4</sup> 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?*

<sup>3</sup> <https://www.asce.org/publications-and-news/civil-engineering-source/society-news/article/2025/12/03/asce-california-section-releases-infrastructure-report-card>

<sup>4</sup> 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 Response 7: 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 entrenched 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.<sup>5</sup>*

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).”<sup>6</sup> [underline added].*

<sup>6</sup> 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.<sup>7</sup> 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 CO<sub>2</sub> 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.”*

<sup>7</sup> **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<sup>8</sup>, 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.

<sup>8</sup> 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<sup>9</sup> 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?*

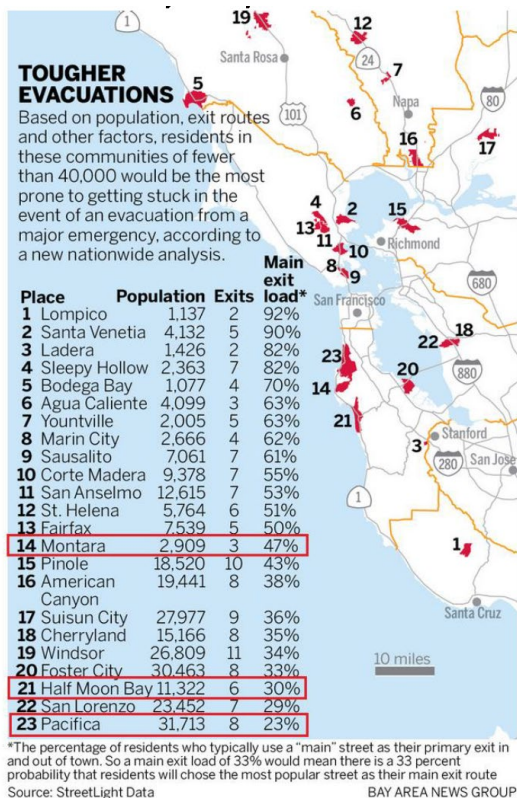
<sup>9</sup> DEIR section 3.14-12**Response I29-35**

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.



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.<sup>10</sup>

<sup>10</sup> 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.<sup>11</sup> Since the State will not do this, it is imperative that our regional governance create and advocate for housing strategy that makes economic sense.

<sup>11</sup> "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.”<sup>12</sup>*

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.

<sup>12</sup> 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<sup>13</sup>. Bay Area Transit systems tie up 16 time more funds per passenger mile than an EV<sup>14</sup>; 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<sup>15</sup>. 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.

<sup>13</sup> 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>

<sup>14</sup> Ibid

<sup>15</sup> 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<sup>16</sup>, 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.

<sup>16</sup> 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.<sup>17</sup> Further, more agile road-based transit can be scaled up or down, unlike fixed rail systems.

<sup>17</sup> <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.<sup>18</sup>

<sup>18</sup> 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.<sup>19</sup>

<sup>19</sup> 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 CO<sub>2</sub> 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 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, 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 for 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.)<sup>20</sup>

<sup>20</sup> 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](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](mailto: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](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.<sup>21</sup>

<sup>21</sup> 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 Coastsides 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](https://dof.ca.gov/media/docs/forecasting/Demographics/projections/P1A_State_Total.xlsx). 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](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*

<sup>1</sup> <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..."*<sup>2</sup>

<sup>2</sup> <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.<sup>3</sup>

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.”<sup>4</sup> 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?*

<sup>3</sup> <https://www.asce.org/publications-and-news/civil-engineering-source/society-news/article/2025/12/03/asce-california-section-releases-infrastructure-report-card>

<sup>4</sup> 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 entrenched 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.<sup>5</sup>*

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)."*<sup>6</sup> [underline added].

<sup>6</sup> 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.<sup>7</sup> 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."*

<sup>7</sup> **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<sup>8</sup>, 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.

<sup>8</sup> 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<sup>9</sup> 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.

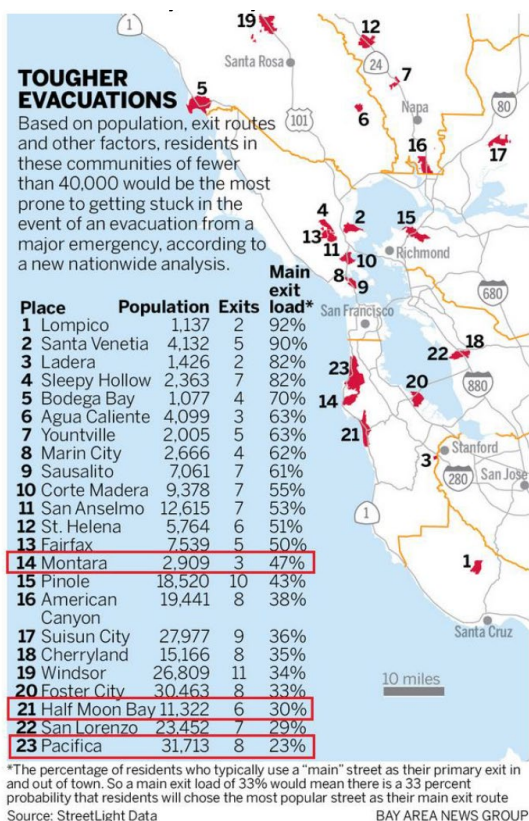
*12) Question: Will the Plan be upgraded to reflect and fund mitigation of the water supplies required to support the projected population?*

<sup>9</sup> 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.





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.<sup>10</sup>

<sup>10</sup> 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.<sup>11</sup> Since the State will not do this, it is imperative that our regional governance create and advocate for housing strategy that makes economic sense.

<sup>11</sup> “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.”<sup>12</sup>*

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.

<sup>12</sup> 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<sup>13</sup>. Bay Area Transit systems tie up 16 time more funds per passenger mile than an EV<sup>14</sup>; 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<sup>15</sup>. 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.

<sup>13</sup> 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>

<sup>14</sup> Ibid

<sup>15</sup> 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<sup>16</sup>, 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.

<sup>16</sup> 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.<sup>17</sup> Further, more agile road-based transit can be scaled up or down, unlike fixed rail systems.

<sup>17</sup> <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.<sup>18</sup>

<sup>18</sup> 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.<sup>19</sup>

<sup>19</sup> 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 CO<sub>2</sub> 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.)<sup>20</sup>

<sup>20</sup> 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](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 [aircomments@bayareametro.gov](mailto:aircomments@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](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.<sup>21</sup>

<sup>21</sup> 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 Coastsides 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**

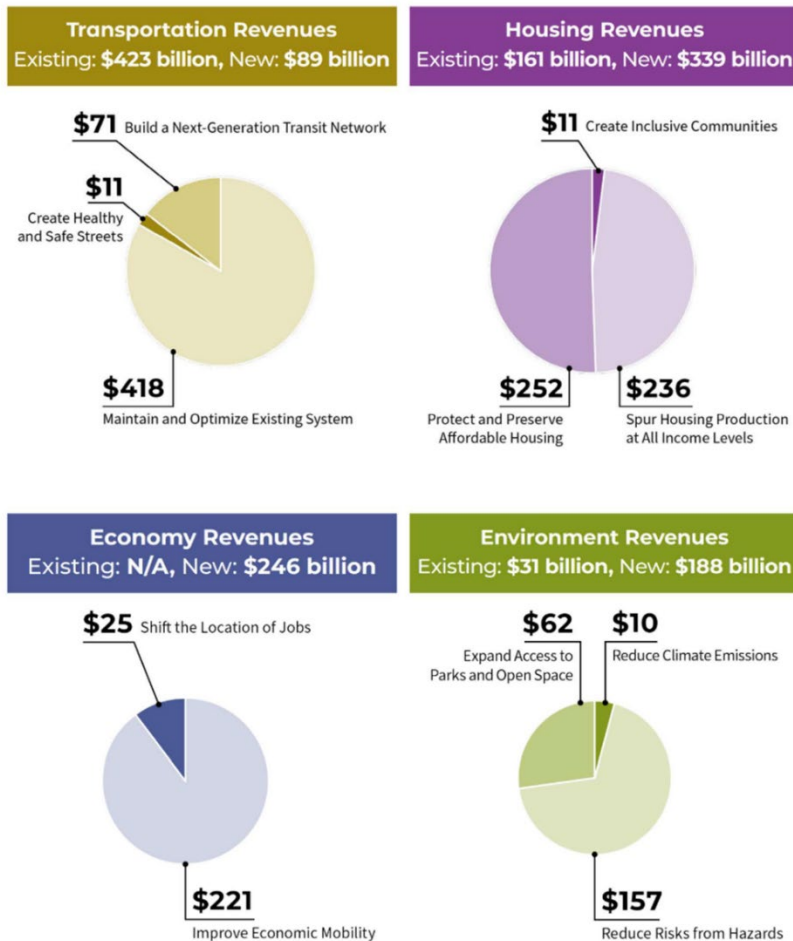
What is project 2050+ plus what are their plans, and how effective will it be? Is it truly the saving grace which they like to mention?

**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**

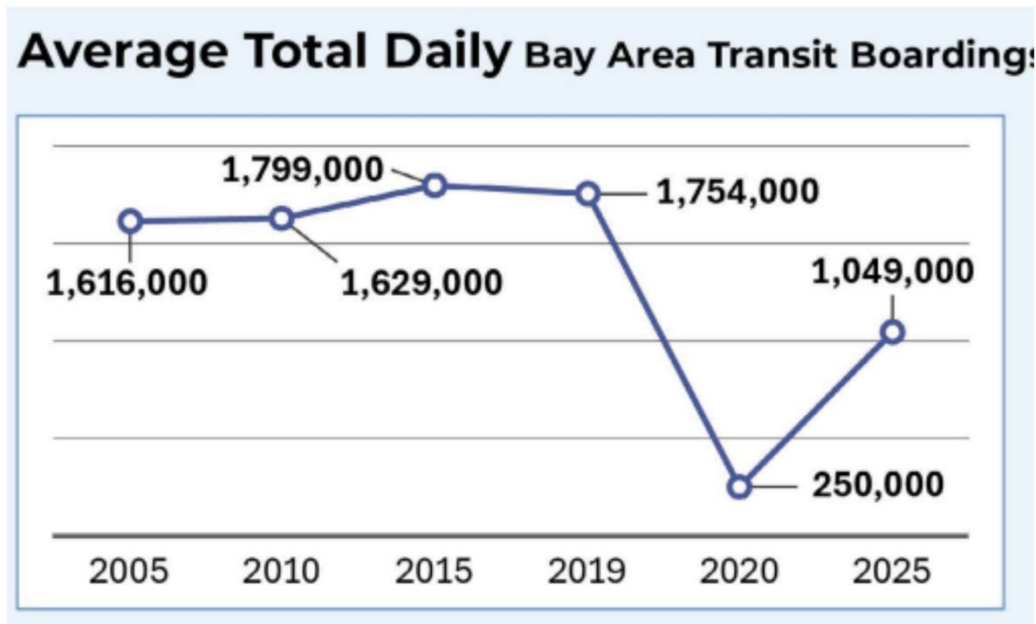
The commenter raises concerns regarding transportation costs, transit operating shortfalls, and the role of future transportation revenue measures. The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response 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<sub>2</sub> 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**

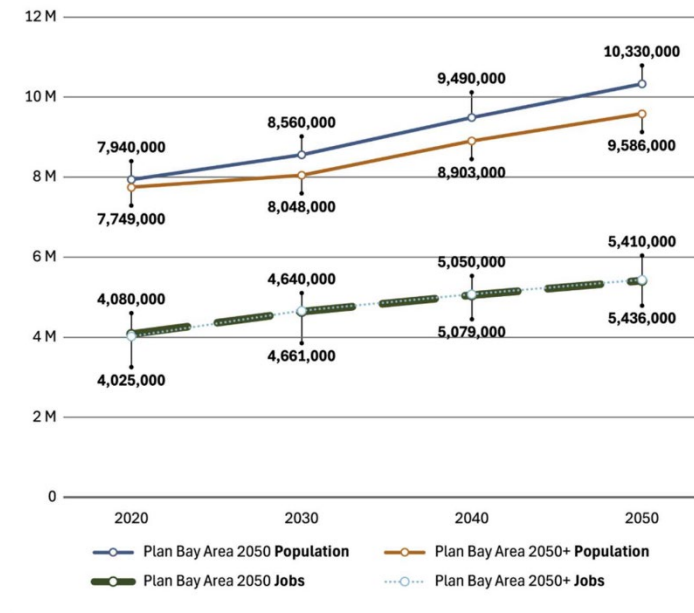
**The comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the Draft EIR. Please refer to Response I32-2 and Response I32-6. Comment I32-11 Affordable Housing**

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 with 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 affordable 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 to 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 to 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 idly 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 basins 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 7<sup>th</sup> 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:

$$1.84 \text{ million (PBA 2050+)} - 0.49 \text{ million (DOF/DRU)} \approx 3.75 \frac{1.84 \text{ million (PBA 2050+)}}{0.49 \text{ million (DOF/DRU)}} \approx 3.75$$

**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 high-income 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” measures** 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 standards** (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:

*Curtailling 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, 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 waste 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 be 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 filtration** 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 include mitigation measures. Evacuation impacts are included in 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 “Master 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 no 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.,  $\pm 5\text{--}10\%$ ) 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 6<sup>th</sup> Cycle RHNA, and the Plan Bay Area 2050+ regional growth forecast has no influence on 6<sup>th</sup> 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 exists 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 exists 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 and 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 lot 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<sub>2.5</sub> and PM<sub>10</sub>) (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<sub>2.5</sub> emissions from baseline and a 26% increase in PM<sub>10</sub> 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<sub>2.5</sub> emissions, and 8% increase in PM<sub>10</sub> 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 rescission 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<sub>x</sub> 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<sub>2</sub>e] as compared to 52,000 MTCO<sub>2</sub>e as disclosed in the Draft EIR). This would result in a change from 2023 to 2050 emissions of -1,700 MTCO<sub>2</sub>e (3 % decrease in emissions) as compared to -6,600 MTCO<sub>2</sub>e (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<sub>2e</sub> 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 recession remains. MTC further anticipates that CARB will recommend off-model adjustments to EMFAC2021 to account for a scenario in which the recession 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<sub>x</sub> rule and EIR mobile source emissions thus do not account for the June 12, 2025, disapproval of the Low NO<sub>x</sub> 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<sub>x</sub> (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<sub>x</sub> 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 <sub>x</sub> (Summertime) | 36.3           | 16.0                | -20.3                          | -56%                         |
| NO <sub>x</sub> (Wintertime) | 42.3           | 19.1                | -23.2                          | -55%                         |
| PM <sub>2.5</sub>            | 3.8            | 4.7                 | 0.9                            | 23%                          |
| PM <sub>10</sub>             | 18.7           | 24.7                | 6.0                            | 32%                          |

Notes: EMFAC = Emission Factor model; ROG = reactive organic gasses; NO<sub>x</sub> = oxides of nitrogen; PM<sub>2.5</sub> = 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<sub>x</sub> emissions by 56% (20.3 tons per day), and wintertime NO<sub>x</sub> 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 <sub>x</sub> (summertime)   | 36.4           | 27.1                | -9.3                           | -26%                         |
| NO <sub>x</sub> (wintertime)   | 41.8           | 30.2                | -11.6                          | -28%                         |
| PM <sub>2.5</sub> (wintertime) | 3.8            | 4.8                 | 1.0                            | 27%                          |
| PM <sub>10</sub> (wintertime)  | 18.7           | 25.0                | 6.3                            | 34%                          |

Notes: EMFAC = Emission Factor model; ROG = reactive organic gasses; NO<sub>x</sub> = oxides of nitrogen; PM<sub>2.5</sub> = 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<sub>x</sub> 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<sub>x</sub>.

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<sub>x</sub> emissions by 26% (9.3 tons per day), and wintertime NO<sub>x</sub> 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 <sub>x</sub> (summertime)   | 36.9           | 34.5                | -2.5                           | -7%                          |
| NO <sub>x</sub> (wintertime)   | 41.2           | 37.8                | -3.5                           | -8%                          |
| PM <sub>2.5</sub> (wintertime) | 5.8            | 7.1                 | 1.3                            | 22%                          |
| PM <sub>10</sub> (wintertime)  | 22.9           | 28.9                | 6.0                            | 26%                          |

Notes: EMFAC = Emission Factor model; ROG = reactive organic gasses; NO<sub>x</sub> = oxides of nitrogen; PM<sub>2.5</sub> = 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<sub>x</sub> 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<sub>x</sub>.

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<sub>x</sub> emissions by 7% (2.5 tons per day), and wintertime NO<sub>x</sub> 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<sub>2.5</sub> emissions would increase by 22% (1.3 tons per day), and PM<sub>10</sub> 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<sub>10</sub> 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<sub>10</sub> 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.

...

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 NO<sub>x</sub> 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<sub>x</sub> emissions by 7% (2.5 tons per day), and wintertime NO<sub>x</sub> 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<sub>2.5</sub> emissions would increase by 23% (0.9 tons per day), and PM<sub>10</sub> 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<sub>2.5</sub> and PM<sub>10</sub> 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<sub>2.5</sub> emissions would increase by 27% (1 ton per day), and PM<sub>10</sub> emissions would increase 34% (6.3 tons per day) during the proposed plan's timeframe compared to existing conditions. Both PM<sub>2.5</sub> and PM<sub>10</sub> 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<sub>2.5</sub> exhaust, and total PM<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> exhaust, and total PM<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> exhaust, and total PM<sub>2.5</sub> 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 PM<sub>2.5</sub> 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<sub>2.5</sub> exhaust, and total PM<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> 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<sub>2.5</sub> emissions would increase in the plan area as would total PM<sub>2.5</sub> 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<sub>2.5</sub> emissions would increase in the plan area as would total PM<sub>2.5</sub> 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 Draft 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 rescission. 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 rescission remains. MTC anticipates that CARB will recommend off-model adjustments to EMFAC2021 to account for a scenario in which the rescission 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 rescission. 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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 EMFAC2017 estimates.

**Table 3.6-9: Daily Levels of Gasoline and Diesel Consumption<sup>1</sup> (EMFAC2017)**

| Vehicle Category   | 2023 Gasoline (thousands gal/day) <sup>2</sup> | 2023 Diesel (thousands gal/day) <sup>2</sup> | 2023 Natural Gas (thousands gal/day) <sup>2</sup> | 2050 Gasoline (thousands gal/day) <sup>2</sup> | 2050 Diesel (thousands gal/day) <sup>2</sup> | 2050 Natural Gas (thousands gal/day) <sup>2</sup> | Net Change gasoline (thousands gal/day) <sup>2</sup> | Net Change Diesel (thousands gal/day) <sup>2</sup> | Net Change Natural Gas (thousands gal/day) <sup>2</sup> |
|--------------------|------------------------------------------------|----------------------------------------------|---------------------------------------------------|------------------------------------------------|----------------------------------------------|---------------------------------------------------|------------------------------------------------------|----------------------------------------------------|---------------------------------------------------------|
| 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) <sup>2</sup> | 2023 Diesel (thousands gal/day) <sup>2</sup> | 2023 Natural Gas (thousands gal/day) <sup>2</sup> | 2050 Gasoline (thousands gal/day) <sup>2</sup> | 2050 Diesel (thousands gal/day) <sup>2</sup> | 2050 Natural Gas (thousands gal/day) <sup>2</sup> | Net Change gasoline (thousands gal/day) <sup>2</sup> | Net Change Diesel 9 (thousands gal/day) <sup>2</sup> | Net Change Natural Gas (thousands gal/day) <sup>2</sup> |
|-------------------|------------------------------------------------|----------------------------------------------|---------------------------------------------------|------------------------------------------------|----------------------------------------------|---------------------------------------------------|------------------------------------------------------|------------------------------------------------------|---------------------------------------------------------|
| Other Vehicles    | 40                                             | 3                                            | -                                                 | 40                                             | 3                                            | -                                                 | 2                                                    | 0                                                    | -                                                       |
| All Vehicle Types | 4,900                                          | 1,100                                        | -                                                 | 4,300                                          | 1,100                                        | -                                                 | -630                                                 | 50                                                   | 0                                                       |
| <b>Total Fuel</b> |                                                | <b>6,000</b>                                 |                                                   |                                                | <b>5,400</b>                                 |                                                   |                                                      | <b>-580</b>                                          |                                                         |

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; compiled 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<sub>2</sub>e) (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%                      |
| <b>Total</b>   | <b>58,600</b> | <b>52,000</b>      | <b>-6,600</b>    | <b>-11%</b>              |

Notes: MTCO<sub>2</sub>e = 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<sub>2</sub> estimates for conversion to CO<sub>2</sub>e. 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; compiled by Ascent in 2025.

**Table 3.6-11: Existing and Forecasted Daily Transportation GHG Emissions by Vehicle Source (MTCO<sub>2</sub>e) (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%                       |
| <b>Total</b>       | <b>53,200</b> | <b>48,300</b>      | <b>-4,900</b>    | <b>-9%</b>               |

Notes: MTCO<sub>2</sub>e = 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 CO<sub>2</sub> estimates for conversion to CO<sub>2</sub>e. 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; compiled 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<sub>2</sub>e/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<sub>2</sub>e/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<sub>2</sub>e = 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; compiled 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<sub>2</sub>e, 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<sub>2</sub>e) (EMFAC2021 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%                      |
| <b>Total</b>       | <b>58,600</b> | <b>56,900</b>      | <b>-1,700</b>    | <b>-3%</b>               |

Notes: MTCO<sub>2</sub>e = 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<sub>2</sub> estimates for conversion to CO<sub>2</sub>e. 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<sub>2</sub>e/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<sub>2</sub>e/day) (EMFAC2021 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<sub>2</sub>e = 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<sub>2</sub>e/year) (EMFAC2017)**

|                | 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<sub>2</sub>e = 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<sub>2</sub>e (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<sub>2</sub>e/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<sub>2</sub>e (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 MTCO<sub>2</sub> 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 MTCO<sub>2</sub> 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 MTCO<sub>2</sub> Reductions**

**Table 3.6-15** shows the change in daily and per capita car and light-duty truck CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> Emissions Under SB 375<sup>1</sup>**

**Revised:**

**Table 3.6-11: Plan Bay Area 2050 Strategy EN8: Clean Vehicle Initiatives and Strategy EN9: Transportation Demand Management Initiatives MTCO<sub>2</sub> Reductions**

**Table 3.6-12** shows the change in daily and per capita car and light-duty truck CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> Emissions Under SB 375<sup>1</sup>**

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, ~~1.0~~ 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 Draft 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 Draft 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<sup>1</sup> portal provides GIS data that can be used by local governments for incorporation into subregional shoreline adaptation plans.

<sup>1</sup> <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<sup>1</sup> 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<sup>2</sup>, 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.

<sup>1</sup> <https://www.sfei.org/projects/baylands-resilience-framework>

<sup>2</sup> <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.

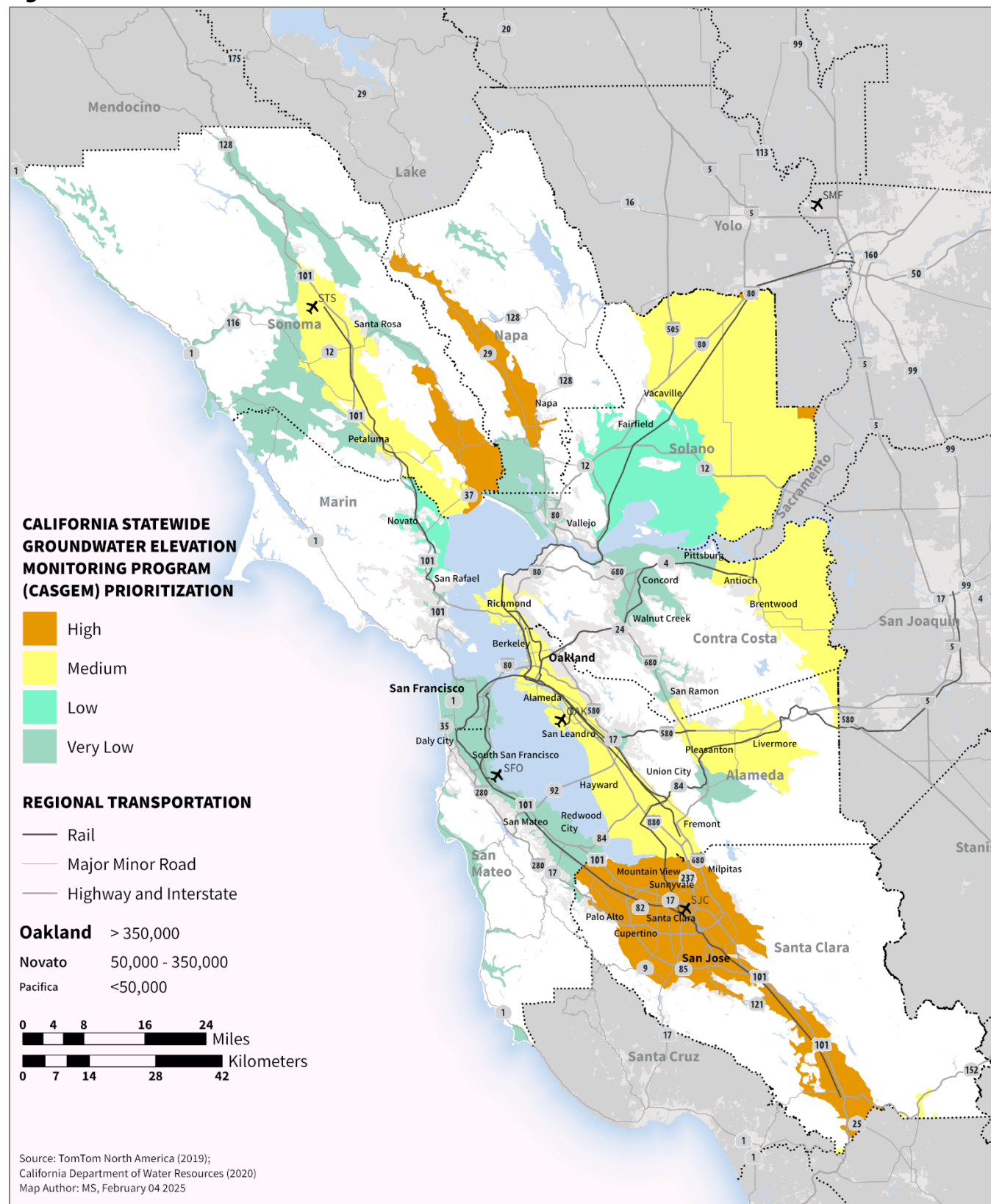
**Revised:**

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”**

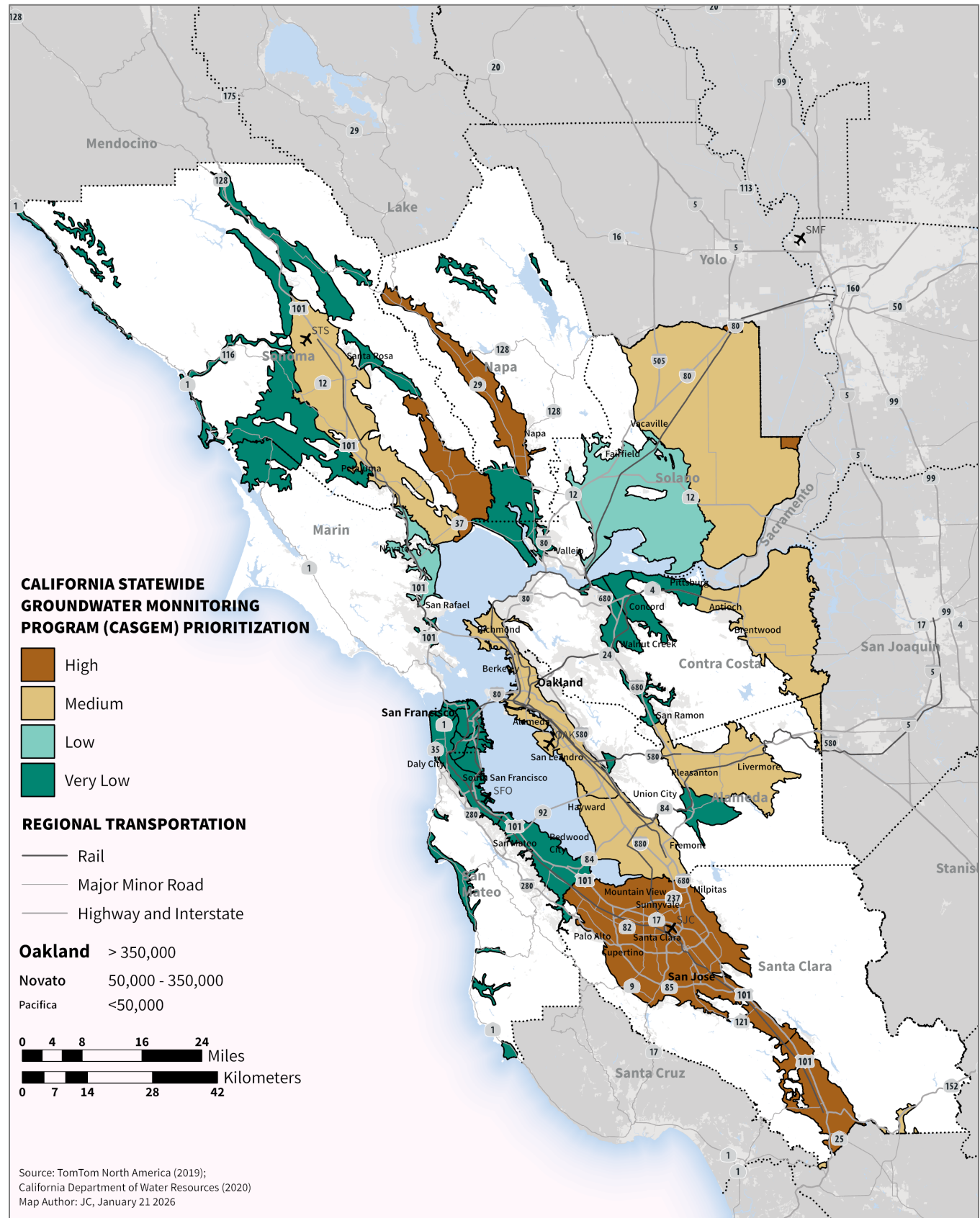
In response to Comment A7-5, the following revision has been made to Figure 3.10-4 on page 3.10-15 of the hydrology and water quality section of the Draft EIR:

Original:

**Figure 3.10-4: Groundwater Basin Prioritization**

Sources: Figure provided by MTC and ABAG, adopted by Ascent in 2025.

## Revised:



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 McAteer-Petris 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 Draft 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 Draft 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 filling 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 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."

**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 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 (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 (PM<sub>2.5</sub>), 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 <sub>x</sub> (summertime)   | 16.0          | 18.1                   | 15.9          | 16.0          |
| NO <sub>x</sub> (wintertime)   | 19.1          | 21.5                   | 19.0          | 19.1          |
| PM <sub>2.5</sub> (wintertime) | 4.7           | 5.1                    | 4.6           | 4.6           |
| PM <sub>10</sub> (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<sub>x</sub> = 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 <sub>x</sub> (summertime)   | 34.5          | 38.8                   | 34.3          | 34.4          |
| NO <sub>x</sub> (wintertime)   | 37.8          | 42.5                   | 37.6          | 37.7          |
| PM <sub>2.5</sub> (wintertime) | 7.1           | 7.9                    | 7.1           | 7.1           |
| PM <sub>10</sub> (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; NO<sub>x</sub> = 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 <sub>x</sub> (summertime)   | 27.1          | 30.5                   | 27.0          | 27.0          |
| NO <sub>x</sub> (wintertime)   | 30.2          | 33.9                   | 30.0          | 30.1          |
| PM <sub>2.5</sub> (wintertime) | 4.8           | 5.3                    | 4.8           | 4.8           |
| PM <sub>10</sub> (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<sub>x</sub> = 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<sub>2.5</sub> that both proposal plan and Alternative 1 would result in the same level of PM<sub>2.5</sub> 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 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 NO<sub>x</sub> and PM<sub>10</sub> than the proposed plan and would emit the same level of ROG and PM<sub>2.5</sub> 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<sub>2</sub>e) 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<sub>2</sub> 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<sub>2</sub>e) 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<sub>2</sub> 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<sub>2</sub> 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; compiled by Ascent in 2025.

**Table 4-23: SB 375 GHG Emissions Reductions Relative to 2005 Baseline for Each Alternative<sup>1</sup>**

|                                                     | 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.

<sup>1</sup> 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<sub>2</sub>e/day) compared to the proposed plan (56,200 MTCO<sub>2</sub>e/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<sub>2</sub> 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<sup>1</sup>**

|                                                     | 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.

<sup>1</sup> 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<sub>2</sub>e/day) compared to the proposed plan (61,500 MTCO<sub>2</sub>e/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<sub>2</sub> 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<sub>2</sub>e/day) compared to the proposed plan (56,200 MTCO<sub>2</sub>e/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 CO<sub>2</sub> 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<sub>2</sub>e/day) compared to the proposed plan (61,500 MTCO<sub>2</sub>e/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 CO<sub>2</sub> 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<sub>2</sub>e/day) would be similar to the proposed plan (56,200 MTCO<sub>2</sub>e/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 CO<sub>2</sub> 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<sub>2</sub>e/day) would be similar to the proposed plan (61,500 MTCO<sub>2</sub>e/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 CO<sub>2</sub> 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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## 4 REFERENCES

### Chapter 1, “Introduction”

No sources are cited in this chapter.

### Chapter 2, “Comments and Responses on the Draft EIR”

BCDC. See San Francisco Bay Conservation and Development Commission.

California Air Resources Board. 2022 *Final 2022 Scoping Plan Update and Appendices*. Available: <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents>. Accessed February 25, 2025.

CARB. See California 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.

Metropolitan Transportation Commission and Association of Bay Area Governments. 2024 (December 13). Plan Bay Area 2050+ Draft Transportation Project List and Sea Level Rise Resilience Project List Briefer. Available: [https://mtc.ca.gov/sites/default/files/meetings/attachments/6161/7bv\\_24\\_1480\\_Attachment\\_D\\_Transportation\\_and\\_Resilience\\_Project\\_Lists\\_Briefer.pdf?cb=fd05bb70](https://mtc.ca.gov/sites/default/files/meetings/attachments/6161/7bv_24_1480_Attachment_D_Transportation_and_Resilience_Project_Lists_Briefer.pdf?cb=fd05bb70). Accessed December 23, 2025.

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### **Chapter 3, “Revisions to the Draft EIR”**

No sources are cited in this chapter.



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