

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
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Adam Noelting, Principal Planner
Metropolitan Transportation Commission (MTC)
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Plan Bay Area 2050+ – Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR)

Dear Adam Noelting:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Plan Bay Area 2050+ project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the January 2025 NOP.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

Plan Bay Area 2050+ is designed to serve as the 2025 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) for the San Francisco Bay Area. In addition to the focus on transportation and land use, Plan Bay Area 2050+ incorporates economic and environmental issues into the plan; taken as a package, the plan 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.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle

Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide ([link](#)). Caltrans will review the VMT analysis in the DEIR when it is available and has a comment on the following Transportation Strategy identified in the NOP:

Element	Theme	Strategy
Transportation	Maintain and Optimize the Existing System	Expand Freeways and Mitigate Impacts

The Climate Action Plan for Transportation Infrastructure (CAPTI) guiding principles include promoting projects that do not significantly increase passenger vehicle travel. Caltrans encourages sustainable transportation alternatives to highway capacity expansion that will not induce VMT and Greenhouse Gas (GHG) emissions.

Multimodal Transportation Planning

Please review and include reference to the *Caltrans District 4 Pedestrian Plan (2021)* and the *Caltrans District 4 Bike Plan (2018)* in the DEIR. These two plans studied existing conditions for walking and biking along and across the State Transportation Network (STN) in the nine-county Bay Area and developed a list of location-based and prioritized needs.

Please note that any Complete Streets reference should be updated to reflect Caltrans Director's Policy 37 ([link](#)) that highlights the importance of addressing the needs of non-motorists and prioritizing space-efficient forms of mobility, while also facilitating goods movement in a manner with the least environmental and social impacts. This supersedes Deputy Directive 64-R1, and further builds upon its goals of focusing on the movement of people and goods.

Integrated Transportation and Land Use Planning

Please review and include reference to the current California Transportation Plan (CTP) in the DEIR. CTP 2050 envisions that the majority of new housing located near existing housing, jobs, and transit, and in close proximity to one another will reduce vehicle travel and GHG emissions, and be accessible and affordable for all Californians, including disadvantaged and low-income communities. The location, density, and affordability of future housing will dictate much of our future travel patterns, and our ability to achieve the vision outlined in CTP 2050. Caltrans encourages MTC to consider and explore the potential of excess state-owned property for affordable housing development, per Executive Order N-06-19.

The DEIR should demonstrate how the future housing development patterns align with the agency's adopted VMT policies. Caltrans supports collaboration with external

agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through efficient and equitable land use planning and policies. MTC should also continue to coordinate with Caltrans to identify and implement necessary network improvements and impact mitigation.

Equity and Public Engagement

Caltrans is committed to advancing equity and livability in all communities. Equity will be achieved when everyone has access to what they need to thrive no matter their race, socioeconomic status, identity, where they live, or how they travel. Caltrans looks forward to collaborating with MTC to prioritize projects that are equitable and provide meaningful benefits to historically underserved communities.

Caltrans encourages MTC to foster meaningful, equitable and ongoing public engagement in the Plan Bay Area 2050+ development process to ensure future transportation decisions and investments reflect community interests and values. The public engagement process should include community-sensitive and equity-focused approaches seeking out the needs of individuals from underserved, Tribal, and low-income communities, the elderly, and individuals with disabilities.

Caltrans has comments pertaining to the following draft metrics identified in the NOP for the Plan's Equity and Performance Outcomes:

Guiding Principle	Question	Metric
Diverse	Will Bay Area residents be able to stay in place?	Share of Neighborhoods (Tracts) that Experience Displacement and Gentrification between 2023 and 2050

Please clarify how MTC will measure levels of gentrification given the phenomenon of gentrification is loosely and often subjectively defined and can therefore be difficult to measure empirically.

Native American Consultation

Per Federal Highway Administration (FHWA) and Federal Transit Administration (FTA) Certification review recommendations, each Native American Tribe should concur with MTC consultation methods and techniques. Please note some Tribes prefer the individualized consultation approach. MTC should contact the California Native American Heritage Commission to obtain a list of both federally recognized and non-federally recognized Native American Tribes.

Caltrans recommends the MTC reach out to each of the six federally recognized Tribes in the nine Bay Area counties and obtain their approval regarding consultation methods. These tribes include: the Cloverdale Rancheria of Pomo Indians, the Dry

Creek Rancheria Band of Pomo Indians, the Federated Indians of Graton Rancheria, the Kashia Band of Pomo Indians of the Stewarts Point Rancheria, the Koi Nation of Northern California, and the Lytton Rancheria Band of Pomo Indians.

The Plan Bay Area 2050+ DEIR should also consider the significance of Tribal cultural resources, including any regulations, policies, or standards by MTC to determine significance of tribal cultural resources, and significance of the proposed project's impacts on Tribal cultural resources. Please also include in the analysis of Climate Change its environmental impact on all Native American Tribes within and outside of sovereign land in the Bay Area.

Environment

Caltrans would like to reiterate comments previously provided on the following environmental strategies in the August 2024 review of the Plan Bay Area 2050+ draft Blueprint Strategies:

Element	Theme	Strategy
Environment	Reduce Risks from Hazards	Adapt to Seal Level Rise
	Expand Access to Parks and Open Space	Protect and Manage High-Value Conservation Lands

Regarding sea level rise, please clarify why 4.9 feet was chosen for a plan with a horizon 2050+. Consider another estimate of sea level rise for planning beyond 2050, based on the extended timeline indicated by the '+'. Many resource agencies, particularly the California Coastal Commission, emphasize managed retreat over further armoring or protection. While managed retreat is somewhat mentioned in the Long-Term Strategy Description, the primary focus of the strategy is on funding for armoring and protective measures. The adaptation planning approach should consider managed retreat as both a short- and long-term solution for community infrastructure and a way to mitigate the impacts of rising sea levels.

Caltrans suggests enhancing the strategy to protect and manage high-value conservation lands by starting with an important edit to the strategy name to not only 'protect' and 'manage' high-value conservation lands but also ensure connectivity of those lands, creating a larger mosaic of connected and conserved high-value conservation lands. We propose changing the name of this strategy to 'Protect, Manage, and Connect High-Value Conservation Lands.' The focus should be on identifying lands that can be connected as well as protected, and using appropriate land-use and permitting to establish sufficient natural connectivity corridors that interlink protected and managed high-value conservation lands. Creating a mosaic of

connected conservation lands will provide greater ecological stability to those individual lands, as well as facilitate movement and genetic mixing, which is crucial for the stability and efficacy of these lands over the long term. Emphasizing connectivity can also serve as a showcase and part of mitigation efforts to offset impacts from future development.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Llisel Ayon, Acting Branch Chief, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please visit Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Llisel Ayon". The signature is written in a cursive, flowing style.

Llisel Ayon
Acting Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse