



July 24, 2025

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**RE: Comments on the Draft Environmental Impact Report, SCH# 2025020168, for the Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (2025 Blueprint) for the Sacramento Region**

Dear Clint Holtzen:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the Sacramento Area Council of Governments' (SACOG) Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (2025 Blueprint). The Delta Stewardship Council (Council) recognizes the objectives of the 2025 Blueprint, as described in the 2025 Blueprint 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 the requirements of the Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, § 85000 et seq.; Delta Reform Act) pertaining to the 2025 Blueprint and provides the Council's comments on the 2025 Blueprint 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.)

SACOG's 2025 Blueprint is a regional transportation plan for a six-county region that includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties and the 28 cities in these counties. Portions of Sacramento and Yolo Counties include land within the Delta.

### **Delta Reform Act Requirements for Regional Transportation Plans and Sustainable Communities Strategies**

The Delta Reform Act requires metropolitan planning organizations (MPOs) to consult with the Council when preparing a sustainable communities strategy (SCS) that includes land within the primary or secondary zones of the Delta. (Wat. Code § 85212.) Council staff and SACOG staff met for this purpose on March 4, 2025, and April 4, 2025.

The Delta Reform Act also requires SACOG provide a draft SCS to the Council no later than 60 days prior to the adoption of the final metropolitan transportation plan. (Wat. Code § 85212.) SACOG submitted its 2025 Blueprint to Council staff on June 6, 2025.

### **Council Review and Input on the Draft EIR and the 2025 Blueprint**

This section summarizes Council staff's review of and input on the Draft EIR for the 2025 Blueprint. It also summarizes Council staff's comments on the Draft EIR.

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

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

- the consistency of local and regional planning documents with the ecosystem restoration needs of the Delta.
- whether the land set aside for natural resource protection is sufficient to meet the Delta ecosystem needs.

### a. Consistency with Restoration Needs

The Delta Plan designates six priority habitat restoration areas (PHRAs) that have the greatest potential for large-scale habitat restoration (Delta Plan, Chapter 4, p. 4-47 to 4-50). Delta Plan Policy **ER P3** (Cal. Code Regs., tit. 23, § 5007.) states that significant adverse impacts to the opportunity to restore habitat must be avoided or mitigated in these PHRAs (depicted in Appendix 5:

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

Two PHRAs are located within the SACOG region: the Yolo Bypass, which passes through Yolo County; and the Cosumnes/Mokelumne confluence located at the southern edge of Sacramento County. In its March 4, 2025, comments on the Notice of Preparation (NOP) for the Draft EIR, Council staff requested that the Draft EIR describe the planned land uses identified in these areas and describe how significant adverse impacts to the opportunity to restore habitat in these locations would be avoided or mitigated. The Draft EIR identifies that growth projected within the Delta in the 2025 Blueprint is located in areas designated as Developing Communities located between, and adjacent to, areas designated as Established Communities in the City of West Sacramento and is consistent with Yolo County's adopted General Plan Land Use Diagram. The Draft EIR further states that none of this future development is anticipated to occur in the PHRAs (Draft EIR p. 3.10-23)

**Finding:** Based on the review of the 2025 Blueprint and Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency in the Draft EIR of the 2025 Blueprint with Delta Plan policy **ER P3**.

#### b. Sufficiency of Lands Set Aside

The 2025 Blueprint does not specifically address setting aside lands for natural resource protection. SACOG notes that this is the prerogative of lead agencies that adopt land use plans and implement projects, such as city and county agencies, transit providers, land developers. However, the 2025 Blueprint incentivizes natural resource protection by encouraging growth in existing population centers and by maximizing the efficiency of the existing transportation network. Council staff recognizes SACOG is continuing the principles established in previous cycles of the metropolitan transportation plan/sustainable communities strategy (MTP/SCS) that encourage compact, mixed-use development; a variety of housing types and transportation modes; quality design; and natural resource conservation. The 2025 Blueprint aims to continue to accommodate approximately two-thirds of the region's new housing and the majority of its job growth in existing downtowns, commercial corridors, and suburbs. The remaining housing and job growth is accommodated within more than two dozen areas designated as Developing Communities to support robust job growth outside of the traditional job centers of the region by planning jobs, housing, and public transportation in clusters.

Senate Bill 375 (Stats. 2008, ch. 728.) provides California Environmental Quality Act (CEQA) streamlining benefits for certain projects that are consistent with the MTP/SCS land use and transportation pattern. The 2025 Blueprint and Draft EIR aim to facilitate these CEQA streamlining benefits for qualifying residential, mixed-use, and transit priority projects that are consistent with the general use designation, density, building intensity, and applicable policies specified in the 2025 Blueprint (Draft EIR 2-46, 2025 Blueprint examples pg. 30. 58). The 2025 Blueprint Appendix E map and figure illustrate the location of the High Frequency Transit and amount of Housing and Employment within High-Frequency Transit Areas, 2020-2050 (Fig. 2-7 and Fig. 2-8). Based on the mapped locations, the 2025 Blueprint would not provide CEQA streamlining benefits to projects outside of existing city boundaries, within the Delta, or within any PHRA. Based on the locations of the High Frequency Transit areas, the 2025 Blueprint is not likely to incentivize development in areas within the Delta that are necessary to meet the Delta's ecosystem needs.

**Finding:** Based on review of the 2025 Blueprint and the Draft EIR, and in compliance with the Water Code section 85212, Council staff has not identified any inconsistency of the 2025 Blueprint with Delta Plan policy **ER P3**.

## 2. Consistency with the Delta Plan

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

### a. Land Use Pattern

Delta Plan Policy **DP P1** (Cal. Code Regs., tit. 23, § 5010.) places certain limits on new urban development within the Delta. New residential, commercial, and industrial development must be limited to areas that city or county general plans designate for that development as of the date of the Delta Plan's adoption of May 16, 2013. This policy is intended to strengthen existing Delta communities while protecting farmland and open space, providing land for ecosystem restoration needs, and reducing flood risk.

A state or local agency that proposes to carry out, approve, or fund an action that occurs in whole or in part in the Delta (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 implementation of the project. (Wat. Code § 85225.) The Delta Reform Act exempts from this requirement actions within the Secondary Zone of the Delta that a MPO determines are consistent with its SCS and that the State Air Resources Board has determined would achieve regional greenhouse gas emission reduction targets. (Wat. Code § 85057.5, subd. (b)(4).) SACOG is the MPO for the Sacramento region, which contains portions of the Secondary Zone of the Delta. Thus, Water Code section 85057.5, subdivision (b)(4), provides SACOG with a role in shaping the State's Delta policy.

Council staff's NOP comment letter dated March 4, 2025, requested the Draft EIR analyze whether the 2025 Blueprint would include new urban development within the Delta. The Draft EIR acknowledges consistency with policy **DP P1** in the regulatory setting of the Land Use and Planning Section (3.10) as well as the Aesthetics Section (3.1). Regional growth anticipated within or adjacent to the Delta

would limit residential, commercial, or industrial development to areas that city or county general plans designate for that type of development.

The Draft EIR states “the majority of development under the 2025 Blueprint would occur as infill development in Center and Corridor Communities and Established Communities, in accordance with the adopted land use plans and zoning ordinances of the cities or counties in the plan area.” And further, “[t]he Developing Communities are located between and adjacent to Established Communities in the City of West Sacramento and are consistent with the County’s adopted General Plan Land Use Diagram.”

**Finding:** Based on the review of the 2025 Blueprint and Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the 2025 Blueprint with Delta Plan policy **DP P1**.

#### b. Transportation Investment

The recommended transportation projects in the 2025 Blueprint include investments in both rural and urban areas located within the Delta. These transportation projects would advance Delta Plan recommendation **DP R11**, to protect and improve existing recreation opportunities while seeking ways of providing new and better coordinated opportunities. The 2025 Blueprint includes projects within the Delta that support recreation, such as proposed new and improved bicycle and pedestrian routes connecting West Sacramento and Clarksburg and a trail system connecting all six counties (Draft 2025 Blueprint, Appendix A).

The Delta Plan also recommends providing adequate infrastructure in the Delta. Recommendation **DP R5** states "The California Department of Transportation, local agencies, and utilities should plan infrastructure, such as roads and highways, to meet needs of development consistent with sustainable community strategies, local plans, the Delta Protection Commission’s Land Use and Resource Management Plan for the Primary Zone of the Delta, and the Delta Plan." A number of planned transportation investments in the 2025 Blueprint would improve the capacity and safety of roads and highways in the Delta. The 2025 Blueprint also includes multiple projects to restore pavement and redesign streetscapes to be more pedestrian and bike friendly. Roadway improvement projects in the Delta described in the 2025

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Blueprint and Draft EIR would improve agricultural and goods movement travel and improve accessibility for slow-moving farm equipment.

**Finding:** Based on a review of the 2025 Blueprint and Draft EIR, in compliance with Water Code section 85212, Council staff has not identified any inconsistency of the recommended transportation projects identified in the 2025 Blueprint with Delta Plan recommendations concerning transportation in the Delta.

### **CLOSING COMMENTS**

Pursuant to Water Code section 85212, Council staff has reviewed and provided advice and input on the Draft EIR and 2025 Blueprint 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 SACOG to continue to engage Council staff following the adoption of the 2025 Blueprint to coordinate implementation and subsequent plan updates. Please contact Eva Bush at (916) 284-1619 or [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

Sincerely,

A handwritten signature in dark ink, appearing to read 'Jeff Henderson', with a long horizontal flourish extending to the right.

Jeff Henderson  
Deputy Executive Officer

## Attachment 1

### Suggested edits regarding the Delta Stewardship Council and the Delta Plan

Deletions are in ~~striketrough~~, additions in underline.

#### **Pg 3.2-5 Under heading: Delta Reform Act**

The Delta ~~Protection~~ Plan, which was enacted by the Delta Stewardship Council, identifies agriculture as the principal land use in the Delta, but indicates that in recent decades the total area of agricultural lands has declined, as has the overall percentage of lands in agricultural use. The Delta ~~Protection~~ Plan states that the continued viability of agriculture in the Delta will require the protection of sufficient farmland and fresh water to support commercially viable operations and provide ways for agriculture to co-exist with habitat restoration.

#### **Pg 3.4-5 Under heading: Sacramento-San Joaquin Delta Reform Act**

In November 2009, the California Legislature enacted the Sacramento-San Joaquin Delta Reform Act of 2009 (Delta Reform Act) (California Water Code Section ~~10610~~ 85000 et seq.), also known as 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.

#### **Pg. 3.4-6 Sacramento San Joaquin Delta Reform Act of 2009**

The Delta Reform Act expressly provides that “covered actions” do not include the following: (1) regional transportation plans (RTPs), such as this proposed 2025 Blueprint; 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 SACOG has determined is consistent with the proposed 2025 Blueprint (California Water Code Section 85057.5). However, the ~~DSC reviews any plan that includes land within the Delta zones, whether or not it is a covered action.~~ Delta Reform Act directs the Council to review and provide timely advice to local and regional planning agencies regarding the consistency of local



and regional planning documents, including sustainable communities strategies (SCS) with the Delta Plan (Wat. Code section 85212.) Metropolitan planning organizations that have a planning area crossing these boundaries are required to follow ~~a~~ this consultation procedure with the DSC. This procedure includes early coordination to determine consistency of a proposed ~~RTP~~ SCS with the Delta Plan.

**Pg. 3.10-4 Sacramento San Joaquin Delta Reform Act of 2009**

The Delta Plan's 14 15 regulatory policies ~~were approved by the Office of Administrative Law and became effective with~~ are legally enforceable regulations set forth in California Code of Regulations, title 23, sections 5001 et seq. ~~on September 1, 2013.~~

**Pg. 3.15-15**

The ~~2009~~ Delta Reform Act (~~Public Resources~~ Wat. Code section 29759 85000 et. seq.) requires the DPC to prepare an economic sustainability plan (ESP) for the Delta region.