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# **ACTION ITEM**

### Sacramento Area Council of Governments Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy

# Summary

Kacey Lizon, a deputy executive director with the Sacramento Area Council of Governments (SACOG), will make a presentation on SACOG's Draft 2025 Metropolitan Transportation Plan/Sustainable Communities Strategy (2025 Blueprint) and its relationship to the Delta Plan. Pursuant to Water Code section 85212, the Council is required to review and provide advice regarding a metropolitan planning organization's draft sustainable communities strategy if the regional transportation plan includes land within the Primary and Secondary zones of the Delta. Based on their review, Council staff has not identified any inconsistency of the 2025 Blueprint with the Delta Plan and is seeking Council approval to submit the draft comment letter to SACOG.

## **Requested Action**

The Council's authority to review and provide advice for a sustainable communities strategy (SCS) is pursuant to Water Code section 85212. Based on their review of the 2025 Blueprint and Draft Environmental Impact Report (Draft EIR), Council staff has not identified any inconsistency of the 2025 Blueprint with the Delta Plan and is recommending the Council approve a draft comment letter on the Draft EIR and 2025 Blueprint.

## Background

The Sacramento-San Joaquin Delta Reform Act of 2009 (Wat. Code, § 85000 et seq.; Delta Reform Act) grants the Council specific authority to review and advise local and regional planning agencies regarding the consistency of local and regional planning documents, which includes a SCS, with the Delta Plan. (Wat. Code, § 85212.) The Delta Reform Act also requires a metropolitan planning organization (MPO) preparing an SCS that is part of regional transportation plan that includes land within the Primary Zone or Secondary Zone of the Delta to "consult with the [C]ouncil early in the planning process regarding the issues and policy choices relating to the Council's advice." (Wat. Code, § 85212.)

An SCS is one element of a larger regional transportation plan, (Gov. Code, § 65080.) which is exempt from being a covered action. (Wat. Code, §85057.5, subd. (b)(3).) Additionally, a plan, program, project, or activity within the Secondary Zone of the Delta that an MPO determines is consistent with an SCS that the State Air Resources Board has determined would achieve regional greenhouse gas emission reduction targets also is exempt from being a covered action. (Wat. Code, § 85057.5, subd. (b)(4).)

# SACOG 2025 Blueprint

SACOG is designated by the federal government as the MPO for the Sacramento region, which includes El Dorado, Placer, Sacramento, Sutter, Yolo, and Yuba Counties and the 22 cities those include. Portions of Sacramento and Yolo Counties include land within the Primary Zone and Secondary Zone of the Delta. As an MPO, SACOG is charged with preparing a regional transportation plan that must be updated every four years in coordination with each local government. SACOG adopted a Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for the Sacramento region in 2012 and updated the MTP/SCS in both 2016 and 2020.

The 2025 Blueprint represents the Sacramento region's third update to the transportation investment and land use strategy designed to achieve regional greenhouse gas emission reduction targets. The 2025 Blueprint is a transportation investment and land use strategy that aims to help the region improve air quality, preserve open space and natural resources, and reduce greenhouse gas emissions. The 2025 Blueprint and supporting documents are available at: <a href="https://www.sacog.org/planning/blueprint">https://www.sacog.org/planning/blueprint</a>.

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#### Staff Activity and Notice of Preparation Comments

Council staff met with SACOG staff twice this calendar year to discuss the 2025 Blueprint. During these meetings, SACOG shared the Preferred Land Use Scenario, which consists of projections of future land uses, a list of transportation improvements, a revenue forecast, and a pricing strategy, so that Council staff could evaluate consistency with the Delta Plan. SACOG and Council staff also discussed ways in which the 2025 Blueprint could be consistent with the Delta Plan and support the Council's ability to achieve the coequal goals.

## 2025 Blueprint and Draft EIR Comments

Council staff submitted a comment letter on the Notice of Preparation (NOP) for the Draft EIR for the 2025 Blueprint on March 4, 2025 (see Attachment 1). Additionally, Council staff has prepared a draft comment letter on the 2025 Blueprint and associated Draft EIR (see Attachment 2). The 45-day comment period for the 2025 Blueprint and Draft EIR ends August 8, 2025.

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

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

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

Council staff's analysis of these considerations is outlined in the proposed comment letter (Attachment 2) and summarized below.

#### Consistency with Restoration Needs

The Delta Plan designates six priority habitat restoration areas (PHRAs) that have the greatest potential for large-scale habitat restoration (Delta Plan, 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: <u>http://deltacouncil.ca.gov/sites/default/files/2015/09/Appendix%205.pdf</u>).

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. The Draft EIR identifies that the growth projected within the Delta in the 2025 Blueprint is limited to 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, and 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**.

#### 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. 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. The 2025 Blueprint aims to continue to accommodate approximately two-thirds of the region's new housing and most 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. Based on the mapped locations in the Draft EIR, 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 result in 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**.

## *Consistency with the Delta Plan Land Use Pattern*

Delta Plan policy **DP P1** (Cal. Code Regs., tit. 23, § 5010.) places certain limits on new urban development within the Delta. New residential, commercial, and industrial development must be limited to areas that city or county general plans designate for that development as of the date of the Delta Plan's adoption 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.

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."

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

#### Transportation Investments

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 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, and 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.

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#### Staff Recommendation

Staff recommends the Council approve the draft comment letter on the Draft EIR and 2025 Blueprint (Attachment 2). Following Council approval, staff will submit the letter to SACOG.

#### **Fiscal Information**

Not applicable.

#### List of Attachments

Attachment 1: Council Staff's NOP Comment Letter, March 4, 2025

Attachment 2: Council Staff's Draft 2025 MTP/SCS and Draft EIR Comment Letter

## Contact Jeff Henderson Deputy Executive Officer Jeff.Henderson@deltacouncil.ca.gov

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