

DELTA PROTECTION COMMISSION

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July 20, 2021

MTC Public Information
 Attn: Draft Plan/Draft EIR Comment
 375 Beale Street, Suite 800
 San Francisco, CA 94105

Re: Plan Bay Area 2050 and Draft Environmental Impact Report

Dear Sir or Madam:

Thank you for providing the Delta Protection Commission (Commission) with the opportunity to review Plan Bay Area 2050 and the Draft Environmental Impact Report (EIR). Plan Bay Area 2050 serves as the Regional Transportation Plan and Sustainable Communities Strategy for the nine-county San Francisco Bay Area, which provides integrated strategies for housing, the economy, transportation, and the environment.

The Commission is a State agency charged with ensuring orderly, balanced conservation and development of Delta land resources and improved flood protection. Proposed local government projects within the Primary Zone of the Legal Delta must be consistent with the Commission's Land Use and Resource Management Plan (LURMP). Portions of Contra Costa and Solano counties are in the Primary Zone.

For those portions of Contra Costa and Solano counties that are in the Secondary Zone and outside of the Legal Delta, we submit comments under Public Resource Code Sections 29770(d) and 5852-5855 (The Great California Delta Trail Act). These sections state that the Commission may comment on projects in the Secondary Zone that impact the Primary Zone and direct the Commission to develop and adopt a plan and implementation program for a continuous regional recreational corridor extending throughout the five Delta counties linking to the San Francisco Bay Trail and Sacramento River Trail. Several of the Plan Bay Area's Priority Development Areas and Priority Production Areas fall within the Secondary Zone and could impact Primary Zone resources.

Commission comments on Plan Bay Area 2050 and the Draft EIR focus on five areas:

Great California Delta Trail: We appreciate Plan Bay Area 2050 strategies – T8 (Complete Streets Network), T9 (Regional Vision Zero Policy), and EN6 (Modernize and Expand Parks, Trails and Recreation Facilities) – and Draft EIR Mitigation Measure AQ-3(d) that emphasize the need for investment in local and regional trails. As noted in our earlier comment letter on the Notice of Preparation, the Commission completed the Delta Trail Western Blueprint Report for Contra Costa and Solano Counties in 2010 and is currently preparing the Delta Trail Master Plan for the five-county Delta region, including Contra Costa and Solano counties. The completion of this regional trail system could help Association of Bay Area Governments and Metropolitan Transportation Commission implement Plan Bay Area 2050 strategies.

Movement of People in the Northern California Megaregion: Plan Bay Area 2050's discussion of the Northern California Megaregion, an area that includes the Delta, focuses on economic needs, goods movement, high-speed rail, and collaboration on major transportation projects. The plan should also recognize the movement of people between the Bay Area, Sacramento, and Stockton regions on megaregion highways. The Delta transportation system is experiencing strain because commuters and other travelers are bypassing congested interstate highways for Delta highways, which are often located on narrow, winding levee tops and serve as important corridors for vehicles serving the region's agricultural economy. They cannot handle substantial traffic from megaregional travelers, particularly in small unincorporated towns with limited pedestrian facilities. This issue requires creative approaches to ensure that bicyclists, drivers, and pedestrians remain safe.

Potential Effects of Remote Work on Regional Transportation: While we understand that the long-term effects of COVID-19 pandemic remain uncertain and the Plan Bay Area process started before the pandemic began, the plan's discussion of the potential effects of remote work on transportation is incomplete. The text only provides a brief mention of remote work and transportation:

New revolutions in the transportation field, like self-driving cars or the growing acceptance of remote work, could remake the Bay Area's transportation system once again, or they may fade away as fads never fully realized. (p. 14)

Dismissing remote work as a fad ignores evidence showing greater acceptance of the practice by employers and greater desire to work at home by employees since the pandemic began. A wide array of jobs shifted to remote locations; many employers have remained cautious about moving daily work and meetings back into office settings. Such a sea change in remote work seems unlikely to fade away completely. The Draft EIR cannot possibly address the potential impacts of remote work if the plan does not assess what they are. Plan Bay Area 2050 should consider the repercussions of this change and suggest possible strategies other than traditional transportation demand management initiatives.

Broadband Infrastructure Improvements: We appreciate the attention that Plan Bay Area 2050 pays to supporting the expansion of broadband infrastructure, particularly for low-income households. Fortunately, the federal and state governments have increasingly recognized the insufficiency of existing broadband infrastructure, especially in light of enhanced demand during the pandemic, and are providing funding for improving networks. The plan should provide additional guidance on how this

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funding can be used, including recognizing the physical obstacles to high-speed internet that rural areas face. We encourage Plan Bay Area 2050 to take any steps to speed broadband infrastructure development since the region does not have decades to resolve this issue.

Sacramento-San Joaquin Delta National Heritage Area: The Commission is the local coordinating entity for the newly established Sacramento-San Joaquin Delta National Heritage Area (NHA), a federal designation that includes portions of northern Contra Costa County and southern Solano County. NHAs are places where natural, cultural, historic, and recreation resources combine to form a cohesive, nationally important landscape. In areas throughout the country, NHAs adopt a grassroots, community-driven approach to heritage conservation and economic development. The Delta NHA provides an opportunity to provide more jobs in housing-rich places such as Antioch, Benicia, Brentwood, Hercules, Martinez, Oakley, Pittsburg, Rio Vista, Vallejo, and nearby unincorporated areas while also promoting historic preservation, natural resource conservation, and recreation. Broadband, highway, and transit infrastructure improvements in these areas will be critical in encouraging job creation.

Thank you for the opportunity to provide input. Please contact Blake Roberts, Program Manager I, at (530) 650-6572 for any questions regarding the comments provided.

Sincerely,



Erik Vink
Executive Director

cc: Diane Burgis, Contra Costa County Board of Supervisors and Commission Member
John Vasquez, Solano County Board of Supervisors and Commission Member
George Fuller, City of Oakley City Council and Commission Member