



## Plan Bay Area 2050+

### DEIR, Table 2-14: Regional Growth Forecast of Population, Employment, Households, and Housing Units

**Summary:** The growth forecasts rely on assumptions that diverge significantly from current demographic trends and widely used modeling approaches.

**Action:** The MTC/ABAG governing boards should direct staff to fully explain and, if necessary, correct, the discrepancy between MTC’s projected 24% population increase from 2020–2050 and the California Department of Finance Demographic Research Unit (DRU) projection of only 6.5%.

	Regional Growth Forecast				
	2020	2035	2050	Change 2020 to 2050	Change 2020 to 2050 (%)
Population	7,749,000	8,476,000	9,586,000	1,837,000	24%
Employment	4,025,000	4,855,000	5,436,000	1,411,000	35%
Households	2,798,000	3,312,000	3,796,000	998,000	36%
Housing Units	2,875,000	3,486,000	3,996,000	1,121,000	39%

Notes: Whole numbers have been rounded to the nearest 1,000.

Source: Data provided by MTC and ABAG in 2025; compiled by Ascent in 2025.

#### DRU population projections

Region	Actual		Forecast	% Change		% decrease in
	2000	2025	2050	2000 - 2025	2025 - 2050	Chg.
Alameda	1,457,185	1,662,482	1,840,752	14.1%	10.7%	-23.9%
Contra Costa	962,076	1,158,225	1,359,291	20.4%	17.4%	-14.9%
Marin	247,590	254,550	245,637	2.8%	-3.5%	-224.6%
Napa	125,396	136,124	142,654	8.6%	4.8%	-43.9%
San Francisco	780,614	842,027	854,332	7.9%	1.5%	-81.4%
San Mateo	707,965	748,337	764,168	5.7%	2.1%	-62.9%
Santa Clara	1,690,366	1,922,259	1,957,725	13.7%	1.8%	-86.6%
Solano	399,476	449,839	506,056	12.6%	12.5%	-0.9%
Sonoma	462,958	482,848	479,201	4.3%	-0.8%	-117.6%
<b>Bay Area</b>	<b>6,833,626</b>	<b>7,656,691</b>	<b>8,149,816</b>	<b>12.0%</b>	<b>6.4%</b>	<b>-46.5%</b>
California (ex. B.A.)	27,423,163	31,872,410	32,669,262	16.2%	2.5%	-84.6%

Actual figures are as of January 1st of a given year. Forecast figures are as of July 1st of a given year. Source: “ABAG’s Bay Area Population Projections Are Way Too High”, Gaetan Lion, *Medium.com*. ([Article](#))

<https://dof.ca.gov/forecasting/demographics/projections/>

## Observations & Questions:

1. **Population Growth Assumptions:** MTC staff project an increase of 1.8 million residents between 2020 and 2050 (24% growth), almost four times the Department of Finance projection of 6.5% for the Bay Area. What accounts for this divergence?
2. **Reliability of Linked Forecasts:** If population projections are inflated and unsupported, what tools, calibration data, and validation checks were used to ensure accuracy of the other forecasts:
  - employment (+35%),
  - household formation (+36%), and
  - housing unit growth (+39%)
3. **Relationship to the BIA Settlement:** DEIR Table 1.1 outlines components of the Building Industry Association (BIA) settlement agreement. The settlement seems to impose industry-specific obligations that may influence forecast assumptions and methodology.
  - What is the relationship between those obligations and the requirements of the Regional Housing Needs Allocation (RHNA)?
  - To what extent do industry-driven commitments influence or constrain regional demographic and housing forecasts?

**Why this matters:** Inflated and unrealistic growth assumptions may undermine public trust, misdirect resources, and result in unrealistic planning for housing, transportation, the economy, and the environment.

## Resource Materials:

- [https://catalystsca.org/wp-content/uploads/2025/11/DOF\\_DRU\\_Population\\_Projections\\_9\\_County\\_Area.xlsx](https://catalystsca.org/wp-content/uploads/2025/11/DOF_DRU_Population_Projections_9_County_Area.xlsx)
- <https://dof.ca.gov/forecasting/demographics/projections/>
- <https://medium.com/@gaetanlion/abags-bay-area-population-projections-are-way-too-high-8ac2c861fc2e>



## Plan Bay Area 2050+

### DEIR, Table 1-1: Building Industry Association Settlement Agreement Components and Compliance Information

**Summary:** The Draft EIR references the 2013 Building Industry Association’s settlement that followed litigation over the first Plan Bay Area. The section acknowledges that the settlement created “ongoing obligations” and the responsibility to create the Regional Housing Growth Total and Forecasted Development Pattern for MTC and ABAG, but it provides little insight into how those obligations influence planning assumptions, housing forecasts, or transportation investment decisions.

**Action:** The MTC/ABAG governing boards should direct staff to share the Settlement Agreement and fully explain the agreements impacts on growth, RHNA, and how the settlement impacts modeling assumptions or policy choices.

#### Observations & Questions:

1. **Lack of Transparency About Settlement Obligations:** What are the obligations? How do they affect growth forecasts? How do they impact Regional Housing Need Assessments and allocations? Who benefits from the settlement obligations? What is the duration of the settlement? Who evaluates the impact of the
2. **Lack of Clarity about how the Settlement Agreements Influence Housing Assumptions:** BIA represents development interests. How do the Settlement Agreements impact housing production quotas, the Regional Housing Need Allocation (RHNA) assumptions, or market-rate vs. affordable housing production.
3. **Procedural vs Impact on Community and Constituents:** How does the Settlement Agreement influence local infrastructure capacity, displacement, environmental impact, and long-term affordability?

**Why this matters:** City and county planners count on DEIR disclosures to understand regional expectations. The lack of information, hampers governments’ ability to evaluate Plan Bay Area and the draft EIR. Greater transparency is essential to assess whether Plan Bay Area’s housing, transportation, economic, and environmental reflect independent, evidence-based planning, or obligations negotiated through previous out-of-court settlements.

**Table 1-1: Building Industry Association Settlement Agreement Components and Compliance Information**

Agreement Paragraph	Agency Obligation	Timing	Where Addressed	Compliance Completed
6a.	<p><b>Regional Housing Control Total and Forecasted Development Pattern.</b> 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.</p>	<p>Regional Housing Control Total must be determined and disclosed prior to issuance of a Notice of Preparation for the SCS/RTP EIR, or if no EIR is prepared, then at least 6 months before a draft SCS is released for public review.</p>	<p>The agencies shall use the adopted methodology for determining the Regional Housing Control Total in the final Plan Bay Area SCS.</p>	<p>Yes. For Plan Bay Area 2050+, the Regional Housing Control Total was determined using the same, adopted Regional Growth Forecast methodology originally approved by ABAG in September 2019 for Plan Bay Area 2050. This methodology was carried forward and used to prepare the updated Regional Growth Forecast for Plan Bay Area 2050+.</p> <p>The updated forecast was shared publicly in draft form in November 2023, and has been referenced throughout the update process, including as part of the Final Blueprint Approval Resolution in January 2025. While the updated forecast was not formally approved as a stand-alone item (as was done in the previous planning cycle), it was disclosed on multiple occasions and incorporated into the Plan Bay Area 2050+ Final Blueprint, thus fulfilling the requirement to determine and disclose the Regional Housing Control Total prior to release of the NOP and the draft SCS.</p>
6b.	<p><b>Validation.</b> The agencies shall implement robust monitoring of regional development patterns, at a minimum tracking building permit issuance, number of units in PDAs, and type of residential development.</p>	<p>Monitoring would be done prior to release of the SCS.</p>	<p>The results shall inform each update of the Plan Bay Area SCS.</p>	<p>Yes. For Plan Bay Area 2050+, MTC-ABAG tracked residential permitting activity in both PDA and non-PDA areas and presented this information at a public meeting in May 2024. This monitoring fulfilled the requirement to validate regional development patterns before the SCS was made available for public review.</p> <p><a href="https://mtc.legistar.com/LegislationDetail.aspx?ID=6658399&amp;GUID=82B81AFC-BDDA-46F6-BAC4-4CE62D002180&amp;Options=&amp;Search=">https://mtc.legistar.com/LegislationDetail.aspx?ID=6658399&amp;GUID=82B81AFC-BDDA-46F6-BAC4-4CE62D002180&amp;Options=&amp;Search=</a>.</p> <p>In addition, MTC-ABAG continues to track housing growth through its Vital Signs regional monitoring initiative, which provides ongoing data on</p>

Agreement Paragraph	Agency Obligation	Timing	Where Addressed	Compliance Completed
				<p>housing permits and development trends across the Bay Area. Together, these efforts demonstrate compliance with the validation obligation and ensure that updated development patterns informed the Plan Bay Area 2050+ process.</p> <p><a href="https://vitalsigns.mtc.ca.gov/indicators/housing-permits">https://vitalsigns.mtc.ca.gov/indicators/housing-permits</a>)</p>
6c.	<p><b>Feasibility Analysis.</b> The agencies shall prepare an update to the PDA Feasibility Analysis to include analysis of local land use policies, market demand, financial feasibility, site-related issues, financing, and infrastructure needs.</p>	<p>The update shall be published prior to issuance of a Notice of Preparation for the SCS/RTP EIR or, if no EIR is prepared, then at least 6 months before a draft SCS is released for public review.</p>	<p>The results of the analysis shall inform each update of the Plan Bay Area SCS.</p>	<p>Yes. MTC-ABAG fulfilled this obligation as part of the Plan Bay Area 2050 development process. The results of updated PDA feasibility analysis informed Plan Bay Area 2050 and continue to inform the update process for Plan Bay Area 2050+.</p>
6d.	<p><b>Assumptions and Disclosure.</b> The agencies shall disclose and accept public comments on the key assumptions and descriptors to be used in preparation of each SCS update.</p>	<p>Key assumptions shall be disclosed prior to preparation of a document comparable to the Initial Vision Scenario, setting forth development scenarios, or if no such document is prepared, assumptions shall be disclosed at least 6 months prior to public release of a draft SCS. Key descriptors shall be disclosed with release of the SCS.</p>	<p>Appropriate assumptions and descriptors are to be used in preparation of the final Plan Bay Area SCS.</p>	<p>Yes. For Plan Bay Area 2050+, the disclosure of key assumptions built on the Regional Growth Forecast methodology originally adopted by ABAG in September 2019 for Plan Bay Area 2050. That methodology was carried forward to develop the updated Regional Growth Forecast for Plan Bay Area 2050+, which was disclosed publicly in draft form in November 2023 and incorporated into the Final Blueprint Approval Resolution in January 2025.</p> <p>For Plan Bay Area 2050+, the Blueprint strategies and related land use modeling assumptions were refined through multiple stages of engagement and disclosure. Staff began public and partner engagement in summer 2023 to inform revisions, and the Joint MTC Planning Committee and ABAG Administrative Committee approved the revised Draft Blueprint strategies and Growth Geographies in January 2024.</p>

Agreement Paragraph	Agency Obligation	Timing	Where Addressed	Compliance Completed
				<p>The performance outcomes of the Draft Blueprint were released in June 2024, followed by additional engagement in summer 2024 to support further refinements. The Final Blueprint strategies were approved by the MTC Commission and ABAG Executive Board in January 2025, with updated performance outcomes shared in June 2025.</p> <p>These steps ensured that both the Regional Growth Forecast and the Blueprint strategies were disclosed with sufficient opportunity for public comment prior to release of the draft SCS.</p>



## Plan Bay Area 2050+

### DEIR, Table 4-34: Summary Comparison of Impacts: Proposed Plan and Alternative Plans

**Summary:** A Program Environmental Impact Report is intended to analyze The Plan, the No Plan alternative, and other feasible alternatives in order to make an informed choice. Table 4-34 displays the inadequacy of the plan’s proposed mitigation measures. Of the 67 findings and proposed mitigation, 52% of anticipated hazards and risks are deemed “substantial and unavoidable.” When rated across Alternative Plans, the outcomes are negligible.

**Action:** The MTC/ABAG governing boards should direct staff to address two problems. The first is to provide alternatives that show real distinctions and alternative ways to envision the future of the Bay Area. The second problem is to acknowledge and solve for the high level of negative impact that can’t be solved with proposed mitigation measures.

### Observations & Questions:

1. **Avoidance/Reduction of Impacts:** Table 4-34 shows 35 of the 67 environmental impacts, even after mitigation, are “significant and unavoidable.” When rated across Alternative Plans, the outcomes are negligible.
2. **Ensuring Feasibility and Reasonableness:** To understand the disregard for human life and quality of life, 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. To be reasonable and visionary, the Plan should include a section on the impact of artificial intelligence on transportation and the economy.
3. **Legal Compliance:** The identification of and detailed evaluation of alternatives is a key legal requirement of CEQA. This plan seems to fail to adequately analyze a reasonable range of feasible alternatives.

**Why this matters: Statement of Overriding Considerations (SOC).** Because these environmental impacts persist even after mitigation measures are applied, the MTC/ABAG boards cannot approve the plan without first adopting a SOC. Under CEQA guidelines, the SOC allows agencies to declare that the benefits of a program outweigh its unmitigated risks and harms. In this case, MTC staff will likely urge the boards to cite the Bay Area’s severe “housing crisis” as the overriding consideration as the rationale to justify approval. But as we saw in Table 2-14, the population projections are inflated and unrealistic.

Table 4-34: Summary Comparison of Impacts

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>3.2 Aesthetics and Visual Resources</b>				
<b>Impact AES-1:</b> Have a substantial adverse effect on a scenic vista	SU	>	=	<
<b>Impact AES-2:</b> Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway	SU	>	=	<
<b>Impact AES-3:</b> In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings and in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality	SU	>	=	<
<b>Impact AES-4:</b> Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	SU	>	=	<
<b>3.3 Agriculture and Forestry Resources</b>				
<b>Impact AGF-1:</b> Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use, or conflict with existing zoning for agricultural use, or a Williamson Act contract	SU	>	=	>
<b>Impact AGF-2:</b> Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104[g])	SU	>	=	<
<b>Impact AGF-3:</b> Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use	SU	>	=	=
<b>3.4 Air Quality</b>				
<b>Impact AQ-1:</b> Conflict with or obstruct implementation of the applicable air quality plan	LTS	>	=	=
<b>Impact AQ-2:</b> Result in a substantial net increase in construction-related emissions	SU	=	=	=
<b>Impact AQ-3:</b> Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or State ambient air quality standard	SU	>	<	<
<b>Impact AQ-4:</b> Expose sensitive receptors to substantial pollutant concentrations	SU	>	=	=

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>Impact AQ-5:</b> Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	LTS	=	=	=
<b>3.5 Biological Resources</b>				
<b>Impact BIO-1a:</b> Have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special status in local or regional plans, policies, or regulations, or by CDFW, USFWS, or NOAA Fisheries	SU	>	=	<
<b>Impact BIO-1b:</b> Have substantial adverse impacts on designated critical habitat for federally listed plant and wildlife species	LTS/M	>	=	<
<b>Impact BIO-2:</b> Have a substantial adverse effect on riparian habitat, State- or federally protected wetlands (including but not limited to marsh, vernal pool, coastal), or other sensitive natural communities identified in local or regional plans, policies, or regulations, or by CDFW or USFWS, through direct removal, filling, hydrological interruption, or other means.	LTS/M	<	=	=
<b>Impact BIO-3:</b> Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridor, or impede the use of native wildlife nursery sites	SU	<	<	<
<b>Impact BIO-4:</b> Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or with provisions of an adopted Habitat Conservation Plan (HCP); Natural Community Conservation Plan (NCCP); or other approved local, regional, or State HCP	LTS	>	=	<
<b>Impact BIO-5:</b> Have the potential to substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or substantially reduce the number or restrict the range of an endangered, rare, or threatened species	SU	>	=	<
<b>3.6 Climate Change, Greenhouse Gases, and Energy</b>				
<b>Impact GHG-1:</b> Result in a net increase in greenhouse gas emissions, either directly or indirectly, compared to existing 2015 conditions that may have a significant impact on the environment	SU	>	<	=
<b>Impact GHG-2:</b> Conflict with the Bay Area region's achievement of the GHG emissions reduction target of 19% below 2005 emissions by 2035 established by CARB pursuant to SB 375	LTS	>	=	=

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>Impact GHG-3:</b> Conflict with an applicable State plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	SU	>	=	=
<b>Impact GHG-4:</b> Conflict with an applicable local plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	>	=	=
<b>Impact EN-1:</b> Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	LTS	=	=	=
<b>Impact EN-2:</b> Conflict with or obstruct a State or local plan for renewable energy or energy efficiency	LTS	>	=	=
<b>3.7 Cultural Resources and Tribal Cultural Resources</b>				
<b>Impact CUL/TCR-1:</b> Cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5	SU	>	=	<
<b>Impact CUL/TCR-2:</b> Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5	SU	>	=	<
<b>Impact CUL/TCR-3:</b> Disturb any human remains, including those interred outside of formal cemeteries	LTS	>	=	<
<b>Impact CUL/TCR-4:</b> Cause a substantial adverse change in the significance of a TCR, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe	SU	>	=	<
<b>3.8 Geology, Seismicity, and Mineral Resources</b>				
<b>Impact GEO-1:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault	LTS	<	=	<
<b>Impact GEO-2:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking	LTS	>	<	<
<b>Impact GEO-3:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction, lateral spreading, and subsidence	LTS	<	<	<
<b>Impact GEO-4:</b> Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides	LTS	>	=	<

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>Impact GEO-5:</b> Result in substantial soil erosion or the loss of topsoil	LTS	>	=	<
<b>Impact GEO-6:</b> Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property	LTS	>	=	<
<b>Impact GEO-7:</b> Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature	SU	>	=	<
<b>Impact MR-1:</b> Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State or a locally-important mineral resources recovery site delineated on a local land use plan	LTS	>	=	<
<b>3.9 Hazards and Wildfire</b>				
<b>Impact HAZ-1:</b> Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	LTS	=	=	=
<b>Impact HAZ-2:</b> Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment	LTS	>	<	<
<b>Impact HAZ-3:</b> Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school	LTS	=	=	=
<b>Impact HAZ-4:</b> Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment	SU	=	=	=
<b>Impact HAZ-5:</b> Result in a safety hazard for people residing or working in the planning area for projects located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport	LTS	=	=	=
<b>Impact HAZ-6:</b> Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan	SU	<	=	=
<b>Impact HAZ-7:</b> Exacerbate the risk of wildland fires, associated pollutant release, and potential for flooding and landslides due to projected land use patterns and infrastructure in or near State Responsibility Areas or land classified as very high hazard severity zones	SU	>	<	<

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>3.10 Hydrology and Water Quality</b>				
<b>Impact HYDRO-1:</b> Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality	LTS	>	=	<
<b>Impact HYDRO-2:</b> Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin	LTS	>	=	<
<b>Impact HYDRO-3:</b> Substantially alter existing drainage patterns, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion, siltation, or additional sources of polluted runoff	LTS	>	=	<
<b>Impact HYDRO-4:</b> Substantially alter existing drainage patterns, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in runoff that exceeds capacity of existing or planned stormwater drainage systems or results in flooding on- or off-site	LTS	>	=	<
<b>Impact HYDRO-5:</b> Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows	LTS	>	>	=
<b>Impact HYDRO-6:</b> In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation	LTS	>	=	=
<b>3.11 Land Use, Population, and Housing</b>				
<b>Impact LU-1:</b> Physically divide an established community	SU	<	<	=
<b>Impact LU-2:</b> Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	LTS	=	=	=
<b>Impact LU-3:</b> Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)	LTS	=	=	=
<b>Impact LU-4:</b> Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere	SU	<	=	>

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>3.12 Noise</b>				
<b>Impact NOISE-1:</b> Generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	SU	=	=	=
<b>Impact NOISE-2:</b> Generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies	SU	=	=	=
<b>Impact NOISE-3:</b> Generate excessive groundborne vibration or groundborne noise levels	SU	=	=	=
<b>Impact NOISE-4:</b> For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels	SU	=	=	=
<b>3.13 Public Services and Recreation</b>				
<b>Impact PSR-1:</b> in substantial adverse physical impacts associated with the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection, police protection, schools, parks, and other public facilities.	SU	=	=	=
<b>Impact PSR-2:</b> Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated or include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment	SU	=	=	=
<b>3.14 Public Utilities and Facilities</b>				
<b>Impact PUF-1:</b> 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	SU	>	=	<
<b>Impact PUF-2:</b> Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years	SU	>	=	<

Impacts	Proposed Plan	No Project Alternative	No New Highway Capacity and Transit Reinvestment Alternative	TOC Growth Focus Alternative
<b>Impact PUF-3:</b> 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	SU	=	=	=
<b>Impact PUF-4:</b> 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	SU	=	=	=

**3.15 Transportation**

<b>Impact TRA-1:</b> Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	LTS	=	=	=
<b>Impact TRA-2:</b> Conflict or be inconsistent with CEQA Guidelines Section 15064.3(b)	SU	>	=	=
<b>Impact TRA-3:</b> Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	LTS	=	=	=
<b>Impact TRA-4:</b> Result in inadequate emergency access	LTS	=	=	=

Notes: LTS=less than significant  
LTS/M=less than significant with mitigation incorporated  
SU=significant and unavoidable  
<=the alternative would result in less impact than the proposed plan  
>= the alternative would result in greater impact than the proposed plan  
= the alternative would result in a similar impact to the proposed plan

# Marin Independent Journal

## Marin Voice: Plan Bay Area's draft report is built on false narrative

By [SUSAN KIRSCH](#)

November 9, 2025

<https://www.marinij.com/2025/11/09/marin-voice-plan-bay-areas-draft-report-is-built-on-false-narrative/>

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?

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.

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.

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).*



## Guidelines for Submitting Comments on a *Program EIR*

### 1. Know What a Program EIR Is

- A **broad, regional, policy-level** environmental review (e.g., long-range plans, regional transportation or land-use plans).
- Focus is on **framework-level impacts** and **program-wide policies**, not project-level details.

### 2. Focus Your Comments on CEQA-Relevant Issues: CEQA requires agencies to respond to **substantial evidence-based** comments. Strong comment types include:

- **Inadequate analysis** (missing baseline data, outdated data, unsupported assumptions).
- **Understated impacts** (transportation, housing displacement, cumulative impacts).
- **Inadequate alternatives** (failure to analyze reasonable, feasible options).
- **Insufficient mitigation measures** (too general, unenforceable, deferred, or ineffective).
- **Internal inconsistencies** between chapters, tables, or the planning document.

### 3. Cite Where the Issue Appears - MTC must respond to **specific** comments.

Use chapter, section, or table references:

- “DEIR, Chapter 3.2, p. 3.2-17 overstates...”
- “Table 4-5 does not align with assumptions in Chapter 2...”

### 4. Use Evidence. Strengthen your comment by including:

- Factual data (from public agencies, peer-reviewed sources, regional reports).
- Logical connections demonstrating **why** the analysis is incomplete or flawed.
- Examples of better methodologies used in comparable Program EIRs.

### 5. Make Clear What Should Change: The Governing Board should direct staff to:

- Use updated data
- Reanalyze a section
- Add a missing alternative
- Strengthen or revise mitigation
- Clarify inconsistencies

### 6. Raise Issues NOW: Program EIRs tier into future project-level reviews. Commenting now preserves your ability to challenge deficiencies later.

### 7. Be Professional, Specific, and Organized

- Use headings (e.g., **Transportation Impacts, GHG Assumptions, Housing Analysis**).
- Number your comments.
- Keep each point focused.

### 8. Submit Before the Deadline (December 18, 2025 at 5 pm)

- Include your name, affiliation (optional), and contact details.
- Request confirmation of receipt.

# REQUIREMENTS FOR USE OF DRU STATISTICS

California law **requires** cities and counties to use population statistics from the Department of Finance's (DOF) **Demographic Research Unit (DRU)** for specific purposes, primarily related to the **Gann Initiative appropriations limit** (Article XIII B of the State Constitution) and the allocation of certain state funds.

## Key Legal Requirements

- **Appropriations Limit (Gann Initiative):** The California Constitution, specifically Article XIII B (the Gann Initiative), mandates a limit on state and local government spending. To calculate this annual appropriations limit, local jurisdictions (cities and counties) are required to use population change data certified by the DOF. The DOF's DRU is the entity responsible for producing and certifying these official population estimates.
- **Revenue Allocation:** California Revenue and Taxation Code section 11005.6 mandates the DOF to automatically certify population estimates that exceed the current certified population to the State Controller's Office. These certified figures are used for the allocation of certain state revenues to cities and counties.
- **Housing Unit Estimates:** The DOF is also mandated to collect housing unit data annually from every city and county. This data is a basis for the housing unit method used to produce official population estimates.

## Role of the Demographic Research Unit (DRU)

The DRU is the official source of demographic data for the State of California, producing population estimates and projections that state and local agencies are required to use for various planning and reporting purposes. These include:

- Annual city and county population estimates.
- Population projections with components of change (births, deaths, migration).
- Public school enrollment projections.

The use of this standardized, official data ensures consistency across different government entities within the state. For specific details on current data and methodology, you can visit the [California Department of Finance Demographics page](#).