



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
3.2 Aesthetics and Visual Resources				
Impact AES-1: Have a substantial adverse effect on a scenic vista	SU	>	=	<
Impact AES-2: Substantially damage scenic resources, including but not limited to trees, rock outcropping, and historical buildings within a state scenic highway	SU	>	=	<
Impact AES-3: 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	>	=	<
Impact AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	SU	>	=	<
3.3 Agriculture and Forestry Resources				
Impact AGF-1: 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	>	=	>
Impact AGF-2: 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	>	=	<
Impact AGF-3: 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	>	=	=
3.4 Air Quality				
Impact AQ-1: Conflict with or obstruct implementation of the applicable air quality plan	LTS	>	=	=
Impact AQ-2: Result in a substantial net increase in construction-related emissions	SU	=	=	=
Impact AQ-3: 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	>	<	<
Impact AQ-4: 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
Impact AQ-5: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	LTS	=	=	=
3.5 Biological Resources				
Impact BIO-1a: 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	>	=	<
Impact BIO-1b: Have substantial adverse impacts on designated critical habitat for federally listed plant and wildlife species	LTS/M	>	=	<
Impact BIO-2: 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	<	=	=
Impact BIO-3: 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	<	<	<
Impact BIO-4: 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	>	=	<
Impact BIO-5: 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	>	=	<
3.6 Climate Change, Greenhouse Gases, and Energy				
Impact GHG-1: 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	>	<	=
Impact GHG-2: 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
Impact GHG-3: Conflict with an applicable State plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	SU	>	=	=
Impact GHG-4: Conflict with an applicable local plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	>	=	=
Impact EN-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation	LTS	=	=	=
Impact EN-2: Conflict with or obstruct a State or local plan for renewable energy or energy efficiency	LTS	>	=	=
3.7 Cultural Resources and Tribal Cultural Resources				
Impact CUL/TCR-1: Cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5	SU	>	=	<
Impact CUL/TCR-2: Cause a substantial adverse change in the significance of a unique archaeological resource as defined in Guidelines Section 15064.5	SU	>	=	<
Impact CUL/TCR-3: Disturb any human remains, including those interred outside of formal cemeteries	LTS	>	=	<
Impact CUL/TCR-4: 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	>	=	<
3.8 Geology, Seismicity, and Mineral Resources				
Impact GEO-1: 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	<	=	<
Impact GEO-2: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking	LTS	>	<	<
Impact GEO-3: 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	<	<	<
Impact GEO-4: 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
Impact GEO-5: Result in substantial soil erosion or the loss of topsoil	LTS	>	=	<
Impact GEO-6: 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	>	=	<
Impact GEO-7: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature	SU	>	=	<
Impact MR-1: 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	>	=	<
3.9 Hazards and Wildfire				
Impact HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	LTS	=	=	=
Impact HAZ-2: 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	>	<	<
Impact HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school	LTS	=	=	=
Impact HAZ-4: 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	=	=	=
Impact HAZ-5: 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	=	=	=
Impact HAZ-6: Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan	SU	<	=	=
Impact HAZ-7: 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
3.10 Hydrology and Water Quality				
Impact HYDRO-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality	LTS	>	=	<
Impact HYDRO-2: Substantially decrease groundwater supplies or interfere with groundwater recharge such that the project may impede sustainable groundwater management of the basin	LTS	>	=	<
Impact HYDRO-3: 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	>	=	<
Impact HYDRO-4: 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	>	=	<
Impact HYDRO-5: 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	>	>	=
Impact HYDRO-6: In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation	LTS	>	=	=
3.11 Land Use, Population, and Housing				
Impact LU-1: Physically divide an established community	SU	<	<	=
Impact LU-2: 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	=	=	=
Impact LU-3: 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	=	=	=
Impact LU-4: 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
3.12 Noise				
Impact NOISE-1: 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	=	=	=
Impact NOISE-2: 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	=	=	=
Impact NOISE-3: Generate excessive groundborne vibration or groundborne noise levels	SU	=	=	=
Impact NOISE-4: 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	=	=	=
3.13 Public Services and Recreation				
Impact PSR-1: 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	=	=	=
Impact PSR-2: 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	=	=	=
3.14 Public Utilities and Facilities				
Impact PUF-1: 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	>	=	<
Impact PUF-2: 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
Impact PUF-3: 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	=	=	=
Impact PUF-4: 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

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