

California Department of Transportation

DISTRICT 4
DIVISION OF TRANSPORTATION PLANNING AND LOCAL ASSISTANCE
111 GRAND AVE, MS-10D | OAKLAND, CA 94612
(510) 715-8654 | TTY 711
www.dot.ca.gov



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Dave Vautin
Regional Planning Program Director
Metropolitan Transportation Commission
375 Beale Street, Suite 800
San Francisco, CA 94105

Re: Draft Environmental Impact Report (DEIR), Draft Plan Bay Area (PBA) 2050+ (Plan) and associated Draft Supplemental Reports

Dear Dave Vautin:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the DEIR, Draft PBA 2050+, and associated draft supplemental reports. Caltrans remains committed to identifying and appropriately mitigating potential impacts to the State's multimodal transportation system and natural environment, in support of a safe, sustainable, equitable, integrated, and efficient transportation network.

Caltrans commends the Metropolitan Transportation Commission (MTC)/Association of Bay Area Governments (ABAG) for thoughtfully incorporating Caltrans comments and recommendations, made to the Notice of Preparation (NOP), into the DEIR and Draft PBA 2050+. We also appreciate the efforts to engage stakeholders and partners through workshops that support early and ongoing coordination. Caltrans continues to encourage MTC/ABAG to align the Plan with the goals and objectives outlined in State Plans referenced in the NOP, including the California Transportation Plan 2050 ([link](#)).

The following comments are based on our review of the December 2025 DEIR, Draft PBA 2050+, and associated draft supplemental reports. Comments to the 2025 DEIR and Draft PBA 2050+ are contained in this letter, and comments to the associated draft supplemental reports are provided as an Attachment.

DEIR Comments

Travel Demand Analysis

- Mitigation Measure TRA-2(a) states that MTC will collaborate with State and other agencies to explore the feasibility of new programs for reducing vehicle miles travelled (VMT), such as VMT fees, banks, and exchanges. Please note that Caltrans has funded several local/regional agencies to study the feasibility of a variety of VMT mitigation programs through the Sustainable Transportation Planning Grant program ([link](#)). Caltrans welcomes opportunities to work with MTC in this effort.
- With respect to Transportation Element T7- Expand Freeways and Mitigate Impacts, please note that the Climate Action Plan for Transportation Infrastructure (CAPTI) guiding principles include promoting projects that do not significantly increase passenger vehicle travel ([link](#)). As stated in Caltrans' letter in response to the PBA 2050+ NOP (dated February 13, 2025), it is worth reiterating that State policy encourages sustainable transportation alternatives to highway capacity expansion that will reduce VMT and Greenhouse Gas (GHG) emissions.

Climate Change

- **Pages 3.6-30 – Regional and Local agencies:** Please consider adding a resource link that highlights completed Greenhouse Gas and Climate Action Planning (CAP) studies - such as the California Air Resources Board (CARB) CAP Viewer ([link](#)).

Tribal Coordination

Please consider enhancing efforts to coordinate with local Tribal Nations, including opportunities for early, sustained, and government-to-government coordination with Tribes. Some improvement recommendations for consideration:

- Expand Documentation of Consultation Efforts: provide a detailed summary of outreach conducted under Assembly Bill (AB) 52, including follow-up correspondence, meeting invitations, and the status of any ongoing consultations.
- Clarify Consultation Outcomes and Influence on the Analysis: summarize input received from responding Tribes and describe how feedback informed the environmental analysis, mitigation measures, or project approach.
- Commit to Ongoing Government-to-Government Engagement: include language affirming continued coordination with Tribes throughout regional planning processes and subsequent project-level California Environmental Quality Act (CEQA) reviews, design, and construction phases.

- Enhance Mitigation Measures: strengthen Mitigation Measure CUL/TCR-4 by incorporating culturally appropriate practices, such as tribal cultural monitoring, co-developed inadvertent discovery protocols, and avoidance or preservation in place where feasible.
- Adopt a Collaborative and Respectful Tone: revise language to reflect a relationship-based approach that acknowledges Tribal sovereignty, cultural sensitivity and confidentiality, consistent with Public Resources Code (PRC) Section 21082.3(c).
- Genuine Relationship Building: establish regular communication with Tribal representatives, such as quarterly meetings to maintain trust and ensure consistent dialogue.
- Broaden Outreach Methods: make multiple outreach attempts through various communication channels – including scheduled visits to Tribal offices, follow-up calls, and invitations to coordination meetings – to ensure inclusive and good faith engagement.

Draft PBA 2050+ Comments

Page 3 – Regional Conditions in 2025

- Please consider updating the information to more accurately reflect current commute behaviors and their implications for regional transportation demand. While 2023 data provide an earlier baseline, work-from-home and hybrid work patterns have continued to evolve through 2025, as public and private sector employers have adjusted their operational and workplace policies.
- Given that transit frequency is a key factor in mode choice, please clarify whether remote work is forecast to remain at approximately 23% or return to pre-2015 levels of approximately 11%.

Pages 26-27 – Connected

- Please provide additional details to help readers understand both commute and non-commute transit patterns. Expanded information to these travel behaviors would support a more complete interpretation of regional transportation demand and the factors influencing transit and use across different trip purposes.

Page 30 – Healthy

- Please add citations in the footnote for the following statements:
 - “5/100 – the region has lost 5 homes to...over the past decades”
 - “60% of the region's shoreline...preliminary planning.”

Providing the data sources will improve transparency and allow readers to verify and better understand the underlying research.

Page 32 – Vibrant

- Please add a citation for the claim that Bay Area workers spend, “80+ hours per week,” on referenced activity. This will ensure clarity and traceability of the data.

Page 38 – From Planning to Reality: Looking Back at Progress in Regional Investments

- In the third paragraph, please update the last sentence to, “Coordination across transportation, land use, and the environment will be essential to reaching regional sustainability and mobility goals through 2050 and beyond.”

Page 40 – Notable Transportation and Land Use Projects, Downtown Santa Rosa

- Please revise the reference to the Tubbs Fire, as it is not directly related to Downtown Santa Rosa. Instead, focus on the investments associated with the SMART rail extension, which is more relevant to the area. The current description incorrectly suggests that the Tubbs Fire directly affected the downtown area.

Page 58 – External Forces: Factors Beyond Government Control- Sea level Rise (SLR)

- Please explain why 4.9 feet was selected as the sea level rise (SLR) protection level, including references to scientific guidance, modeling assumptions, and planning horizons used to determine this threshold.
- Please clarify why PBA 2050+ also assumes 2 feet of permanent SLR by 2050. The San Francisco Bay Conservation and Development Commission (BCDC) Regional Shoreline Adaptation Plan guidance recommends evaluating 0.8 feet (based on the Ocean Protection Council's [OPC] intermediate projection), while OPCs highest projection is 1.2 feet by 2050.
- If the assumption is based on the Coastal Storm Modeling System data, please provide a citation given the availability of other datasets and projection ranges.

Page 73 – The Future of Freeways: The Next Generation Bay Area Freeways Study

- Please revise this section to note that MTC will evaluate two potential pathways, along with the, “dual express lanes,” option proposed by Caltrans. All three approaches will be assessed and documented in the forthcoming Next Generation Bay Area Freeways Study report.
- Please also explain the potential impact of this project on the existing Express Lane system and associated toll revenues. Additionally, clarify whether the proposed freeway tolling would be integrated with the current Express Lanes or serve as a replacement.

Page 90 – Environment Element- Theme: Reduce risks from hazards

- Please explain why 4.9 feet was selected as the SLR protection level, including references to scientific guidance, modeling assumptions, and planning horizons used to determine this threshold.

Page 107 - Improving Connected Outcomes

- Please explain how PBA 2050+ would improve first-mile/last-mile connections for people walking or biking to and from transit stations. Additional details on specific strategies, investments, or programs would help clarify how these improvements will be implemented and supported.

Page 121 - Transportation Element Implementation Actions

- Please include active transportation as one of the primary focus areas. Evaluating active transportation within the implementation actions would emphasize the importance of improving safety, connectivity, and accessibility for people walking and biking. This would also align with regional goals related to mode shift, climate resilience, and equitable mobility.

We appreciate MTC/ABAG's continued collaboration and dedication through the Plan's development process. The efforts reflected in the Plan will provide valuable guidance and foster continued collaboration between Caltrans, MTC/ ABAG, other partner agencies as we align federal, State, and regional priorities to support the Bay Area's future mobility, climate adaptation, and economic needs.

Thank you again for the opportunity to review the PBA 2050+ DEIR, Draft Plan and associated draft supplemental reports. Should you have any questions regarding this letter, please contact Erik Alm at (510) 715-8654 or erik.alm@dot.ca.gov.

Sincerely,



CAMERON OAKES
Deputy District Director

Attachment

c: State Clearinghouse

ATTACHMENT

Regional Transportation Plan (RTP) Checklist Comments

General Comments:

Caltrans commends MTC/ABAG for the following:

- Clear formatting, visual layout, and overall readability of PBA 2050+. The use of graphics, consistent typography, and a concise narrative structure enhances accessibility and supports broader public engagement.
- Depth of the Plan, which goes beyond the 20-year horizon requirement by providing a comprehensive and technically rigorous update to the Bay Area's long-range plan.
- Commitment to transparent processes, robust analysis, and meaningful engagement with local jurisdictions, regional partners, and the public -- reflecting a strong understanding of the Bay Area's evolving needs and priorities
- Thoughtful integration of housing, transportation, economic, and environmental strategies that advance shared goals for equity, sustainability, and long-term resilience.

Consultation/Cooperation:

- **6. Did the RTP include a comparison with the California State Wildlife Action Plan and (if available) inventories of natural and historic resources? (23 CFR 450.324(g)(1&2)):**

The maps provided in the *Statutorily Required Plan Maps* (pg. 7-28) do not appear to show a comparison with the State Wildlife Action Plan (SWAP).

Please provide additional context on how these maps incorporate the SWAP.

Modal Discussion:

- **1. Does the RTP discuss intermodal and connectivity issues:**

Please ensure that the Plan documents include a discussion on connectivity issues. We are unable to locate this topic, particularly within the designated pages referenced in the checklist.

- **7. Does the RTP address the California Coastal Trail? (Government Code 65080.1) (For MPOs located along the coast only):**

Please ensure that the Plan documents include robust discussion of the California Coastal Trail. We are unable to locate this topic, especially within the designated pages referenced in the checklist.

Financial:

- **2. Does the RTP contain a consistency statement between the first 4 years of the fund estimate and the 4-year STIP fund estimate? (65080(b)(4)(A)):**
Please ensure that the final Plan documents include robust discussion on the consistency between the first four years of the fund estimate and the four-year State Transportation Improvement Program estimate. We are unable to locate this topic, particularly within the designated pages referenced in the checklist.

Transportation Project List Comments

State Route 37

As noted in our Draft Transportation Project List comment letter dated November 15, 2024, two State Route (SR) 37 projects, both related to long-term sea level rise adaptation, are still missing from the final Transportation Project List and should be added. While the SR 37 long-term sea level rise adaptation project was included in the November 2024 amended project list, it is not reflected in the final list. The missing projects are:

- **SR 37 Flood Reduction Phase 2- Long term Causeway between US 101 and Atherton Avenue:**
Opening period: 2050
Location: Marin County
Capital Cost (YOE, millions): \$1,700
- **SR 37 Long-term Sea-Level Rise Resilient Causeway between US 101 and I-80:**
Opening period: 2050
Location: Marin, Sonoma, Napa, and Solano Counties
Capital Cost (YOE, millions): \$6,300-\$11,100

We respectfully request that these projects be incorporated into the final Transportation Project List to ensure consistency with the amended project list and to reflect the region's long-term climate resilience priorities.

Page 5 – Airport Plans

- Please correct the name to “Charles M. Schulz Sonoma County Airport” (the “M” is currently missing).

Page 10 – T7 – Expand Freeways and Mitigate Impacts

- Please explain the potential impact of substantially scaling back investment in this strategy on transit connectivity, particularly in areas where managed lanes do not currently exist.

Page 27 – T9. Build a Complete Streets Network

- Please consider adding Bike Highway (which is defined in the Caltrans Bay Area Bike Highway Study ([link](#)) as a category of investment in this section.

25-T05-015 Congestion Pricing & Mobility Improvements | Treasure Island

- Please indicate whether the proposed express Alameda-Contra Costa Transit District bus service to Oakland would connect to Bay Area Rapid Transit.

25-T06-050 Interchange Improvements | US 101 | Holly Street

- Please clarify whether “eastbound” refers to Holly Street or another roadway.

25-T07-077 Express Lanes | New Lane | US-101 | Between I-380 and the San Francisco County Line

- Please revise the reference to “New Lane” and replace it with the term “Managed Lane.” This is because a determination has not yet been made that the project will involve a new lane.

25-T11-150 Ferry and Express Bus | Service Expansion | GGT

- Please add Contra Costa County in the project location since El Cerrito is a service location.

25-T11-153 Local Bus and Light Rail | Service Frequency Upgrades | SFMTA | Systemwide (“Muni Forward”)

- Please clarify that “routes” refers to bus routes to avoid confusion with State Routes.

25-T11-154 Local Bus | Service Expansion | SFMTA | Southeast San Francisco

- Please clarify that “routes” refers to bus routes to avoid confusion with State Routes.

25-T11-155 Rapid Bus | Modernization | SFMTA | Geneva Ave/Harney Way

- Please clarify that “routes” refers to bus routes to avoid confusion with State Routes.

25-T12-182 Rail | Service Expansion | SMART | Cloverdale

- Please update the project scope to include a new station in Geyserville, in addition to Cloverdale.

25-EN1-183 Sea Level Rise Adaptation Infrastructure | Regional

- The Scope for Strategy EN1 does not match with the description provided in Attachment E. Please revise for consistency and clarify whether this strategy is intended to address 2 feet of inundation by 2050 (as the Ocean Protection Council projects 0.8 feet by 2050) or 4.9 feet by 2100.

Resilience Project List Comments

Coastal Resilience Projects

- Please ensure that the, "Gleason Beach realignment and the Pescadero Minor Realignment," projects are included in the Resilience Project List. These projects are critical for coastal resilience, community, and long-term adaptation to erosion and sea-level rise. Their omission may result in an incomplete representation of regional resilience priorities and ongoing interagency coordination. We request the verification and, if necessary, the addition of these projects to the Resilience Project List.

811000 Manzanita Sea Level Rise

- Please revise the project title to, "101/1/Manzanita to Donahue Sea Level Rise."

817000 Surfers Beach

- Please update the project cost to \$18 million. While the initial estimate was \$5 million, Caltrans has not yet developed a full suite of cost estimates or selected specific alternatives. Based on current understanding, \$18 million is a more reasonable projection at this time.

Draft Transit 2050+ Report Comments

Page 1– Why Was Transit 2050+ Developed? and Page 8 – The Bay Area's Transit Network Faces Both Old and New Challenges

- Please consider noting that declining ridership is not the only structural challenge facing the transit system. Rising operational costs - driven by inflation – as well as decreasing gas tax revenues due to the growing adoption of electric and fuel-efficient vehicles, are also significant and compounding issues.

Page 2-3 – How Will Implementation of Transit 2050+ Benefit the Bay Area?

- Please emphasize that the most efficient way to move people across the Bay Area in congested areas is by reducing reliance on single-occupancy vehicles.

Page 10 – How is Transit 2050+ different from other state and regional transit plans and policies?

- Please remove the '(Draft 2025)' reference from the second bullet point citing the Caltrans Bay Area Transit Plan, as the plan is now final and published. Additionally, please consider adding the website (*link*) to the final Caltrans District 4 Transit Plan.
- Please consider using the term, "State Transportation Network (STN)," instead of "State Highway System (SHS)," consistent with terminology used in in Caltrans District 4.

Page 20 – Table 1: Transit 2050+ Goals and desired outcomes, page 39 – invests in regional programs that Advance Network Integration and Improve Accessibility, page 66 – Fewer Barriers to Using Transit, and page 69 – Key Partners

- Please prioritize and incorporate transit access facilities such as pedestrian and bicycle infrastructure, seating, shading, and other bus stop amenities into the Transit 2025+ Goals, as these remain significant barriers to accessing and using transit.

Page 105 – 3.1 Transit Conditions

- Please update the reference to, "Amtrak San Joaquins Train," to reflect its rebranding as the "Gold Runner" as of November 3, 2025.

Page 166 – Fisherman's Wharf - Richmond District

- Please include the part-time transit lane pilot from Van Ness to Lyon Street for completeness.

Page 197–Table 3: Transit 2050+ Goals

- Please review the formatting of the bullets under Goal 1 (A–D), as they appear misaligned. It may be clearer to format "A" as the main header with sub-bullets labeled a–d or i–iv.

Page 206-210 – O&D Commute Time Tables

- Please clarify whether Peninsula to San Francisco or San Francisco to Peninsula routes will be identified, and if both directions are included.

Draft Performance Report Comments

Page 122 – Infrastructure Condition

- Please consider placing the State Highway Operation and Protection Program – Bridge Rehabilitation and Reconstruction and the Local Highway Bridge Programs in separate lists to enhance clarity and distinguish between State and local bridge efforts.

Page 123 – System Reliability, Freight Movement and Economic Vitality

- Please separate the projects that contribute to system reliability, freight movement, and economic vitality within the Transportation Improvement Program list. The current presentation reflects a mix of funding programs and project types, which may make a specific contribution of each project to these distinct goals.

Page 124 – Congestion Reduction

- Please consider referencing the Comprehensive Multimodal Corridor Plans in this section and linking them to the Solutions for Congested Corridors Program under Senate Bill 1. This connection would help illustrate how corridor-level planning supports congestion reduction strategies.

Draft Implementation Plan Report Comments

Action 3 - Identify and pursue other diverse funding sources to accelerate transportation system enhancements

- Please include a reference for maintaining support for existing funding sources. While this may be implied, other actions explicitly mention maintaining support, so doing the same here would ensure consistency.
- Please clarify whether this action could include VMT mitigation banks or exchanges, which may fund a range of projects including, but not limited to, transit.
- Please clarify what is meant by re-evaluating the match requirements for existing grant programs. Does this refer to reducing local burdens, increasing flexibility, or other changes?

Action 6 - Deliver projects and advocate for policies that sustain and improve the operation, efficiency, effectiveness and customer experience of the Bay Area's transportation system

- The Transportation strategy includes two examples referencing SR 37 toll lanes, once in Action 4 and again in Action 6. For Action 6, it is recommended to also include an example of Express Lanes to provide broader regional context.

Action 18 - Monitor statewide changes to road pricing and freeway modernization policy and complete a second-stage Next Generation Bay Area Freeways planning study

- Please consider incorporating, "continued study of multimodal needs for implementation and affordability impact mitigation," in the sentence, "Co-lead a Next Generation Freeways second-stage planning study to inform a preferred pricing pathway for the region with state and/or local partners that is focused on corridor-scale analysis of traffic diversion and affordability impact mitigation, informing policymaker decisions on a regional road pricing pathway".

Action 20 - Update how MTC works with partners to manage congestion, including by reviewing the approach to future Express Lanes and how they operate within a changing regulatory context

- Please assess whether, "manage congestion," should be revised to, "reduce VMT," to better align with State climate goals.

Action 21 - Facilitate regional knowledge-sharing and training on Active Transportation and Vision Zero initiatives

- In reference to Caltrans Director's Policy (DP) 37 (Complete Streets), consider adding language to reflect its goal of supporting State objectives and promoting walking, biking, transit, and passenger rail.
- To ensure consistency, align wording with DP-37 and consider citing the Caltrans District 4 Bike and Pedestrian Plans.

Action 22 - Improve street safety and expand active transportation through a package of technical assistance offerings

- In reference to Caltrans DP-37 (Complete Streets), consider adding language to reflect its goal of supporting State objectives and promoting walking, biking, transit, and passenger rail.
- Please clarify whether technical assistance to partners would include support of guidance for Quick-Build Complete Streets projects.
- It would be helpful to provide more details on the types of training and funding support that MTC/ABAG would offer.

Action 46 - Defend climate action and adaptation policies and existing funding programs

- Please consider including support for clean energy standards as part of this action.

Action 47 - Track and coordinate electrification working groups to address common grid barriers

- Please clarify whether “EV” refers to both on-road and off-road vehicles, including marine electrification and the use of hydrogen-powered vehicles.

Action 48 - Enhance BayREN's building energy programs for residential and commercial renters and property owners, including local governments, with a focus on health and resilience.

- Please include a reference to supporting clean energy in the third bullet point.

Action 49 - Expand planning, funding, and project delivery technical assistance for sea level rise adaptation and Action 50 - Support BCDC in advancing efforts to strategically plan for and fund climate adaptation

- Please consider adding Caltrans and the California Coastal Commission as partners in assessing and documenting funding needs.

Action 52 - Pilot methods to accelerate conservation and transportation project delivery.

- Please add a bullet point emphasizing the importance of early engagement to bring agencies together and align shared objectives. Mitigation efforts often require coordination across multiple agencies, and misaligned goals can result in significant delays.

Action 53 - Help local governments advance conservation, trails integration, and green infrastructure

- Please coordinate with Caltrans' Wildlife Connectivity and Habitat Conservation Program, as well as the District 4 Office of Biological Sciences & Permits, to integrate wildlife crossing opportunities into priority corridors (e.g., SR 37, Interstate (I) 580, I-680, I-280).

Draft Technical Assumption Report Comments

Page 13 – Road Pricing Revenue

- Please clarify or reconcile the discrepancy between the Next Generation Bay Area Freeways Study which indicates that fees begin at 5 cents under the regional mileage-based user fee scenario, and this section, which states a range of 10–30 cents.

Draft Forecasting and Modeling Report Comments

Validation Targets for Existing-Year Model Outputs

- Please describe the validation targets based on the checklist developed by MTC that were used to validate:
 - Existing-year model trip tables
 - Mode choice splits by trip purpose
 - Final assignment peak-period and daily volumes.
- Caltrans understands that, because the MTC model is an activity-based model, different types of matrices may require different validation targets. However, there should still be defined targets and tolerable limits that demonstrate the model's reasonableness and provide confidence before proceeding to four-year forecasting of traffic volumes and VMT.

Comparison of PBA 2050+ to PBA 2050

- Please provide a tabular comparison of PBA 2050 to PBA 2050+ for existing and future years, by county, including:
 - Total land use
 - Total productions and attractions
 - Trip tables by trip purpose
 - Vehicular volumes at key gateways (e.g., Altamont Pass on the eastern fringe of Alameda County)
 - Volumes on all Bay Area toll bridges
 - Volumes by facility type (freeways, expressways, principal/ major/ minor arterials)
- Please provide a comparison of VMT between PBA 2050 and PBA 2050+, similar to the comparison described above, by county for both existing and future years.

Model Version Documentation

- Please include a short list of changes from Travel Model (TM) version 1.5 to 1.6 within the report body, rather than only providing a weblink in the footnote. This will improve transparency and accessibility for reviewers.

Transit Ridership by Region

- Please show how transit ridership simulated by the model differs by region with the Bay Area. Consider presenting this information graphically (e.g., maps or bar charts) to enhance clarity and interpretation.

Missing Figure 19

- Please include Figure 19, which is currently missing from the report.

Draft Equity Analysis Report Comments

Page 5-7 – What is Equity?

- Please clarify whether Equity Priority Communities (EPCs) were engaged through formats that they themselves identified as accessible and effective. If EPCs have previously communicated their preferred methods of engagement, please indicate whether these preferences were incorporated into MTC's Public Engagement Strategy. If this information is available, consider referencing it in the introduction section to demonstrate responsiveness and an inclusive planning process.

Page 63 – Findings

- Please consider explicitly acknowledging how past transportation and land-use decisions have contributed to existing disparities. While the report references, "historically marginalized groups," it does not address the specific policies or decisions that have negatively impacted these communities. Including this context would enhance transparency, demonstrate accountability, and help build greater public trust in MTC/ABAG equity efforts.

Page 66 – Housing and Transportation Affordability: Share of Income Spent on Housing + Transportation

- On figure 22, please include a citation for the key data point on reducing household transportation costs, as it is currently missing. Providing a source will strengthen the credibility of the analysis and support further policy discussions.

Draft Native American Tribal Outreach Report Comments

Please ensure that MTC's consultation and engagement efforts are aligned with meaningful, respectful, and sincere practices that reflect the spirit and intent of applicable federal and state laws, including I23 U.S.C 134 (i)(6), 23 CFR 450.316, 23 CFR 450.326(b), 49 U.S.C 5303, 23 CFR 450.314, California laws AB 52, AB 923, and SB 18. While the document meets the procedural requirements of AB 52, it lacks evidence of meaningful Tribal coordination or consultation. Outreach appears limited to sending notification letters, with no follow-up or record of dialogue.

Page 6 – Table 1. Federally Recognized Tribes

- Please update the name of Lower Lake Rancheria Koi Nation to its current name, "*Koi Nation of Northern California*". Updating the table will ensure consistency with federal listings and Tribal preference.

Page 7 – Table 2: California Native American Tribes Traditionally – and / or Culturally-affiliated with the San Francisco Bay Area

- Per the Native American Heritage Commission (NAHC) List, the following tribes have ancestral territory within Caltrans District 4 and should be accurately reflected in relevant planning and consultation efforts:
 - Chicken Ranch Rancheria Me-Wuk Indians of California
 - Nashville Enterprise Miwok-Maidu-Nishinam Tribe
 - Rumsen Am:a Tur:ataj Ohlone
 - Tamien Nation
 - Tule River Indian Tribe
 - Wuksache Indian Tribe/Eshom Valley Band.
- Please also update the naming convention for the following tribes to reflect their full and proper names:
 - Guidiville Indian Rancheria
 - Kletsel Dehe Wintun Nation of the Cortina Rancheria
 - Northern Valley Yokuts Tribe

Updating these tables will ensure consistency with NAHC listings and tribal preferences.

Page 8 – Round 1 (2023): Planning for the future

- Please consider expanding the engagement process by incorporating more proactive outreach efforts, especially given the limited number of initial consultation requests. Increasing the frequency and variety of outreach methods may improve Tribal participation and ensure that the consultation opportunities are communicated effectively.

- Relying primarily on initial notification may not be sufficient to ensure meaningful engagement, especially given varied Tribal capacities, staffing, and communication preferences. More frequent and diverse outreach such as follow up emails, phone calls, virtual meetings, or in-person visits can help ensure that consultation opportunities are communicated and accessible. The approach aligns with best practices for government-to-government engagement and support stronger, more inclusive participation.

Page 11 – Round 3 (Spring 2025): Implementation Plan Partner Engagement

- The current phrasing, “staff again extended the opportunity for consultation... going above and beyond the requirements of AB 52 to notify Tribes only once,” may unintentionally imply that consultation is a discretionary favor rather than a statutory responsibility. Please consider rephrasing. In government-to-government communications, it is essential to maintain neutral, respectful language that recognizes Tribes as sovereign entities with legally established consultation rights. A more appropriate approach would be to state that staff provided multiple opportunities for consultation in accordance with PRC Section 21080.3.1, without framing it as going, “above and beyond.”

Pages 15-23 – Exhibit 2, 3, 4, and 5: Tribal Correspondence

- The letters in these exhibits use a formal, agency-focused tone that may inadvertently place less attention on the Tribe's perspective. While they clearly outline MTC/ABAG's efforts, they could be enhanced by weaving in more relational and people-centered language that acknowledges Tribal sovereignty, priorities, and community needs, and helping to support continued respectful dialogue.
- Revise Exhibit 4 to not only explain the planning document but also highlight potential areas of Tribal concern. Consider simplifying what appears to be overly legalistic language to make the letter more accessible.