# San Francisco Bay Conservation and Development Commission

375 Beale Street, Suite 510, San Francisco, California 94105 tel 415 352 3600

State of California | Gavin Newsom – Governor | info@bcdc.ca.gov | www.bcdc.ca.gov


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**TO:** Commissioners and Alternates


**FROM:** Larry Goldzband, Executive Director (415-352-3653; larry.goldzband@bcdc.ca.gov)
Todd Hallenbeck, GIS Specialist Lead (415-352-3667; todd.hallenbeck@bcdc.ca.gov)


**SUBJECT**: **Staff Report and Preliminary Recommendation for Proposed Bay Plan Amendment No. 1-25, an update to the Cartography of the San Francisco Bay Plan Maps**

(For Commission consideration on February 19, 2026)

## Preliminary Staff Recommendation

Staff preliminarily recommends that the San Francisco Bay Conservation and Development Commission:

- Amend the San Francisco Bay Plan: Part V –The Plan Maps. This amendment is for cartographic purposes only and will not result in any policy changes to the Bay Plan.
- Make necessary findings that this amendment to the San Francisco Bay Plan conforms to all applicable findings and declarations of policies in the McAteer-Petris Act.
- Make necessary findings regarding the Environmental Assessment.

An affirmative majority vote of the Commission membership (14 members) is required to amend the *San Francisco Bay Plan* maps.

## Table of Contents


PRELIMINARY STAFF RECOMMENDATION ..... 1

TABLE OF CONTENTS ..... 1

STAFF REPORT ..... 2

*I. Executive Summary* ..... *2*

*II. Background and Description of Proposed Amendment* ..... *3*

*III. Effect of BPA 1-25 on the Bay Plan* ..... *12*

*IV. Consistency with the McAteer-Petris Act* ..... *12*

*V. Environmental Assessment* ..... *13*

**Staff Report**

# I. Executive Summary

This staff report provides the preliminary staff recommendation, supporting information and analysis for the Commission's consideration of the proposed San Francisco Bay Plan Amendment No. 1-25 (BPA 1-25). The purpose of this Bay Plan amendment is to update the seven maps included in the Bay Plan to improve their cartography, data sources and accuracy, and ADA-accessibility. This amendment is for cartographic purposes only and will not result in any policy changes to the Bay Plan.

To aid in the Commission's consideration of the proposed amendment, this staff report contains:

- Background and reasoning for the proposed amendment, including how the Bay Plan maps are used and methods used for updates;
- A required statement of consistency with the McAteer-Petris Act;
- An Environmental Assessment that concludes that the proposed amendment will have no significant adverse impacts on the environment; and
- Appendices containing amended Bay Plan maps and existing Bay Plan maps (Appendix 1).

The Commission voted to initiate BPA 1-25 on September 18, 2025. The initial descriptive notice adopted by the Commission set November 20, 2025, as the original date for the public hearing on the proposed amendment. The Commission and the Executive Director extended the date of the public hearing on the proposed amendment to February 19, 2026. Consistent with BCDC's regulations, the public may comment on this preliminary staff recommendation for 30 days until **February 19, 2026,** when the Commission will hold a public hearing on BPA 1-25. Comments may be submitted in writing:

- By email to publiccomment@bcdc.ca.gov with the agenda item number or "Bay Plan Maps" in the subject line; or
- By mail with the agenda item number or "Bay Plan Maps" in the letter, mailed to San Francisco Bay Conservation and Development Commission, 375 Beale Street, Suite 510, San Francisco, CA 94105.

Public comments will also be heard in person at the public hearing on February 19, 2026. After the public hearing, staff will make any necessary revisions to the proposed Bay Plan amendment based on public and Commissioner input. Those revisions along with a final recommendation and a response to public comments will be sent to all Commissioners, Alternates, and interested parties. The Commission will then consider adoption of BPA 1-25, tentatively scheduled for March 19, 2026.

# II. Background and Description of Proposed Amendment

## A. The Bay Plan Maps and Their Purpose

The San Francisco Bay Plan includes seven static maps that serve as essential reference tools that help the public, project applicants, local governments, and other stakeholders understand BCDC's policies for particular locations around the Bay. These maps are published as part of the Bay Plan and are widely available to the public through BCDC's website and in printed form. Specifically, the maps:

- Illustrate where enforceable geographic specific Bay Plan policies apply throughout the Bay;
- Identify shoreline Priority Use Areas (PUAs) including Airport, Port, Water-Related Industry, Waterfront Park, Beach, and Wildlife; and
- Provide advisory notes and suggestions on specific areas throughout the Bay.

## B. Issues with Existing Bay Plan Maps

Despite their importance, these maps have several limitations and issues that reduce their effectiveness as communication and mapping tools. The current Bay Plan maps have not received a major update since at least 2006, with only minor updates to reflect amendments to Priority Use Area boundaries and related Bay Plan Map Policies and notes. In addition, the maps are not consistent with current cartographic best practices, are difficult to update, may not reflect the geography of the existing shoreline, and are not accessible to individuals with disabilities. Examples of flaws in the existing maps are described below and in Table 1:

- *Unclear symbology*. The existing maps use the same symbology or color shapes for different feature types, creating confusion for users. Some lines are not defined in any of the legends, leaving the user uncertain about their meaning.

- *Not ADA Accessible*. The existing maps include font sizes that are smaller than recommended for visually impaired readers and utilize symbology that does not meet color contrast standards.

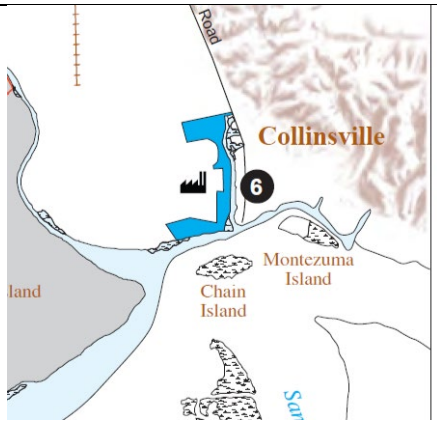
- *Illegible and incomplete labels*. Font sizes on existing maps are too small to read when printed at scale, making it difficult to identify specific locations. Some landmarks are labelled but do not have any connection to BCDC policies and do not assist orienting viewers to the map. These labels can make it more cluttered and difficult to read the maps.

- *Inconsistent jurisdictional boundaries.* The existing maps depict BCDC's jurisdictional boundaries inconsistently across different geographic areas. This can create confusion about the extent of the Commission's regulatory authority and where the Bay Plan policies apply. The maps also use inconsistent colors and lines to depict the Bay's edge, making it difficult for users to understand BCDC's jurisdictional limits.

- *Outdated data sources.* Data representing the physical environment and built infrastructure is out of date in the existing maps and does not represent current conditions.

- *Difficult to maintain and update.* The existing maps are not currently published using Geographic Information System (GIS), which makes them difficult to update with recent, more accurate data.

***Table 1: Excerpts from existing Bay Plan Maps that show issues described above.*** *These map excerpts are not shown to scale.*

| **Existing Map Issue Description** | **Example 1** | **Example 2** |
|---|---|---|
| *Unclear and inaccessible symbology*. Symbols are hard to distinguish or are not explained in the legend | | |
| | The Waterfront Park, Beach Priority Use Areas and the Scenic Drives are both shown in the same green, making it unclear what feature type is represented. | The dashed hollow and dashed green lines here are not defined in any legend, which causes confusion on what these lines mean. |
| *Inconsistent jurisdictional boundaries.* The western and eastern extent of Bay jurisdiction are not displayed the same way | |  |
| | The light blue Bay color extends west of Pt. Bonita and Pt. Lobos, beyond where BCDC's Bay jurisdiction ends. | The light blue Bay color ends at a black line where BCDC's jurisdiction ends at the interface with the Delta. |

## C. Cartographic Best Practices

The existing Bay Plan maps are not fully consistent with current cartographic best practices established by the US Geological Survey (USGS) and other mapping collaborators. These groups emphasize several key practices that are integrated into the amended maps:

- Accuracy: Ensure data is complete and accurate and from authoritative regional sources.
- Legibility & Clarity: Ensure all elements are readable and avoid cluttered maps.
- Accessibility: Use colorblind-friendly palettes (*e.g.*, avoid red/green together) and test for grayscale printing. Where necessary, use icons and symbols to further differentiate between classes.

## D. Proposed Updates and Goals Achieved

Staff recommend a limited amendment to enhance readability, accuracy, and accessibility of the Bay Plan maps. The amended Bay Plan maps will be easier to use as a reference for understanding and applying the Bay Plan policies and BCDC-related laws and regulations through clearer symbology and more geographically accurate maps (Figure 1). As part of this process, BCDC staff is **not** recommending modifying the Bay Plan Maps in a way that would result in policy amendments or changes to any Priority Use Areas (PUAs), Bay Plan Map Policies, or notes within Section V of the Bay Plan, aside from listing PUAs (numbers, names, and designations), updating cited data sources, and adding page numbers. **Appendix 1** contains the proposed revisions to the Bay Plan Maps. The appendix is organized into two sections for comparison: amended Bay Plan Maps with accompanying text, followed by the existing Bay Plan maps.

Specifically, the proposed Bay Plan Amendment will update the following:

- **Accuracy.** The amended maps will use best available regional data for reference features (*e.g.*, highways and railroads, tidal marsh, and Baylands), digitize features from historic documents where records are missing (*e.g.*, salt marsh/managed wetland, scenic drives, and scenic vistas), incorporate elements of BCDC's draft Jurisdictional Screening map, and show additional regional context (*e.g.*, county boundaries). The PUA boundaries will be consistent with the boundaries described in Resolution 16 and the interactive online map. The amended maps will accurately and consistently depict the estimated extents of BCDC's jurisdiction throughout the Bay area, eliminating the current inconsistencies that confuse users about where the Commission's policies apply.

- **Legibility and Clarity.** The amended maps will use clear, distinct symbology for different features and correspond directly to the legends explaining map elements. The amended maps will also reduce unnecessary landmark labels, consistently label PUAs, and increase the font size of the labels to improve legibility.
- **Accessibility.** The revised maps will conform to more ADA compliant best practices for color contrast and readability.

These updates will achieve several important goals for BCDC:

- **Enhance communication of BCDC policy.** Improved maps make it easier for the public, applicants, local governments, and other stakeholders to understand where and how Bay Plan policies apply.
- **Improve visual clarity and accessibility.** Amended maps include ADA compliant best practices making the maps usable for people with disabilities, and conform to State of California laws and policies regarding digital accessibility.
- **Streamline future Bay Plan map amendments.** BCDC staff will migrate Bay Plan maps to GIS, making maps more accurate and consistent with our published online PUA data, as well as making future amendments and map updates more efficient.

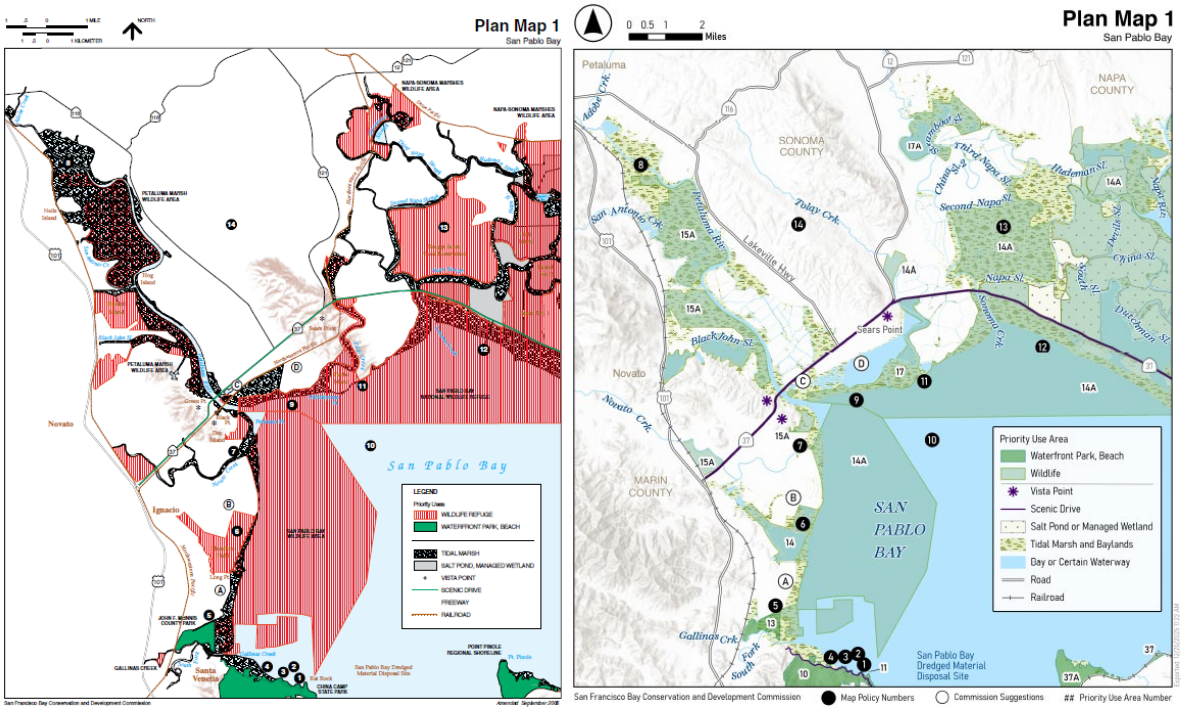



**Figure 1: Comparison of existing and amended Bay Plan maps.** Existing map (left) and amended map (right) showing differences in symbology, data sources, and labeling. Appendix 1

contains the proposed revisions to the Bay Plan Maps (Section V of the Bay Plan). The appendix is organized into two sections for comparison: amended Bay Plan Maps with accompanying text, followed by the existing Bay Plan maps.

## E. BCDC Strategic Plan and Previous Actions

This amendment is part of a series of work to modernize the Commission's data and mapping tools. It supports the Commission's Strategic Plan Goal 4, "Communicate more successfully externally with stakeholders and internally among divisions", by providing consistent and accessible maps relevant to BCDC's jurisdiction, laws, and policies. In 2023, BCDC staff digitized PUA boundaries through GIS, and for the first time, made this data publicly available through an online mapping application. BCDC staff collaborated with local government mapping resources to ensure accuracy and consistency with local government parcel data. On April 20, 2023, the Commission approved the usage of these digital resources and voted to adopt clarifying edits to Resolution 16 describing the boundaries of the PUAs in the 100-foot Shoreline Band jurisdiction.

## F. Response to Commission Comments Following Initiation

At the September 18th, 2025 meeting when the Commission voted to initiate BPA 1-25, Commissioners raised several questions and comments about the proposed Bay Plan map updates. Staff has incorporated Commission feedback into the amended maps and provides the following responses to key comments:

### Cartographic Aesthetic Appeal

Commissioners requested that the amended maps not just address functionality but also look more visually appealing, whether through color choice, symbology, or composition of map layers. In response, BCDC's Bay Development and Design Analysts conducted multiple rounds of internal review focused on:

- Color palette selection that balances aesthetic quality with functional requirements (accessibility, clarity, printability)
- Spatial layout and composition of map space
- Balance between information density and visual clarity

### Alignment with other BCDC mapping products

Commissioners noted inconsistencies between the symbology used in the existing printed Bay Plan maps and BCDC's interactive online maps, particularly regarding PUA colors and boundary depictions. Staff has addressed this comment by:

- Standardizing PUA boundary representations to match Resolution 16 and the interactive online PUA map
- Coordinating color schemes between print and digital where technically feasible
- Ensuring that PUA numbers, names, and designations are consistent across all BCDC mapping products

### Data Sources and Regional Collaboration

Commissioners asked staff to confirm that the data sources selected for the amended maps represent the best available regional and local data. As part of the map updates, BCDC staff ensured the amended Bay Plan maps reflect the most accurate geographic information available. The identified data sources and methods are described in detail in Table 2. These regional data layers represent road and railroad transportation networks, salt ponds and managed marshes, tidal marsh and baylands, landmarks, scenic vistas and drives, and other key elements. These cartographic updates are part of longer-term effort by BCDC to collaborate with regional and local governments and entities to improve accuracy and utility of its mapping and data tools. In addition, the updated maps reflect more accurate information obtained from local sources, including local parcel data, particularly regarding the boundaries of the PUAs.

**Table 2: Changes made to the maps by data layer, with regional data sources noted where applicable.** The existing data source and the amended data source is listed, along with a brief description of the methods for developing the new data, when applicable.

| Map Data Layer | Existing Map Data Source | Amended Map Data Source | Data Methods (if applicable) |
|---|---|---|---|
| Landmark Labels | Unknown | BCDC 2024 | • Organized into various label categories (*e.g.*, Water, Natural Landmarks, Transportation, and Priority Use Area Numbers)<br>• Determined as staff which label categories should all be labeled (*e.g.*, streams, major bridges, and counties) and which landmarks should only be labeled if they were directly mentioned in the regulations/plans (*e.g.*, islands, Cities/Towns). |
| Scenic Drives | Unknown | BCDC 2024 | • Reviewed existing Bay Plan Maps and digitized the scenic drives to correspond with the roads as originally referenced, with some having changed slightly due to modern road alignments. |

| | | | |
|---|---|---|---|
| | | | • BCDC Bay Development Design Analyst reviewed the digitized scenic drives and conducted site visits, as needed, to confirm their location. |
| Salt Pond or Managed Wetland | EcoAtlas version 1.0bc (SFEI 1996) | BCDC 2024 | • Conducted historic record review, including Diked Historic Baylands Staff Report (1982) and Salt Ponds Staff Report (2005) and permit records that cited Salt Pond or Managed Wetland jurisdiction.<br>• The shape and extent of the Salt Ponds and Managed Wetlands was estimated based on staff report maps and present day levee alignment. These were mapped using SF Bay Shore Inventory (SFEI 2016) and Suisun Marsh Private Managed Wetlands (BCDC 2025) and then buffered by 80 feet to estimate the extent of the outboard toe of the levee. Where significant differences were observed, features were modified manually using historic aerial imagery. |
| Tidal Marsh and Baylands; Open Water | EcoAtlas version 1.0bc (SFEI 1996) | Baylands Habitat Map 2020 (SFEI 2024) | • Open Water and Tidal Marsh and Baylands were estimated based on elevation and habitat data used in the Baylands Habitat Map 2020 (SFEI 2024). Elevations that limited the mapped extent (Mean High Water and 5 feet above Mean Sea Level) were from the San Francisco Bay Coastal Study (AECOM/FEMA 2016).<br>• Additional modification were made to the Baylands Habitat Map 2020 (2024) to incorporate elements of BCDC jurisdiction and assigned categories of 'confidence' based on uncertainty associated with data inputs. |

| | | | |
|---|---|---|---|
| | | | • Open Water data was restricted to those features with High and Medium Confidence. Low confidence features were filtered out of the maps where there was greater uncertainty about extent of tidal action, connectivity to the Bay, or provenance of tidal control structures (*e.g.*, Foster City lagoons).<br>• Jurisdictional limits based on laws/regulations were also accounted for via exclusions and bounding geometries that were manually digitized based on written descriptions. These were reviewed and approved by BCDC legal staff. Examples of these limiting geometries are jurisdictional limits (described in BCDC Regulation section 10121), exclusion areas (described in 14 CCR Appendix B and McAteer Petris Act section 66610), and the western (Pacific Ocean) and eastern (Delta) limits of BCDC jurisdiction (described in McAteer Petris Act section 66610). |
| Railroads | Unknown | MTC 2021 | • Combined passenger rail, freight rail, and BART line segments. MTC serves as the regional transportation planning agency and maintains GIS data on regional transportation networks. |
| Roads | Unknown | MTC 2021 | • Filtered to 'State' or 'Interstate' Route Type. MTC serves as the regional transportation planning agency and maintains GIS data on regional transportation networks. |
| County Boundaries | NA | CalFire 2016 | • Clipped county boundaries at the shoreline, not showing the bayward portion of counties. |

## III. Effect of BPA 1-25 on the Bay Plan

14 CCR § 11003(b)(3) requires the staff planning report to include, "a statement describing the effect the proposed change would have on any existing finding, policy, or map designation contained in the San Francisco Bay Plan, a Commission special area plan, the San Francisco Bay Area Seaport Plan, the Suisun Marsh Protection Plan, or any other plan administered by the Commission."

As described in the Preliminary Staff Recommendation, if adopted, BPA 1-25 would amend Part V (The Plan Maps) of the Bay Plan. BPA 1-25 will not result in any changes to existing findings or policies in the Bay Plan.

Appendix 1 contains the proposed revisions to the Bay Plan Maps. The appendix is organized into two sections for comparison: amended Bay Plan Maps with accompanying text, followed by the existing Bay Plan maps.

As outlined in Section II.D, the proposed amendment will update the Bay Plan Maps to improve accuracy by using best available regional data and consistently depicting BCDC's jurisdictional extents, including Priority Use Area boundaries consistent with Resolution 16 and the interactive online map; enhance legibility through clear symbology, consistent labeling, and improved font sizes; and increase accessibility by conforming to ADA-compliant standards for color contrast and readability.

## IV. Consistency with the McAteer-Petris Act

14 CCR § 11003(b)(4) requires the staff planning report to include, "a statement describing the consistency of the proposed change with the findings and declarations of policy in the McAteer-Petris Act (California Government Code Sections 66600 through 66694) if an amendment to the San Francisco Bay Plan is proposed." Section 66652 of the McAteer-Petris Act also states:

> The commission at any time may amend, or repeal and adopt a new form of, all or any part of the San Francisco Bay Plan but such changes shall be consistent with the findings and declarations of policy contained in this title.

This section analyzes the consistency of the Bay Plan Map updates with relevant findings and declarations of policy in the McAteer-Petris Act. Section 66651 of the McAteer-Petris Act states that the San Francisco Bay Plan is "a comprehensive plan containing statements and *maps*…that shall constitute the plan for the commission to use to establish policies for reviewing and acting on projects…." (emphasis added). This section recognizes maps as an essential component of the Bay Plan. Together, these sections grant the Commission the authority to update the Bay Plan maps as part of a comprehensive, regular planning process.

As described in the San Francisco Bay Plan Part V: The Plan Maps, the maps included in the Bay Plan, "are integral part of the Bay Plan. They are based on—and show how to apply—the Bay Plan policies." The maps identify the Bay Plan-designated PUAs (as provided by California Government Code Section 66602), include enforceable geographic-specific Bay Plan Map Policies, provide advisory notes and suggestions, and assist in jurisdictional determinations.

The proposed map updates are also consistent with California Code of Regulations Section 10131, which clarifies that the Bay Plan Maps "portray the actual location of land and water, salt ponds, managed wetlands, certain hills, marshes, and man-made features. However, the maps do not establish the extent of the Commission's jurisdictions."

Based on BCDC staff's preliminary analysis, BPA 1-25 is consistent with the findings and declarations of policy of the McAteer-Petris Act.

## V. Environmental Assessment

14 CCR section 11003(b)(6) requires that this staff planning report contain:

> an environmental assessment, which shall either (i) state that the proposed amendment will have no significant adverse environmental impacts or (ii) shall describe any possible significant adverse effects that the proposed amendment would have on the environment and shall describe any public benefits of the proposed amendment, any feasible mitigation measures that would lessen the significant adverse environmental impact(s) and shall evaluate any feasible alternatives to the change.

In turn, 14 CCR section 11521 specifies that the contents of an Environmental Assessment (EA) should contain a summary of the following:

a. a brief description of the proposed activity;
b. all substantial, adverse environmental impacts that the proposed activity may cause;
c. all irreversible environmental impacts that the proposed activity may cause;
d. any feasible mitigation measures that would reduce such substantial adverse environmental impacts;
e. any feasible alternatives, including design alternatives, to the proposed project that would reduce such substantial adverse environmental impacts; and
f. such other information that the Executive Director believes appropriate.

14 CCR sections 11003(b)(6) and 11521 are part of the regulations that BCDC has promulgated to implement its certified regulatory program under the California Environmental Quality Act ("CEQA"). These regulations specify the required contents of environmental assessments generally when BCDC acts as CEQA lead agency – as it always does in the Bay Plan amendment context.[1]

More generally under the CEQA regime, CEQA only applies to "projects" (potentially inclusive of planning-level actions) that may cause a direct or physical change in the environment, or a reasonably foreseeable indirect physical change in the environment. (Public Resources Code § 21065.)

The proposed adoption of BPA 1-25 is not an activity or "project" subject to CEQA because it does not have the potential for resulting in either a direct physical change on the environment or a reasonably foreseeable indirect physical change in the environment. (14 CCR §§ 15060(c)(2), 15378(a).) Because BPA 1-25 focuses solely on cartographic updates, BPA 1-25 is not capable of causing any direct physical changes to the environment nor will its adoption result in any physical projects or development.

Additionally, BPA 1-25 does not have the potential to cause a reasonably foreseeable indirect physical change in the environment. BPA 1-25 merely updates existing Bay Plan maps to reflect the best available regional data on reference features and boundary lines, digitize historic features, and assist users in more accurately identifying areas within BCDC's jurisdiction. Other changes to the Bay Plan maps incorporate clearer and more legible symbology to improve consistency across maps as well as promote ADA accessibility. Because BPA 1-25 only focuses on improving the readability, accuracy, and accessibility of Bay Plan maps, it is not capable of resulting in any reasonably foreseeable indirect physical changes in the environment. In short, BPA 1-25 is not the type of action that is capable of resulting in *any* physical change in the environment, since its only effect is to clarify and update Bay Plan maps for informational accuracy and usability

In summary, as required by BCDC's regulations regarding environmental assessments, the update to the Bay Plan maps will have no significant adverse or irreversible environmental impacts (14 CCR §§ 11003(b)(6), 11521(b)-(c)), so no mitigation measures or alternatives are required to be considered in order to reduce any substantial adverse environmental impacts (14 CCR §§ 11521(d)-(e)).

[1] The significance of BCDC's certified regulatory program is that environmental assessments prepared under BCDC's own regulations are used instead of the documents that would normally be required by CEQA (*e.g.*, environmental impact reports; mitigated negative declarations; negative declarations). (Public Resources Code § 21080.5(a); 14 CCR § 15250.) Certification of BCDC's regulatory program amounts to a determination that BCDC's program includes procedures for environmental review and public comment that are "functionally equivalent" to CEQA compliance.