

October 20, 2017

Robert Z. Guerrero  
Senior Project Manager  
Solano Transportation Authority  
One Harbor Center, Suite 130  
Suisun City, CA 94585

Dear Mr. Guerrero:

We are writing to provide comments from the State Route (SR) 37 – Baylands Group on the *Draft SR 37 Transportation and Sea Level Rise Corridor Improvement Plan*, dated September 18, 2017.

The SR 37 – Baylands Group is comprised of North Bay wetland land managers, ecological restoration practitioners, and other stakeholders with a long-term interest in the conservation and restoration of the San Pablo Baylands. Significant public investments have already been made along the length of the SR 37 corridor to protect and restore functional wetlands, ecosystem connectivity, climate resilience, and protect infrastructure, including SR 37. We recognize that the challenges of severe congestion and seasonal flooding that currently plague SR 37 and will be exacerbated by sea level rise and increasing population in the North Bay call for a SR 37 redesign solution. However, such a redesign must be guided by sustainable principles and protect the values and services that the natural and agricultural lands provide to the residents of the region. The investment in long-term sustainability made now will pay enormous dividends for future generations in avoided infrastructure costs. We look forward to working together, along with local stakeholders and regulatory agencies, to ensure that the SR 37 alternatives include design features that protect and restore habitat connectivity, wetlands, and agricultural lands.

The SR 37 – Baylands Group (Baylands Group) was convened in June 2017 by the Sonoma Land Trust in response to the formation of the State Route 37 Policy Committee and its stated purpose of advancing plans to redesign and rebuild SR 37. We are committed to ensuring that redesign of SR 37 is compatible with and advances the ecological restoration and conservation goals for the San Pablo Baylands (See attached SR 37 – Baylands Group *Vision Statement and Guiding Principles*). To support this effort, the State Coastal Conservancy is providing regional leadership to the Baylands Group through a partnership with Sonoma Land Trust under the Conservancy's Climate Ready Technical Assistance Grant Program, and San Francisco Bay Joint Venture (Joint Venture) is funding the San Francisco Estuary Institute to provide technical support. In addition, the Joint Venture's Management Board, composed of non-profits and state and federal agencies working on San Francisco Bay habitat conservation, passed a resolution giving its support to a redesign of SR 37 that is compatible with and advances the ecological restoration and conservation goals for the San Pablo Baylands.

The Baylands Group is developing a Preliminary Vision for the four-county SR 37 corridor (San Pablo Baylands), which will include a map depicting existing habitats, completed, current, and planned habitat restoration projects, and conceptual diagrams of ecological processes illustrating the importance of connectivity across SR 37. We anticipate working with the Policy Committee to incorporate the Preliminary Vision into the SR 37 corridor plan and design process via collaboration between the Baylands Group and MTC's Environmental Working Group.

Our comments follow.

### Phase 1: Corridor Improvement Plan

1. Improvements to the SR 37 corridor should be integrated with implementation of existing habitat goals and the extensive ecological planning for this region that has already occurred to ensure ecosystem function and landscape resiliency into the future.
2. The corridor improvement project should be defined as an array of alternatives that meet goals to relieve traffic congestion of SR 37 while adapting to sea level rise rather than assuming the road will be reconstructed in its current location. Integration of the project's transportation and ecological goals could be achieved by elevating the highway on a bridge causeway, moving traffic inland, planning for alternative transportation options, or other alternatives.
3. A thorough examination of alternatives, including an inland highway and a North Bay bridge, is needed. Since the Corridor Improvement Plan is intended to feed into the California Environmental Quality Act (CEQA) process, it is important not to rule out alternatives that would avoid impacts to baylands habitats at this stage. Redesign of the highway in its current alignment should be selected as the preferred alternative only if it is determined, through CEQA analysis, to be the least environmentally damaging option.
4. In developing the alternative of reconstructing SR 37 along its current alignment, improved ecological connectivity should be a central objective. The primary means of achieving this objective is to "Elevate Highway 37 and modify or realign rail lines and other infrastructure to allow the full passage of water, sediment and wildlife." This recommendation is found in *The Baylands and Climate Change: What We Can Do*, the 2015 update to the 1999 *Baylands Ecosystem Habitat Goals* report. The 2015 Science Update represents the consensus of over 100 scientists representing a cross section of expertise and experience gained through studying and working in the San Francisco Bay.

Historical ecology should be the starting point for understanding the San Pablo Baylands and the need for improved connectivity. For example, east of Sonoma Creek, there was a naturally-occurring wave-built berm along part of the area that is now SR 37. In this area, wetlands received tidal flows through sloughs extending from rivers and creeks, rather than being directly connected to San Pablo Bay. The road was originally built on the natural berm along part of this route, but in other places the road cut through marshes and was built on a man-made berm. In those places, the road cut off the marshes from their natural tidal connection to San Pablo Bay. SR 37 is now located along the same alignment. If the road were to be rebuilt in its current location, different designs would be needed in different segments, based on the need for restoring historic hydrologic connectivity.

Given the extensive changes that have occurred over that past century and expected changes due to climate change, historical ecology is only one piece of the puzzle. To support conservation and restoration of the Baylands, SR 37 corridor improvement should include consideration of:

- a. Historical ecology;
- b. Changes that have occurred since the land was diked and drained for agriculture, including subsidence;
- c. Remaining historic habitats and other valuable existing habitats;
- d. Habitat conservation and restoration projects that have been completed or are ongoing or planned;
- e. The impacts of projected sea level rise on wetlands, including the need for marsh migration; and
- f. The needs of specific wildlife populations.

In other words, in some areas, elevation of SR 37 may be needed to restore a historic tidal connection, while in other areas it may be needed to improve habitat connectivity for endangered tidal marsh species, or to accommodate marsh migration due to sea level rise.

5. Direct impacts to habitats and wildlife, including endangered species, must be avoided or minimized. Any mitigation should be accomplished by supporting wetlands restoration in the San Pablo Baylands that is compatible with existing habitat goals for the area, not through offsite mitigation.
6. Near-term solutions should protect wetland resources and maintain restoration options to the maximum extent possible. They should be designed to avoid filling wetlands and the Bay and avoid placing infrastructure, such as sea walls, that would be barriers to tidal exchange. Near-term solutions that do not involve construction of new roadway elements (such as express bus service, park and ride lots and organized carpools and vanpools) are encouraged.
7. Near-term solutions should avoid foreclosing design options. Near-term solutions should not foster an acceptance of the status quo or a premature commitment to incremental improvements rather than open-minded consideration of a design that is significantly different from the current one. Pursuing structural near-term improvements provided on Page 26 could narrow the full range of design options and could result in foreclosure of options for tidal wetland restoration and negatively impact the connectivity discussed above.
8. Agencies leading the corridor improvement process should avoid piecemealing under CEQA. Given the limited utility of addressing current and future flood risk on one part of the highway without the others, pursuing road segment improvements as separate projects with their own environmental documents, rather than under a programmatic EIR for the whole corridor, could result in piecemealing under CEQA. CEQA does not allow piecemealing because it can result in underestimating significant impacts and can hinder development of a comprehensive solution.

## **Phase 2: Design Alternatives Assessment**

9. Project alternatives developed in the Design Alternative Assessment (DAA) for the segment between SR 121 and Mare Island should be evaluated based on their ability to achieve the following goals.
  - a. As in the corridor-level analysis, connectivity that is restricted by the current form of the highway should be restored in areas where it is needed, based on consideration of the factors above (historical ecology, existing habitat, current and planned restoration projects, sea level rise projections and the need for marsh migration, needs of particular wildlife populations, etc.). Connectivity includes hydrologic connectivity needed to support wetland processes, such as sediment transport to enable marshes to keep up with sea level rise, as well as connectivity needed by fish, wildlife and plant communities.
  - b. As in the corridor-level analysis, direct impacts to habitats and wildlife, including endangered species, must be avoided or minimized. Again, any mitigation should be accomplished by supporting wetlands restoration in the San Pablo Baylands that is compatible with existing habitat goals for the area, not through offsite mitigation.

We look forward to further exploring these issues through the collaboration between the Baylands Group and MTC's Environmental Working Group.

## **Detailed Comments on the Corridor Improvement Plan**

10. Pages 8 and 19. The study uses relatively old estimates of sea level rise projections. Newer models, based on more recent observations and modeling improvements, indicate higher rates of sea level rise are likely under more extreme greenhouse gas emission scenarios. Although the mean level of sea level rise in the study is consistent with the median projection of the most recent Ocean Protection Council (OPC) report (2017), the upper limits of projections are much higher (range of NRC 2012 at 2100 17-66 inches, range of OPC study 19.2- 120 inches). As the report acknowledges, the State's guidance to plan

for a worst scenario, planning for SR 37 should include the new 10-foot projections in their planning process. An adequate assessment of project risks and costs will need to include this larger rate of sea level rise with a 100-year storm. It is also worth noting that substantial portions of sections A2 and B1 are vulnerable to inundation with only 1.6 feet of sea level rise (see [www.ourcoastourfuture.org](http://www.ourcoastourfuture.org) and below).

11. Page 11. Add the following text to the end of the sentence in the green text box: "...using nature-based solutions."
12. Page 19. Add San Pablo Song Sparrow and Chinook salmon as protected species.
13. Page 20. There should be net zero wetland loss. Many of the Baylands along the B2 section of the corridor are high quality habitat that will prove difficult to mitigate given the length of time needed for tidal marsh restoration and future projections of sea level rise.
14. Pages 34. Wetland mitigation should be performed on site, not off site. Mitigation should be within the SR 37 corridor even if large-scale on site mitigation is not feasible. Smaller mitigation sites within the watershed have potential for connectivity and expanding habitat. These localized benefits would not be realized through restoration of a large, off site mitigation parcel.
15. Throughout the document, the spelling for Ridgway's rail should be corrected. There is no 'e' after the 'g'.

### Conclusion

We view this planning process as an iterative one and look forward to our continued work with the SR Policy Committee and agency staff. The forthcoming SR 37 – Baylands Group Preliminary Vision will provide additional guidance to inform this process. Thank you for the opportunity to comment on the *Draft SR 37 Transportation and Sea Level Rise Corridor Improvement Plan*. Feel free to contact Jessica Davenport, Project Manager, State Coastal Conservancy, at [Jessica.Davenport@scc.ca.gov](mailto:Jessica.Davenport@scc.ca.gov) or (510) 286-4164 with any questions you may have.

Sincerely,

### SR 37 – Baylands Group

- Audubon California
- Ducks Unlimited Inc.
- Marin Audubon
- Point Blue Conservation Science
- San Francisco Bay National Estuarine Research Reserve
- San Francisco Estuary Institute
- San Pablo Bay National Wildlife Refuge, U.S. Fish and Wildlife Service
- Save the Bay
- Sonoma Ecology Center
- Sonoma Land Trust
- Sonoma Resource Conservation District
- State Coastal Conservancy
- Fraser Shilling (Road Ecology Center, UC Davis; for identification purposes)
- Peter Baye, Independent Consulting Wetland Ecologist

### Attachment:

SR 37 – Baylands Group *Vision Statement and Guiding Principles*

## State Route 37 — Baylands Group

### Vision Statement and Guiding Principles

This Vision Statement and Guiding Principles were developed by the State Route (SR) 37 – Baylands Group, which is composed of North Bay wetland land managers, ecological restoration practitioners, and other stakeholders interested in the conservation and restoration of the San Pablo Baylands.

#### Vision:

Integrate infrastructure improvements for SR 37 with existing and future habitat planning, conservation and restoration to ensure healthy ecosystem function and resilience to landscape scale change of the San Pablo Bay.

#### Guiding Principles:

1. The San Pablo Baylands are one of the largest open spaces remaining on the San Francisco Bay and provide a unique opportunity for improving habitat conservation. Improvements to the SR 37 corridor should be integrated with implementation of the *Baylands Ecosystem Habitat Goals*<sup>1,2</sup> to ensure ecosystem function and landscape resiliency into the future.
2. We recognize the extensive ecological planning that has come before and seek to integrate it with SR 37 plans and design.
3. Multiple issues, including increased traffic, sea-level rise and land use changes, make implementation of both SR 37 redesign and habitat goals urgent and time sensitive; planning should lead to implementation.
4. Disadvantaged communities are disproportionately affected by tolls. Therefore, we seek opportunities to minimize financial impacts to disadvantaged drivers and to ensure that the highway design relieves, rather than redirects transportation pressure.
5. While the SR 37 corridor extends from east to west, ecological enhancement and flood protection opportunities occur from north to south across SR 37 as rivers and creeks (i.e., Napa River, Sonoma Creek, Tolay Creek, Petaluma River, and Novato Creek) connect the bay's mudflats and marshes to their watersheds.
6. The SR 37 design will not negatively impact the significant investment in existing and future conservation and restoration projects and associated public access and recreational facilities in the San Pablo Baylands, and will seek to enhance them wherever possible.
7. The SR 37 and ecological design will plan for and accommodate sea level rise through 2100, thereby increasing resilience and reducing future costs.
8. The SR 37 design will include opportunities for multi-modal transportation including bike paths and passenger rail.
9. We recognize design constraints related to federal, state and local transportation regulations and engineering guidelines, and we seek opportunities for ecological innovation recognizing these constraints.

---

<sup>1</sup> Goals Project. 1999. Baylands Ecosystem Habitat Goals. A report of recommendations prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project. First Reprint. U.S. Environmental Protection Agency, San Francisco, Calif./S.F. Bay Regional Water Quality Control Board, Oakland, Calif.

<sup>2</sup> Goals Project. 2015. *The Baylands and Climate Change: What We Can Do. Baylands Ecosystem Habitat Goals Science Update 2015* prepared by the San Francisco Bay Area Wetlands Ecosystem Goals Project. California State Coastal Conservancy, Oakland, CA.

## SR 37 — Baylands Group

10. By understanding that ecological and physical processes differ along the transportation corridor, it will be possible to develop ecologically appropriate design criteria for each section.
11. We understand that the language we use should be clear and recommendations feasible and practicable for the SR 37 design.
12. We acknowledge the importance of developing a SR 37 design that protects the mosaic of existing land uses, such as farming and ranching, and the ongoing operation of stormwater pumps and other infrastructure on public and private lands in the San Pablo Baylands.

Who We Are:

The SR 37 Baylands Group was initially convened in June 2017 by the Sonoma Land Trust in response to the acceleration of plans to redesign and rebuild SR 37. The group's goal is to contribute to a cross-sector plan to redesign the SR 37 corridor for climate resilience, transportation efficiency and ecological restoration.

The SR 37 Baylands Group is open and informal. The State Coastal Conservancy is providing regional leadership to the group through a partnership with Sonoma Land Trust under the Conservancy's Climate Ready Technical Assistance Grant Program. The Conservancy is facilitating communication and engagement with other agencies, including the California Department of Transportation, the Metropolitan Transportation Commission, and environmental regulatory agencies. The Conservancy, the Sonoma Land Trust and the San Francisco Estuary Institute volunteered to convene an initial series of committee meetings, which are being facilitated by the Center for Collaborative Policy.

The first committee meeting in July 2017 focused on the development of the Vision Statement and Guiding Principles. The document was developed by group members who attended the meeting or contributed input or support via email. They include individuals affiliated with the following agencies and organizations: Audubon California, California Department of Fish and Wildlife, California Wildlife Conservation Board, Ducks Unlimited, ESA, Friends of the San Pablo Bay National Wildlife Refuge, Marin Audubon, National Heritage Institute, Point Blue, Sonoma Resource Conservation District, Sonoma County Agricultural Preservation and Open Space District, State Coastal Conservancy, San Francisco Bay Joint Venture, San Francisco Estuary Institute, Solano Land Trust, Sonoma County Water Agency, Sonoma Ecology Center, Sonoma Land Trust, The Bay Institute, UC Davis, United States Fish and Wildlife Service, and UC Berkeley.



October 13, 2017

Mr. Robert Guerrero  
Solano Transportation Authority  
One Harbor Center, Suite 130  
Suisun City, CA 94585

**SR 37 Transportation and Sea Level Rise Corridor Improvement Plan**

Dear Mr. Guerrero:

The Marin, Sonoma, and Napa County Bicycle Coalitions appreciate the opportunity to provide input on the SR 37 Transportation and Sea Level Rise Corridor Improvement Plan. Our organizations work to promote safe bicycling for transportation and recreation.

The North Bay is celebrated for its picturesque cycling opportunities in spite of limited access to its baylands and east-west connectivity between counties. Given the increasing adoption of e-bikes, which greatly expand the reach of bicycles for a broader population, the desire to choose active transportation for utilitarian or recreational purposes will continue to grow. Most people, however, will choose to bike only if facilities are designed in a safe and inviting manner.

Investments along the Highway 37 corridor present a unique opportunity to address these needs and enable people to access and enjoy the North Bay's shoreline and wetlands. It is a key 19-mile stretch in the long-planned 500-mile San Francisco Bay Trail and would provide a needed east-west connection between a number of regionally-significant multi-use pathways that are existing or planned, including the North-South Greenway/SMART Pathway, Petaluma River Trail, and Napa Vine Trail.

We appreciate the steps being taken to address the corridor's worsening traffic congestion and threat of sea level rise, but are troubled by the lack of consideration given to those who would use the corridor by foot or bike. Our recommendations are as follows:

- 1. Provide a physically separated, continuous multi-use pathway that accommodates people travelling by foot and bike.** In order for the corridor's multi-use pathway to meet its potential as a world-class facility, we urge the agencies to 1) expand access to include those travelling by foot and 2) design it in a manner that is safe and appealing. On the latter, it's crucial that the pathway is physically separated and protected from vehicular traffic. The use of rumblestrips as a buffer between people bicycling and heavy traffic travelling 50+ MPH is unacceptable.
- 2. The multi-use pathway described above should be included as a baseline element of the project.** This multi-use pathway should be planned, designed, permitted, funded, and built in lockstep with the rest of the project.
- 3. The multi-use pathway must connect seamlessly with other regional and local bicycle and pedestrian networks.** As noted above, a multi-use pathway along the Highway 37 corridor has the potential to connect to a number of existing and planned pathways. These connections should be prioritized as the design process advances.

As the project moves forward, please ensure that near, mid, and long-term improvements for the corridor advance the recommendations listed above with the underlying goal of creating a corridor that is safe and inviting for people travelling by foot and bike.

If improved as recommended above, the corridor would become an incredible recreational asset for the region. Please take advantage of this once-in-a-lifetime opportunity to deliver a project that enables people to actively and safely enjoy the North Bay's shoreline, connects our counties, and serves the larger vision of completing the Bay Trail.

Respectfully Submitted,

Bjorn Gripenburg  
Policy & Planning Director  
Marin County Bicycle Coalition

Alisha O'Loughlin  
Executive Director  
Sonoma County Bicycle Coalition

Patrick Band  
Executive Director  
Napa County Bicycle Coalition



---

*August, 2017 Draft SR-37 Corridor Plan and PowerPoint Presentation – Comments*

---

Note: Comments on the Corridor Plan also apply to the PowerPoint presentation, and vice versa, where the information is the same in each document.

SR-37 Draft Corridor Plan (SR-37 Corridor Plan-Draft 080117a.pdf)

There some spelling errors, and several grammatical errors, throughout the document that need to be corrected.

Page 3: Shouldn't datum reference be, "NAVD 88", rather than "NAVD"? Please use correct reference throughout the document, and add it to all text/figures where elevation data is used.

Page 5, Exhibit 3: Add vertical datum reference to the map legend.

Page 10, paragraph 1: Consider inserting "and increased public access." "Restoration opportunities and increased public access, through stakeholder collaboration..." In previous outreach meetings for SR 37 studies, increased public access has been brought out as one of the goals.

Page 11, Exhibit 11: Use a different color for the road network to distinguish it from the Sea Level Rise Inundation area boundaries.

Page 12, Exhibit 12: Same comment as above.

Page 13: Why is it important to mention that the strategies are consistent with the California Coastal Commission's SLR Policy Guidance? This project is not in the coastal zone, and no Coastal Development Permit would be required. If anything, there should be a discussion as to whether these strategies are consistent with BCDC's SLR guidance in the Bay Plan, as many stretches of SR-37 are within BCDC jurisdiction.

Page 15, Exhibit 13: The labels on this map are illegible.

Page 17: Same question/comment as above regarding reference to the Coastal Commission SLR Policy Guidance rather than BCDC's.

Page 17: Any new structures need to consider species migration. Center barriers should have openings for animals crossing highway, and/or additional culverts would improve migration as well.

Page 19: Include units (feet) in the table as well as reference to the vertical datum.

CALTRANS

Page 23: The description of the Segment B improvement regarding maintaining the railroad crossing dip is unclear as written. Is the idea that keeping the dip in the road will reduce truck and vehicle speeds? If so, how does this increase throughput? And what is the exact work that Northwestern Pacific will be doing to "maintain railroad dip"? Please rewrite this project description so it is understandable.

Page 24, Exhibit 20: The SR-37/SR-121 interchange improvement project is listed under Segment A, but appears under segment B on the map. Make sure it is clear throughout the document which segment the interchange is in, both in the text and the exhibits.

Page 24: Why is it assumed that there will be 1-foot of sea level rise by 2050? This is contradictory to previous statements that suggest that the strategies assumed a worst-case scenario. If that were true, then 2-feet of sea level rise should be assumed for 2050 (as shown in the NRC 2012 projections table on page 7).

Page 26, "Near-Term Improvements": Please provide some context at the beginning of this section so it is clear which intersection improvement is being described, where it is located, and why improving this intersection is the only near-term improvement (presumably) being considered. Why not any near-term improvements to address increasing flooding events or habitat restoration?

Page 27, 3<sup>rd</sup> Paragraph: The first two sentences are confusing and contradictory. The first sentence implies that constructing a project that adds capacity will have significant environmental impacts. The second sentence states that expanding the roadway will have minimal environmental impacts.

Page 28: Current concrete barriers were designed with openings to allow small animals i.e. salt harvest mouse to cross the roadway. Movable barriers would need to do the same. Also wider roads could increase endangered species road kill.

SR-37 PowerPoint Presentation File (SR 37 Corridor Plan - 20170803f.pdf)

Slide 5: First instance making reference to route segments- should be labeled on this slide. What are critical species? There is critical habitat and critically endangered species, as well as listed species. This term should be better defined.

Slide 6: Challenges with privately owned levees. The ppt goes lays out different strategies to manage the route, but it does not provide info as to how the levee challenges will be addressed. How exactly will the proposed strategies plan to protect/address private lands under the different strategies?

Slide 7: Critical Species?????

Title of both insets is Environmental Constrains- this comes across as if wetlands and listed species are purely negative considerations. Wetlands, species are "Environmental or Biological resources" not mere "constraints" and should be labeled as such. This sends a wrong message about how we value bio resources.

Slide 8: Label table as Segments Risk Rating.

CALTRANS

Slides 9 and 10: The slides don't seem to match: Are ops improvements under protecting/accommodating strategy capacity improvements? What is the difference with capacity enhancements? How does it relate to capacity increase? How would maintaining existing roadway under the "protect" strategy on slide 9, match with capacity enhancements, express lanes and multi modal facilities? Doesn't appear to me this is maintaining "existing roadway". Also, Slide 9 says ferry is not an option under retreat strategy and is not even included under the "protect" and "accommodate" strategies. Yet, it is included in Slide 11 under this latter strategy. Which one is it?

Slide 11: Bar graph shows existing capacity of segment B as 1,200-1,300 vph. Slide 3 shows it as 1,200 vph. Not consistent.

Slide 16: How would raising roadbed (causeway) protect property owners?



October 23, 2017

David Rabbitt, Chair  
State Route 37 Policy Committee  
525 Administration Drive, Room 100  
Santa Rosa, CA 95403

Via E-mail

Re: State Route-37 – Comment on Corridor Improvement Plan

Dear Mr. Rabbitt—

On behalf of *Friends of SMART*, I submit the below comments and observations concerning the Draft Corridor Improvement Plan that has been prepared by Kimley/Horn consultants. We intended to submit these comment earlier, but were evacuated during the fires, and hope they can still be considered.

The plan properly addresses the need for immediate, relatively low-cost improvements to smooth the flow of traffic at each end of the 2-lane stretch of highway, particularly at the Sears Point intersection with SR-121. However we are concerned that the plan neglects the future mobility in the corridor that will be provided by train service, while focusing on the very slight and temporary improvement offered by an added traffic lane in the “B Segment” of the highway. Caltrans has been expanding roadway capacities for 75 years; and the verdict is in: we can't pave our way out of congestion. Added traffic lanes will attract more traffic, while moving us *away from* the important goal of reducing vehicle miles traveled.

We urge that the Plan incorporate steps to encourage car-pooling, van-pools, and public transportation that will provide better options for those using the highway during rush hours, without encouraging more solo drivers. We are especially concerned about the recommendation to drop consideration of passenger rail service in the corridor. We ask that plans for this corridor explicitly include passenger rail on the existing right-of-way. The benefits of eventual rail service need to be acknowledged, and the conditions under which passenger trains could best serve the corridor should be described.

It is now widely understood that highways tend to facilitate low-density auto-oriented neighborhoods that have burdensome infrastructure costs, while rail service permits more efficient transit oriented developments. It is also important to attend to sea level rise impacts on the tracks so that SMART and NCRA are not cut off from the national rail network. Passenger rail services linking Sonoma and Napa county cities with the I-80 and US-101 corridors are likely to be needed eventually, and SMART should be able to bring in new rolling stock and rail maintenance equipment.



Unless transit options such as bus, ferry and rail services are implemented as integral parts of the Plan, it is destined eventually to fail. It is important to consider the needs of the highway *and* rail service at the same time.

We thank you and members of the Policy Committee for your deliberative approach to the congestion and sea level rise issues in this Corridor. We urge you develop a plan that addresses all of these issues. If you have inquiries concerning our recommendations, please contact me or Steve Birdlebough (707) 576-6632 or [scbaffirm@gmail.com](mailto:scbaffirm@gmail.com).

Sincerely,

A handwritten signature in black ink that reads "Jack Swearingen". The signature is written in a cursive style.

Jack C. Swearingen, Chair  
Friends of SMART



Santa Rosa Office  
555 Fifth Street, Suite 300 B  
Santa Rosa, CA 95401  
(707) 575-3661

Oct. 13, 2017

Supervisor David Rabbitt, Chair  
State Route 37 Policy Committee  
525 Administration Drive, Room 100  
Santa Rosa, CA 95403

Via E-Mail

Re: State Route-37 – Comment on Draft SR 37 Transportation and Sea Level Rise Corridor Improvement Plan.

Dear Supervisor Rabbitt,

Greenbelt Alliance appreciates the opportunity to provide these comments on the draft SR 37 Transportation and Sea Level Rise Corridor Improvement Plan (Corridor Plan). We understand that the Corridor Plan is part of the Design Alternative Assessment (DAA) process to identify near-term and long-term strategies for the SR 37 corridor. The objective of the DAA is to plan and expedite the delivery of improvements in the study corridor to address the threat of sea level rise and traffic congestion.

Greenbelt Alliance has been engaged in the public process for SR 37 corridor improvements by participating in policy committee and public workshops and meetings.

Greenbelt Alliance's comments on the Draft Corridor Plan reflect our organization's focus on land-use issues across the nine-county Bay Area region—including land conservation, smart growth development, and their intersection.

We support the stated objective of a SR 37 final plan that prioritizes environmental and habitat enhancement to create a multifunctional project that goes beyond traditional roadway corridor planning, particularly in the face of climate change, as stated on Paged 20 under Implementation Plan.

When considering the short, medium and long term options for addressing sea level rise and mobility along this transportation corridor, we urge you to consider the following:

#### **Natural and Agricultural Landscapes**

The SR 37 corridor is a regionally, nationally and internationally important greenbelt consisting of high-value protected wetlands and uplands that provide important ecosystem services including water quality, flood protection, endangered species habitat, and open space. As stated in the Corridor Plan, a net-zero wetland loss approach and large-scale on-site restoration should be prioritized throughout the DAA process.

Achieving a self-mitigating project should be the ultimate goal, as suggested by Steven Moore of the California State Water Resources Control Board at a recent panel discussion hosted by the Bay Area Resilient by Design Challenge.

As stated in the Corridor Plan, the creation and implementation of a Regional Advanced Mitigation Plan (RAMP) is one potential approach. We strongly support examining how participation in a RAMP program could foster robust, coordinated conservation activities along the SR 37 corridor.

We also urge encourage you to consider the extensive research on landscape-scale solutions for the SR 37 corridor solutions provided by UC Davis Professor and Co-Director of the Road Ecology Center Dr. Fraser Shilling.

### **Land Use**

The potential for new transportation investments in the SR 37 corridor to influence land use patterns within the corridor and across the North Bay must be considered and fully analyzed in the Corridor Plan and DAA. While much of the land along SR 37 between US 101 and Interstate 80 is protected as wetlands and open space by public and private entities, there are several privately owned undeveloped areas that could be at greater risk of sprawl depending on how the corridor changes, such as Sears Point Raceway and Port Sonoma Marina. These risks could extend into other areas as well if not carefully addressed. These potential impacts should be studied and addressed to ensure that the envisioned improvements to the area's climate resiliency and mobility patterns come to fruition.

### **Mobility**

Greenbelt Alliance urges a comprehensive analysis of public transit options and alternatives to single occupant automobile travel along the corridor as part of the Corridor Plan and DAA. The analysis should include a variety of modes including rail, ferry, express buses, car sharing, car pooling and emerging on-demand transportation models. Now that the SMART line is running, it is more timely than ever to consider improved east-west transit solutions.

Trails that provide full accessibility for biking and walking should be an integral part of the SR 37 Corridor Plan. Given that the wetlands are an important part of the Pacific Flyway, the corridor should provide trail connectivity, public access and interpretive stations. Full funding for these components need to be included in the project budget.

### **Greenhouse Emissions and Vehicle Miles Traveled**

Greenbelt Alliance urges a comprehensive analysis of the greenhouse gas emissions that will be generated by SR 37 transportation and sea level rise solutions. In particular, the full scope of Vehicle Miles Traveled with various scenarios needs to be considered. Ultimately, any increases in GHGs and VMTs should be avoided or mitigated to meet state and local greenhouse gas emission reduction mandates and objectives.

### **Social Equity**

Finally, the Corridor Plan and DAA must consider methods to equitably and sustainably address the social and economic impacts on low-income families that currently use SR 37, particularly if tolls are instituted. The options and costs for addressing this issue needs to be included in the financial analysis and should not be omitted from the Corridor Plan.

### **Next Steps**

Greenbelt Alliance urges the SR 37 Policy Committee and the county, regional and state agencies involved to prioritize transparency and coordination with the environmental community. This will allow all of us to collaborate and be the more effective in helping move the SR 37 corridor planning forward and advance a more sustainable, equitable, and economically prosperous region.

We understand that the SR 37 Planning consultant intends to meet with environmental groups later this month, and that the Metropolitan Transportation Commission is convening an environmental working group. We understand that there is also a separate Baylands Working Group meeting on a regular basis. We are unclear as to when these groups will be convened and who will be the primary facilitator of these groups. We look forward to the opportunity to provide our expertise and perspectives to these environmental and related processes on the SR 37 Corridor Plan and DAA.

Thank you for consideration of our comments. Please include us in all communications, meetings and notices related to the SR 37 corridor improvement process, Corridor Plan, DAA and Public Policy Committee.

Sincerely yours,



Teri Shore, Regional Director  
North Bay  
707 575 3661  
tshore@greenbelt.org

*Amy Hartman*  
Amy Hartman, Regional Representative  
Solano County  
(707) 400-0541  
ahartman@greenbelt.org





# DEPARTMENT OF PUBLIC WORKS

Quality, Excellence, Innovation

Raul M. Rojas  
DIRECTOR

October 13, 2017

Administration  
PO Box 4186  
San Rafael, CA 94913-4186  
415 473 6528 T  
415 473 3799 F  
415 473 3232 TTY  
CRS Dial 711  
www.marincounty.org/pw

Kevin Chen, MTC  
Bay Area Metro Center  
375 Beale Street  
San Francisco, CA 94105

## RE: Draft State Route 37 Transportation and Sea Level Rise Corridor Improvement Plan

Accounting

Airport

Building Maintenance

Capital Projects

Certified Unified Program Agency (CUPA)

Communications Maintenance

County Garage

Disability Access

Engineering & Survey

Flood Control & Water Resources

Land Development

Purchasing

Real Estate

Reprographic Services

Road Maintenance

Stormwater Program

Transportation & Traffic Operations

Waste Management

Thank you for the opportunity to review the draft State Route 37 Corridor Improvement Plan released last month. We at the Marin County Flood Control and Water Conservation District (District) and Marin County Watershed Program have reviewed the draft, and with TAM's support, our comments are as follows:

Pages 3 and 6, 7 (3 places) - There are several instances where language reads that a section of SR 37 is "protected by levees." Protect, by definition, implies that the levee owners are shielding the highway from harm or injury. It seems more accurate to say that the highway was constructed at an elevation that is below many high tides and that the original construction relied on a variety of existing levees and berms not owned by Caltrans to keep the roadway dry under most conditions. "Reliance" is used on Page 6, which seems a more accurate term than "protected". It should also be noted that this reliance is generally not based on any formal relationship between Caltrans and the levee owners. Care should be taken to distinguish the District-maintained flood control levees from Caltrans levees or other existing levees and/or berms.

It is important to note that the existing levee/berm network along Novato Creek, especially those segments downstream of the SR 37 crossing, predate the highway's construction (see USGS Quadrangle Map, Petaluma River, 1914). It is not clear if the original highway design analyzed flood protection provided by existing levee/berms along Novato Creek, especially those south of the highway alignment. The Marin County Flood Control & Water Conservation District (MCFCWD) is not aware of an explicit acknowledgement or agreement that the Novato Creek levee/berms, both upstream and downstream of the highway alignment, would be maintained and operated to provide such protection. The primary use of the lands south of SR37 and downstream of highway is for

irrigation reclamation/treated wastewater discharge with associated and complimentary agricultural uses (crop production and livestock grazing).

Page 3 states that Segment A is the most vulnerable to SLR – then provides the reasoning that it relies on levees for flood control. SLR is tied to daily tidal inundation, which is different than flood control, which is typically focused around rainfall events. Care should be taken to distinguish riverine flooding from inundation due to sea level rise.

Pages 3 and 7 - The emergency work that Caltrans performed should be more explicitly described in the Plan. Page 3 - To what elevation was the roadway raised? Page 7 - How long was the segment of roadway that was raised? It should clarify that only a short segment was raised. Page 7 indicates that Caltrans used “funds to address the flooding.” To “address” implies that the flooding issue is resolved. It may be more accurate to say that they used funds to “reduce the occurrence of flooding.”

Page 7 - Exhibit 5 is difficult to read and to pull out the information about where exactly the weak links are.

Page 14 – Traffic is also displaced to Atherton Avenue when SR 37 is closed at Novato Creek. There is no capacity on that two lane road for SR 37 traffic.

Page 16 - Exhibit 15. Sears Point/Infineon Raceway is north of SR 37; on this map the marker is south. And the train segment should be labeled Amtrak only (not Capital Corridor).

Page 17 – Please provide details for costs shown in Table 2.

Page 17 – The heading “Strategies to Protect” is followed by details on maintaining the existing roadway and operational improvements. How do they provide protection?

Page 18 - Item 2 should include the need for pump stations to move water, as gravity drainage may not work.

Page 19 – the embankment option will also likely require the need for pump stations to move water, because the roadway will function as a levee.

Page 21 - Again, it would be helpful to show and describe the weak links in more detail.

Page 21 - Table 3 reaches with “2050.” What does that imply? The text implies the DAA will identify near-term roadway and levee improvements. What are the near-term design heights?

Page 23 - Exhibit 24. For this alternative, does the traffic model account for the EB portion of the roundabout being used as a third through lane for EB 37 traffic? There is no means to preclude drivers from making such a maneuver and without signal control, it becomes like any other mixed-flow lane. Any backup on EB 37 east of this location will likely encourage this behavior which will then effectively block any movement of drivers going north on 121.

Page 24 - Include language that some levees also need to be rebuilt due to age and lack of engineered design. Simply raising the levees may not be enough. Segment B addresses the Bay Trail. Why is there no mention in Segment A? Please include an analysis of operational issues at the SR 101 interchange due to the change in westbound traffic volumes.

Page 29 - Please provide details for the Segment A Flood Protection costs.

Page 29 - Near Term Improvements Summary table: With this generic improvement it would be helpful to break this out into A1 and A2 segments or list similarly to the B segment which has project items identified for specific locations in the segment.

Page 30 – Please provide details for Segment 1 levee improvements and raised roadway costs. Please provide a basis why this work can't start in the 7-10 year timeframe.

Page 30 - Mid-to-Long-term Improvements Summary table. Similar to the Near Term table, with this generic improvement it would be helpful to break this out into A1 and A2 segments or list similarly to the B segment which has project items identified for specific locations in the segment.

Page 31 - Priority Segment. Either the heading should be changed or the first sentence truncated to state it has been identified as the priority segment for the following reasons: (and then cite the reasons). Otherwise it suggests the corridor study is primarily about capacity enhancement/congestion mitigation. Please be open to the possibility to move forward with some strategic elements in Segment A concurrent with efforts to move forward Segment B.

Sincerely,



Laurie Williams, Senior Watershed Planner

c: Nick Nguyen, TAM  
Chris Blunt, City of Novato  
Robert Guerrero, Solano Transportation Authority

October 13, 2017

David Rabbitt, Chair  
State Route 37 Policy Committee  
525 Administration Drive, Room 100  
Santa Rosa, CA 95403

Via email

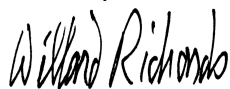
Re: State Route-37 – Comment on Kimley/Horn Corridor Improvement Plan

Dear Mr. Rabbitt:

On behalf of the Sonoma County Transportation and Land Use Coalition, I submit the attached comments and observations concerning the Draft Corridor Improvement Plan that has been submitted by the consultants, Kimley/Horn. We commend the consultant for presenting a plan that highlights the need for immediate, low-cost improvements to increase the capacity of the 2-lane stretch of highway, particularly with respect to the Sears Point intersection of SR-37 and SR-121. However, we are concerned that the Draft Plan does not explore the steps needed to encourage car-pooling, vanpools, and to extend public transportation services to the corridor.

Our Coalition has promoted improvements in public transportation and the protection of open space in Sonoma County since 1991. We thank you and members of the Policy Committee for your deliberative approach to the congestion and sea level rise issues in this Corridor. We urge you develop a plan that addresses all of these issues. Thank you again for your attention to this matter. If you have inquiries concerning our recommendations, please contact our Advocacy Chair, Steve Birdlebough (707) 576-6632 [scbaffirm@gmail.com](mailto:scbaffirm@gmail.com).

Sincerely,



Willard Richards, Chair

cc: Sonoma County: Susan Gorin, Jake Mackenzie, Suzanne Smith  
Solano County: Jim Spering, Erin Hannigan, Bob Sampayan, Daryl Halls  
Napa County: Alfredo Pedroza, Belia Ramos, Leon Garcia, Kate Miller  
Marin County: Judy Arnold, Damon Connolly, Stephanie Moulton-Peters,  
Dianne Steinhauser  
MTC: Kevin Chen

Page 2 of 3  
October 13, 2017  
Mr. David Rabbitt  
Chair, State Route 37 Policy Committee

## COMMENTS ON THE SEPTEMBER, 2017 DRAFT SR-37 CORRIDOR PLAN

Page 3, line 6 "... and critical habitat would be lost." **Revise or delete.** The relationship between habitat and permanent roadway closure due to sea level rise is complex, and would develop over many years. The environmental effects of inundation events would largely precede any final closure of the highway, and are not described further in the plan document.

Page 4, Traffic Congestion, lines 3-4 "No transit opportunities are available along the study corridor to offset vehicular demand." **Revise** this sentence to state that no concerted efforts have yet been taken to encourage car-pools, establish van-pools, or provide bus, ferry, or rail service connecting the Interstate 80 and US 101 Corridors.

Page 15, lines 3-4 "... rail transit, ferry alternatives ... were evaluated as possible strategies to retreat and it was determined that none of these are feasible standalone strategies ...." **Revise** to state that rail, and ferry options may be important within the next three decades and should be studied further. No public transportation system ever stands alone. The region is best served when transit systems and roadways support one another.

Pages 15 - 17, Rail Alternative. **Revise** to recommend further study. The "Rail Alternative" is described as a potential replacement for SR-37, when in fact it would supplement the roadway, particularly if population along the I-80 corridor continues to grow. To the extent that rail service could provide an option for people who commute from the City of Sonoma and the I-80 corridor to the US-101 corridor, it would reduce traffic on SR-37. These factors merit ongoing evaluation, and should not be dismissed. The estimated costs of various approaches to establishment of passenger rail service should be described in considerably greater detail.

Page 17, Ferry Alternative. **Revise** to recommend further study of the costs, benefits, and implementation options for various ferry alternatives that would reduce dependence on the roadway. Knowledge of these factors provides a basis for determining relative value of widening the 2-lane section of highway.

Page 17, Maintain Existing Roadway. **Revise** to call for improvement of the existing roadway in the next two or three years. In addition to the suggested lane modifications, features such as diamond lanes, lane-metering, and queue-jumping options should be evaluated to encourage use of carpools, van-pools, and to enable establishment of bus routes through the corridor.

Page 19, Raised Roadway. **Revise** to describe the current state of knowledge about the depth of bedrock along SR-37. Feasibility of the various options depends greatly on foundation conditions and on forecasts of mud compaction beneath berms. It may not be possible to proceed much further with planning until more geological information is available.

Page 20, Environmental Mitigations. **Revise** to address the potential noise, air pollution, and greenhouse gas impacts of an elevated and widened roadway.

Page 22, Exhibit 20: Study Corridor Segments. **Display all** of the railroad track locations, including the eastern segment from the bridge over the Napa River to Napa Junction.

Page 22, Lane-Drop Merge at SR 121 Intersection. **Add** a description of queue-jumping options, diamond lane and lane-metering opportunities to encourage car-pools, van-pools, and to make

Page 3 of 3  
October 13, 2017  
Mr. David Rabbitt  
Chair, State Route 37 Policy Committee

bus service along SR-37 an attractive option. Without such features, it is likely that the Express Bus Transit Service discussed on page 23 would attract fewer riders, and there would be little likelihood of reducing the proportion of single-occupant vehicles in the corridor.

Page 23, Paragraph 3: “Improve Merge and Lane Drop at Mare Island WB On-Ramp.” **Add** a description of diamond lane and lane-metering opportunities to encourage car-pools, van-pools, and to make bus service viable, as described above.

Pages 23-24, Express Bus Transit Service. **Revise** to include van-pool and car-pool improvements. Rather than calling for a separate study of ways to reduce reliance on single-occupant vehicles, make this a significant part of the Corridor Plan. Coordinate the Corridor Plan with Climate Action Planning by the four counties.

## Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-331-1982

October 25, 2017  
By E-Mail

David Rabbitt, Chair  
State Route 37 Policy Committee  
525 Administration Drive, Room 100  
Santa Rosa, CA 95403

Re: SR 37 Transportation and Sea Level Rise Corridor Improvement Plan

Dear Mr. Rabbitt:

TRANSDEF, the Transportation Solutions Defense and Education Fund, is a Bay Area non-profit environmental organization focused on reducing the impacts of transportation on the climate. We appreciate this opportunity to offer these comments on the draft SR 37 Transportation and Sea Level Rise Corridor Improvement Plan (Corridor Plan). All page references are to the Corridor Plan unless otherwise noted.

### Setting

It is inconceivable that a new highway could be built through sensitive wetlands such as those that exist in the Highway 37 corridor, due to the proliferation of scientific understanding of the environmental significance of wetlands, and the laws and regulations that have followed. It's only because Highway 37 was built long before the advent of environmental protection that a rebuilding of the highway is now even being discussed.

Because the Corridor Plan is based on an incomplete foundation (discussed in this section and the next), it is an inadequate and incomplete approach to achieving the goals described on page 3. Everything the Policy Committee has been considering for Highway 37 is taken from the State Route 37 Integrated Traffic, Infrastructure and Sea Level Rise Analysis: Final Report, U.C. Davis, 2016. However, the Davis study was severely limited by the following simplifying assumptions:

- 1) Only expansion of the number of lanes was considered, from 2 to 4 for segment B. No consideration was given of restricting travel on the primary re-constructed segments (A and B) to 2 lanes, or 3 lanes, where 2-lane travel would take place during directional rush-hour, with the center lane serving one direction and then the other. Both approaches would reduce cost and environmental impact.
- 2) **No consideration was given to moving the highway alignment inland**, or combining with existing highways with

less exposure to SLR. This option was discussed in Phase I and was seen as impractical, primarily because it is not typically done. However, Caltrans is currently considering moving SR 1 inland in coastal areas because of regular flooding and slope failure. It is likely that consolidation of vehicle-travel routes inland would be less expensive than adapting shoreline structures to the continuously moving target of SLR and increased storm energy.

3) Similarly, no consideration was given to building a tunnel or bridge structure across San Pablo Bay (at its narrowest point) to provide the travel opportunity, but without retaining an alignment across the marshes. These scenarios were considered in Phase I, but were not included in this Phase.

4) Although transit was considered for multi-modal travel along the corridor, only bus transit was noted. Other forms of transit were briefly discussed, but serious analysis of transit remains to be carried out.

5) SLR is often thought of as a predictably-changing process where impacts will linearly increase with time/SLR. However, impact costs increase faster than the rate of SLR (Boettle et al., 2016), which includes storm-related impacts to areas that were previously unprotected. In CA over the last year (2015-2016), sea elevations have been up to 10" higher than expected due to the El Nino. This sudden rise in sea levels and increased storminess that accompanies El Nino events means that new areas on the CA shoreline will become exposed faster than expected. This will continue to happen.

6) Finally, analysis was limited to a SLR of 36", a rate of rise of 3-6"/year, and a timeframe of 2075-2100. Although SLR will continue indefinitely, this frame was chosen to provide more familiar sidebars for planners and the public. However, future analyses should consider a broader range of conditions. (Executive Summary, p. 11, emphasis added.)

These assumptions have taken options off the table that are far more environmentally benign. Assumption #2 above is especially concerning, as it confirms that Caltrans is considering a "retreat inland" strategy for another environmentally sensitive corridor, Highway 1. Significantly, that strategy is expected to be less expensive.

In addition, the predictions used for sea level rise are on the low end of scientifically credible projections, due to recent unexpected warming. The April 2017 publication of [Rising Seas in California: An Update on Sea-Level Rise Science](#) by the California Ocean Science Trust provides more current projections on page 26. In particular, the maximum 2010 projections are significantly higher.



Given the fact that no serious study has been made of a "retreat inland" strategy, or of bringing passenger rail to this corridor, it is premature to move forward with the long-term elements of the proposed Corridor Plan.

### Caltrans' Planning

The 2015 Transportation Concept Report for State Route 37 (TCR) had several major flaws. First, it took a tunnel vision approach, seeing the problems as only involving transportation, and entirely ignoring the transportation-land use connection. Second, it completely ignored the cause of sea level rise: increasing levels of greenhouse gases (GHGs). Because the largest source of GHGs in California is motor vehicles, the project's primary purpose of adding capacity for more vehicles will exacerbate SLR. It is the height of unprofessionalism for Caltrans to have ignored this inconsistency with the state's climate policies pertaining to reducing GHG emissions and VMT. On a closely related subject, Caltrans is mistaken:

There is concern that increasing the number of lanes on any facility creates only temporary congestion relief and in the long run will result in additional travel demand. In the case of SR 37, because of the local geography and environment, the lack of population centers and very limited development along the corridor, building out Segment B to conform to Segments A and C is not expected to significantly increase demand, and could allow HOV/ transit options to be introduced in the corridor. (TCR, p. 25.)

It is clear that the TCR authors do not understand induced demand. The demographic projections for the North Bay are unconstrained by transportation capacity. The issue of concern is not development along Highway 37--it is the development at either end. The 81% projected increase in WB AADT and 76% increase in EB AADT (TCR, p. 15) simply **cannot** occur if the highway is not widened. If land use policies changed, or a new commitment was made to public transit in response to climate change, the increase in travel demand would not occur, altering the Project Purpose and Need.

The Summary of Key Issues and Strategies included: "Origin/destination data is a first step to determine transit demand." (TCR, p. 27.) Such a study was not performed for the Corridor Plan, however.

### Critique of the Corridor Plan

1. TRANSDEF believes that ongoing traffic congestion is the the motivation to "do something" about Highway 37, despite efforts to characterize the project as sea level rise mitigation. However, considering the Highway 37 problem to be a transportation problem is a misdiagnosis. The current traffic congestion is the direct result of a jobs-housing imbalance, caused by a failure of local and regional planning. A transportation "solution" for this problem would only be addressing the symptoms and not the causes of the problem. This is a formula for long-term failure.

2. The analysis of a Retreat strategy was half-baked. Whether future traffic could fit on existing alternate roadways (p. 15) was the only consideration given to a Retreat alternative that would avoid spending many billions of dollars to construct a new causeway across the wetlands. This is insulting to the intelligence of readers of the study, and damning proof that no serious effort was made to consider an alternative. Spending far less money to upgrade SR 116 and SR 12 to freeway status connecting Hwy 101 to I-80 is an alternative that must be evaluated.

3. The reasons given for rejecting a rail alternative (p. 15) do not stand up to scrutiny:

(a). While a rail route might be longer than the existing roadway, it is untrue that travel times would necessarily be longer. Because rail vehicles do not suffer congestion on their own ROW, travel would be much faster than congested road travel (the appropriate comparison, given that congestion is the driver for this project). Second, a rail vehicle on dry land would provide far more reliable travel than a roadway subject to periodic inundation.

(b). The cost projections are grossly out of proportion to recent commuter rail projects. They are closer to BART costs than commuter rail. The final Corridor Plan must provide an appendix documenting the estimates, if they are to be given any credibility. A highway toll should be imposed to fund a rail project and provide a cost differential to induce transit use by drivers. Excerpts of the draft State Rail Plan (See attachment) propose to study and possibly build passenger rail in this corridor. The Corridor Plan should fully support the State Rail Plan proposals.

(c). While portions of the rail alignment do have flooding vulnerabilities, it is far less costly to raise tracks than raise a roadway. It is entirely untrue that " Additionally, there is no real advantage of a rail alternative over roadway improvements in this segment in terms of environmental impacts." (p. 16.) First, the rail ROW is largely not in wetlands. Second, a well-used rail line will have the environmental benefit of reducing GHG emissions, while an expanded roadway will significantly increase GHG emissions. The only reason this false statement could have been put into the Plan is the refusal of highway interests to acknowledge the GHG emissions impact of highway widening.

4. Improved lane drop at SR 121: A major constraint on the flow of traffic in Segment B is the traffic light at SR 121. The roundabout plan, with EB bypass (pp. 23 & 29) would significantly increase the throughput of the intersection, if it can be feasibly constructed while under traffic.

5. Express bus service between transit hubs would be a desirable near-term addition to the corridor.

6. TRANSDEF would support the following near-term solution, if paired with a state-level commitment to fund passenger rail service in the corridor: A movable barrier to replace the existing fixed median barrier would allow SR 37 to return to its former 3-lane configuration without requiring any additional ROW. Since the travel demand is highly

directional, a movable barrier would provide capacity roughly equivalent to a 4-lane system, at a far lower cost and with fewer environmental impacts. The reversible center lane would be restricted to HOVs. A toll would be charged for all lanes.

7. As stated earlier, it is far too early to commit to a long-range plan, when less costly and less impactful alternatives have not been adequately explored. The Next Steps proposed on page 31 are thus inappropriate, for the reasons discussed above.

Thank you for this opportunity to comment on the draft Corridor Plan.

Sincerely,

/s/ DAVID SCHONBRUNN

David Schonbrunn,  
President

Attachment: State Rail Plan Excerpts

The Highway 37 corridor is identified for consideration for future passenger rail service in the draft 2017 State Rail Plan (SRP):

For the short term:

Evaluate expansion of rail service from San Rafael, Sonoma, and Napa Counties to Solano County, considering rail service primarily on existing rail alignments with potential connections to the statewide network at Fairfield-Suisun or near Vallejo. (SRP, p. 130.)

In the mid-term:

Implementation planning for a connection from Marin and Napa Counties to the state network at a Solano County hub, based on the results of the 2022 evaluation. (SRP, p. 138.)

In the long-term:

Hourly service between a Solano County Hub and Novato, providing timed connections to service between Cloverdale and Larkspur, or through service to Marin or Sonoma Counties.

Hourly service between Napa and the Solano County Hub, providing connection between Napa County and the State rail network. (SRP, p. 146.)