

Transportation Solutions Defense and Education Fund

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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 2100 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 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.)