



# SIERRA CLUB

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October 13, 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 Draft Corridor Improvement Plan

Dear Mr. Rabbitt—

On behalf of the Sierra Club's Redwood and San Francisco Bay chapters, we submit the attached comments and observations concerning environmental impacts of the Draft Corridor Improvement Plan prepared by the consultants, Kimley/Horn. We appreciate that the plan recognizes the need for immediate, low-cost improvements to the existing 2-lane section of highway between Sears Point and Mare Island. However, we are concerned that the suggested early measures would fail to promote car-pooling, van-pools, and public transportation, which are essential to minimize tailpipe emissions in the corridor.

Measures such as queue jumps and lane-management signage or metering lights can encourage commuters to ride-share, and enable express buses to divert reasonable numbers of riders from single-occupant vehicles. If the lane-drops at Sears Point and Mare Island are designed to favor car-pools, van-pools and express buses over single-occupant vehicles, emissions, vehicle miles traveled, and congestion could all be limited. Experience shows that the mere addition of a traffic lane fails to erase a bottleneck for very long; usually, more people are

induced to drive alone, and peak-hour traffic delay remains as serious as before.<sup>1</sup> In this case, new pavement could simply move the existing morning congestion a few miles toward Novato, without shortening travel time for most drivers.

Because the SR-37 plan has a horizon beyond the year 2030, it must also begin to address the development of all modes of public transportation; it should not focus primarily on motor vehicles. Because population growth is expected to continue, the plan should also establish the foundation for ferry and rail services. Corridor planning must consider multi-modal options, especially when nearby transit systems exist, such as in Solano and Marin Counties; it should not be limited to roads alone.<sup>2</sup>

Finally, the analysis must consider whether the low-income families that currently use the highway could pay significant tolls. The effects of options to address this issue will affect the financial analysis and should not be omitted from the corridor plan.

We thank you and members of the Policy Committee for your deliberative approach to issues affecting this corridor. We understand that the consultant intends to meet with environmental groups later this month, and Sierra Club representatives hope to be able to elaborate on the wetlands, public access, air quality, and noise issues at that time. If you have questions concerning our recommendations, please contact Steve Birdlebough (707) 576-6632 [scbaffirm@gmail.com](mailto:scbaffirm@gmail.com) or Joseph Green-Heffern (707) 207-37027 [jm.greenheffern@gmail.com](mailto:jm.greenheffern@gmail.com)

Sincerely,



Victoria Brandon, Chair  
Redwood Chapter



Igor Tregub, Chair  
SF Bay Chapter

cc: Policy Committee members  
MTC and Transportation Authority Staff

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<sup>1</sup> See, Handy, *Increasing Highway Capacity Unlikely to reduce Congestion*  
[http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST\\_Brief\\_InducedTravel\\_CS6\\_v3.pdf](http://www.dot.ca.gov/research/researchreports/reports/2015/10-12-2015-NCST_Brief_InducedTravel_CS6_v3.pdf)

<sup>2</sup> See, e.g. Transportation Research Board, *Guidebook for Corridor-Based Statewide Transportation Planning* (2010), pp. 57-59.

## SIERRA CLUB 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 including fault zones and liquefaction risk is known.

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 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. Also, address the equity issues presented by low-income families that would not be able to afford tolls.