



SPUR

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November 1, 2018

Metropolitan Transportation Commission
Jake Mackenzie, Chair
375 Beale St.
San Francisco, CA 94105

Highway 37 Policy Committee
David Rabbitt, Chair
575 Administration Drive, Room 100A
Santa Rosa, CA 95403

Re: Highway 37 planning, alignment and design considerations

Dear Mr. Mackenzie and Mr. Rabbitt:

SPUR appreciates the opportunity to comment on design alternatives and planning for Highway 37, currently being studied by Caltrans, the Highway 37 Policy Committee, and MTC. SPUR is a member-supported nonprofit organization dedicated to good planning and good government in the San Francisco Bay Area. For decades, SPUR has participated in and supported key ideas and projects that have improved both mobility and sustainability in the region. Now funded by a once-in-a-generation commitment of resources dedicated under RM3 (among other sources), Highway 37 presents us with a unique opportunity to remake an important regional corridor in a way that solves for both.

In forming the recommendations in this letter, SPUR has consulted with staff from MTC, the Coastal Conservancy, SFEI, the Sonoma Land Trust, reviewed the SR 37 Corridor Plan, and reviewed comments provided to you by the Regional Water Board earlier this year. SPUR's Regional Planning and Transportation Policy Board heard from MTC and Conservancy staff and held a long discussion about the future of Highway 37 at our August meeting.

First, we commend all the agencies engaged in land use and transportation planning in the 37 corridor for their engagement and commitment to working with each other. Between 101 and Interstate 80, Highway 37 crosses four counties and one of the largest contiguous Baylands-adjacent open spaces in the region. This presents a governance challenge. But we heard that conservation groups, Caltrans, and MTC are committed to working with one another on a design solution for the corridor that helps protect valuable marsh land, open space, and transition zones needed to buffer urbanized areas from sea level rise – AND that reduces congestion and adds transportation options for people who travel through the corridor. We encourage all agencies to continue working together in the spirit of moving forward a design solution that benefits both of these important policy objectives. This is a chance for innovation and a learning opportunity for future resilience projects.

Second, we recommend evaluating and considering a range of design alternatives for the corridor that achieve the following:

- 1. Plan conservatively for sea level rise.** SPUR has been participating in the regional sea level rise conversation since 2009, and with each passing year we understand more about our inundated future and what design options we have. This year, the state Ocean Protection Council issued new guidelines for a risk-based approach to planning for sea level rise that should be incorporated into any new design for Highway 37. Under OPC's guidance, projects with high risk-aversion and intolerance for flooding – including major transportation corridors – should plan for a range of sea level rise in 2100 between 5.5-10 feet. Of course, sea level rise will continue long after that. To minimize impacts of flooding on travelers for the next 50+ years, while allowing Baylands restoration to the fullest extent possible, we recommend a design approach that elevates 37 above a conservatively-projected future sea level rise. We believe the Regional Water Board recommended a similarly risk-averse approach as a way of protecting the state's significant transportation and wetland restoration investments in this area.
- 2. Develop a corridor-wide vision before evaluating alternatives by segment.** We understand that for the purpose of planning, Highway 37 has been 'broken' into three segments (A, B, and C). While potentially useful for understanding and calculating engineering and design alternatives, this segmentation could also potentially obfuscate and stymie a regional solution. For example, widening one segment without elevating it, or lifting only one segment out of a flood pathway, could foreclose on design options that could both maximize public objectives and save money by thinking through long-term adaptation planning. We encourage all the partners to first develop a corridor- wide vision and only then to focus on segments; we should not let the tail wag the dog.
- 3. Plan to add multi-modal transportation options, but don't study each independently.** Infrastructure sizing and design should be based on estimates of future, not just current, uses and needs in the corridor. Are land uses, housing, and jobs expected to change much in the communities served by 37 over the next 50+ years? How do we know that committing to an auto-only investment will best serve the region in this area? Ferry, rail, bus rapid transit, buses, bicycling, e-scooters, and walking are all potential ways to access sites and places along and across 37, but these modes must be planned for simultaneously to effectively gauge and meet demand. We understand that SMART is studying rail potential, and the Solano Transportation Agency is studying ferries. MTC and partners should conduct for Hwy 37 something similar to MTC's Core Capacity study, which planned for multiple modes – and future demand for them - within the Bay Bridge corridor. The 37 planning team should consider these ideas, potentially changing and densifying land uses, and the future of transportation technology as it sizes up who this investment will be for, and how people could need it to work differently in the future. It is critical that the transportation planning process focus on the ingredients for multi-modal transportation success: service quality, customer experience, connectivity, land use.

4. **Act with urgency to bring tidal action back to formerly diked Baylands - and embrace the potential for large-scale marsh restoration.** The Baylands Ecosystem Habitat Goals project not only identified that we have lost more than 90% of San Francisco Bay's original tidal wetlands, but found that we must restore 100,000 acres by 2030 in order to have a healthy Bay that can keep up with sea level rise. This is an urgent challenge that redesigning Hwy 37 can help us address. If 37 were raised to a causeway, for example (and necessary land acquisitions are made), tidal action could be restored to many acres of currently diked and drained wetlands.
5. **Develop a regional strategy for transportation infrastructure vulnerable to sea level rise, and consider land use and population served as criteria for prioritizing resources.** Highway 37 is not the only road, or Bay crossing, that faces near term flooding and future long-term inundation without redesign. But it is far less utilized than other major regional corridors at risk, such as Highway 80 and Highway 101. Going forward, we will need to invest public funds in retrofitting much of this transportation infrastructure, and we must identify and prioritize those assets that are most critical to regional mobility. To make the business case for prioritizing 37, the communities it most closely serves should demonstrate their investment in the region by adding housing and jobs. Transportation infrastructure investment, a limited resource, should follow and serve land uses - not the other way around. Petaluma, Novato, Vallejo, American Canyon, Napa, and other North Bay cities should identify ways to add housing that alleviates the region's housing crisis while adding people and jobs who will benefit from improved mobility and flood protection in the 37 corridor.
6. **Include Highway 37 in MTC's Bay Crossings study.** Functionally, Highway 37 is another transbay/bridge corridor in the region. Each bridge corridor provides redundancy for the others, and supports critical east-west mobility, in the event of short-term or long-term outages or disruptions. MTC's Bay Crossings study should include Highway 37 to understand its importance as a transportation corridor from a resilience and mobility perspective today, and to plan for its role serving those functions in the future.

Thank you once again for the opportunity to comment on the planning process for the 37 corridor. We are encouraged that the partners are working together and committed to investing in a solution that helps alleviate congestion, save the Bay, and make the Bay Area more resilient and a better place to live. If you have any questions or concerns about these comments, don't hesitate to contact us: ltam@spur.org and ramin@spur.org.

Sincerely,



Laura Tam
Sustainable Development Policy Director



Ratna Amin
Transportation Policy Director