



“ONE CORRIDOR, ONE TEAM, MANY SOLUTIONS.”

May 8, 2023

Lee Ann Eager, Chair
California Transportation Commission
1120 N Street, MS 52
Sacramento, CA 95814

RE: Support for the Bay Area Infrastructure Financing Authority request for tolling authority on State Route 37

Dear Chair Eager:

The five Metropolitan Transportation Commissioners representing the North Bay counties of Solano, Napa, Sonoma, and Marin write to you in support of the Bay Area Infrastructure Financing Authority (BAIFA) request for tolling authority on State Route (SR) 37 between Sears Point and Mare Island as allowed under Section 149.7 of the California Streets and Highways Code, as amended by AB 194 (2015).

SR 37 is a vital transportation corridor in the North Bay and functions as an important emergency evacuation route. This route provides a critical east-west freight connection between two major trade corridors and runs through the ecologically rich San Pablo Baylands. Climate change-fueled storms periodically flood the route and, by 2050, portions of SR 37 are projected to be permanently inundated due to the impacts of sea level rise. Pollution from idling vehicles also contributes to climate related impacts and threaten the sensitive Baylands habitat nearby. SR 37 is also one of the Bay Area's most congested corridors in terms of vehicle delay. Under optimal conditions, it takes 20 minutes to travel on SR 37 between SR 29 and US 101. However, due to a lack of capacity and transit options, travel times along the corridor are forecast to be 100 minutes by 2025 during peak periods. The future of this corridor demands finding solutions to chronic traffic congestion and periodic flooding. But it will also require balancing transportation needs with protecting and enhancing sensitive marshland habitats.

The Sears Point to Mare Island Improvement Project is a component of the Resilient State Route 37 program, a suite of near-term and long-term improvements to preserve and protect the SR 37 corridor, enhance quality of life, and support ecological restoration, including through using natural infrastructure to enhance corridor resilience. BAIFA and Caltrans, in partnership with the four North Bay County Transportation Agencies, are implementing corridor improvements to improve traffic flow and peak travel times, increase vehicle occupancy, enhance residents' quality of life, improve freight throughput, support multimodal travel, improve safety and public access, preserve and protect surrounding ecosystems, and improve corridor resilience against flooding in the near term. These improvements include converting the existing general purposes lanes to High Occupancy Vehicle lanes, adding one tolled general purpose lane in each direction, providing corridor-wide Intelligent Transportation Systems, new signs and lighting, California Highway Patrol observation areas, maintenance vehicle pullout areas, new traffic signals at Noble Road and intersection modifications at SR 121, slope protection and reinforcement, environmental and public access enhancements, and introducing new transit service between Solano County and Marin County.

Means-based tolling is needed to both mitigate Vehicle Miles Traveled (VMT) and generate funding to advance the near- and long-term Resilient SR 37 program. The toll revenue will be utilized to advance activities that support resiliency to sea-level rise, protect critical marsh and tidal habitats, reduce transportation inequities, and incorporate bicycle, pedestrian, transit, and carpool options for travelers. At the same time, we understand that there may be community questions about the toll rates; we'd like to restate our commitment to working with BAIFA as well as the other corridor partners to ensure that a low-income toll discount option is provided. Planning a long-term solution presents an opportunity to provide bicycle, pedestrian, transit, and carpool options for all travelers.

As MTC Commissioners we value our partnership with the State and support authorizing innovative tools to ensure we protect and enhance the SR37 corridor such that we help deliver on the equity and mobility goals envisioned for the region. The proposed project will help reduce greenhouse gas emissions, improve safety and quality of life, and improve access to equity priority communities. We fully support the request to the CTC for tolling authority for the SR 37 corridor and thank you for your consideration of this critical project.

Sincerely,



[Alfredo Pedroza \(May 9, 2023 14:55 PDT\)](#)

Alfredo Pedroza

MTC Commissioner, Napa County



[James Spering \(May 10, 2023 06:10 PDT\)](#)

Jim Spering

MTC Commissioner, Solano County



[Stephanie Moulton-Peters \(May 11, 2023 11:53 PDT\)](#)

Stephanie Moulton Peters

MTC Commissioner, Marin County



[Victoria Fleming \(May 12, 2023 14:20 PDT\)](#)

Victoria Fleming

MTC Commissioner, Sonoma County



[David Rabbitt \(May 13, 2023 08:00 PDT\)](#)

David Rabbitt

MTC Commissioner, ABAG and Sonoma County

CC: Dina El-Tawansy, Caltrans District 4
Andrew Fremier, MTC

From: [Robert Mota](#)
To: California.Transportation.Commission@CATC
Cc: Taylor.Tanisha@CATC
Subject: Fwd: Tolls Lanes on State Route 37
Date: Sunday, May 14, 2023 1:29:57 PM

EXTERNAL EMAIL. Links/attachments may not be safe.

Dear Commissioners,

Thank you for your consideration on this matter. As a resident of the Bay Area, I am opposed to the implementation of HOV and toll lanes on State Route 37.

The road in question was originally a private toll road when it was purchased by Caltrans. When the state purchased it, it became a free public roadway. The argument that this roadway was always intended for tolling is patently false.

Adding HOV and tolls will only make commuting harder for hard working people who already struggle with long commutes and high costs. The people of California are already struggling with high costs and long commutes—adding tolls will only make things worse. These commuters will be forced to take alternate routes through Napa County in order to avoid paying tolls on State Route 37. This will increase traffic congestion in that area while simultaneously decreasing safety.

Although I understand MTC and Caltrans would implement reduced tolls as an equity measure, let's face it that this would just add another burden to low-income workers having to log online and jump through bureaucratic hurdles. MTC's pockets are deep enough that there are better alternatives to tolling.

While I fully support the expansion of State Route 37, I urge you to find alternative funding sources such as gas taxes or federal taxes before imposing additional fees on Californians.

Thank you,
Robert D. Mota

PS The recent editorial in the Marin IJ about this topic says it better than I could. Please read it.

From: [Nancy Sheppard](#)
To: [California Transportation Commission@CATC](mailto:California.Transportation.Commission@CATC)
Subject: Support toll road on RT. 37
Date: Saturday, May 13, 2023 10:34:40 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

I support a toll road on Route 37. I am in process of moving to Napa and support this concept. The traffic between 101 and Sears Point is backed up because of those going to Vallejo. We need a solution to the backup and this is reasonable.

Nancy Sheppard
Larkspur, CA

From: [dwaldt1](#)
To: [California Transportation Commission@CATC](mailto:California.Transportation.Commission@CATC)
Subject: NO TOLL FOR HWY 37!!
Date: Monday, May 15, 2023 10:27:19 AM

EXTERNAL EMAIL. Links/attachments may not be safe.

No way should a toll road be CTCs first consideration for funding improvements on Hwy 37.
So many of Marin & Sonoma counties' faithful & hardworking employees commute from more-affordable Solano County (of whom the majority work in unskilled/lower-paying jobs in Marin). To impose thousands more dollars on them just to get to/from their jobs is just CRUEL & UNFAIR.
Fund the improvements some other way, a sales tax even.
BUT NO TOLL ON HWY 37!!

To: Each Member of the California Transportation Commission
From: Sierra Club, Redwood Chapter Transportation Chair, Stephen Birdlebough
Re: State Route 37 Toll Facility Project (Tabs 17 & 18)
Date: May 15, 2023

For many years, the Sierra Club has participated in the effort to develop an environmentally sound and equitable plan to cope with the challenges to Highway 37, where it crosses the marshes between the cities of Vallejo and Novato. The Sierra Club is concerned that the Toll Facility Project, as described in the Application For Tolling Authority (ATA), would damage the environment, fail to reduce congestion, and be inequitable. A corrected ATA should be required

Environmental Issues:

The ATA proposes to fund a nine-mile road-widening project that would result in more driving, without any allocation of funds to establish and operate an express bus service. As was described during the recent joint meeting of the CTC and the Air Resources Board (ARB), California's path to carbon neutrality requires us all to drive less. The ARB Scoping Plan Calls for an average 25% reduction in driving by the year 2030, and a 30% reduction by 2045. (ARB Scoping Plan, Appendix E, p. 4*). Any road-widening should be limited to that essential to give express bus service and carpools priority in reaching the 2-lane roadway, where traffic usually moves at speeds of 35-MPH to 60-MPH.

The Sierra Club is also concerned that an investment of hundreds of millions of dollars in a project that fails to elevate the roadway would constrain needed water flows and transfers of sediment into the marshes north of the highway. It is unnecessary to widen more than a few miles of the highway at the western end of the 2-lane road segment to give priority to buses and car-pools. Extension of the eastbound lane-drop could be on an elevated bridge/causeway that would reduce the overall cost of adapting SR-37 to sea level rise.

Continued Congestion:

The ATA acknowledges that an added traffic lane would invite more people to make long commutes. Figure 2 of the ATA (below) also shows that the Project would only move the "bottleneck" for most of the morning traffic from Mare Island to the 101 Interchange. Only the vehicles headed for SR-121 and Lakeville Highway would see reductions in delay. The estimated value of time-savings for commuters fails to recognize this factor, and if corrected, would not justify an expenditure of hundreds of millions of dollars.

Preservation of most of the single lane road in each direction, with priority for express buses and carpools, could reduce the number of single-occupant vehicles on the highway. An extension of the east-bound lane drop to Solano Creek would suffice to minimize the afternoon congestion. (See the attached Induced Demand Fact Sheet and the Sierra Club's SR-37 Restructuring Statement.)

Equity Issues:

The ATA proposes a toll that would add to the financial burdens of people who have been prevented from living closer to work by decades of exclusionary housing policies. It does not provide for the more well-to-do people who commute from the Sonoma Valley to Marin County to pay a toll to help fund construction of the proposed causeway between Atherton Avenue and the Highway 101 Interchange.**

Also, the ATA does not make any commitment to grant toll discounts to motorists that are in poverty. There is only a statement that, "An equity program will be evaluated...." (p. 23 et al.) The toll proposed by SB 1050 (Dodd-2022) specified tolls of 25% to 50% for low-income drivers; any toll plan should have similar specificity.

If you or your staff have questions concerning these issues, please contact us at scbaffirm@gmail.com or 707-576-6632.

We recommend that action on the ATA be delayed until the above issues can be corrected.

* <https://ww2.arb.ca.gov/sites/default/files/2022-11/2022-sp-appendix-e-sustainable-and-equitable-communities.pdf>

** The ATA's description of the project area is internally inconsistent. In some places it refers to the "Project" as the entire length between Mare Island and Novato (Figures 1 and 2, pp. 11 & 12, "Project Study Area") and in other places only the segment between Mare Island and Sears Point (Figure 3, p. 18, "Project Location"). This conflation of project areas allows the Applicant to claim endorsement of the current proposal from a broad spectrum of agencies, public officials, and the public (page 36 ff., "Community/Stakeholder Support"), many of whom may not have even seen the Application. Some of Representative Huffman's major concerns are not addressed, including the danger of this temporary fix becoming permanent. Community input to CalTrans' Draft EIR of 2022, including concerns about tolls' impact on lower income people, is not detailed.



State Route 37 Restructuring

The environmental community and Caltrans have been working to restructure State Route 37 between Vallejo and Marin County for nearly a decade. The scarcity of affordable housing along the Highway 101 Corridor has led to such heavy commute traffic on the 21-mile-long highway between Vallejo and Novato that unacceptable levels of congestion occur on a daily basis. Also, parts of the highway are barely above sea level, and increasingly affected by flooding as sea level rises. The Sierra Club recognizes the importance of offering commuters better travel options, and the need to raise the highway to causeways that will provide unimpeded movement of Bay water across the right-of-way.

However, rather than proceeding with causeway projects for the nine-mile right of way between Sears Point and Mare Island, "Interim" highway widening has been proposed. Such a project is likely to impair flows of water to significant parts of the San Pablo Bay wetlands during the "interim." More significantly, widening the existing highway could become a permanent substitute for causeway construction. As sea level gradually rises, it might seem easier, cheaper, and faster to elevate the roadway a few inches at a time to keep it from going under water. The road would become a barrier, interfering with tidal flows across the right-of way.

We think it highly imprudent to invest many millions of dollars and destroy acres of wetlands, to widen a few miles of a road that is threatened by flooding during storms and is certain to experience more frequent "100-year floods" in the future. It is far preferable to address the inevitability of sea level rise from the outset, and to use available resources responsibly by beginning phased construction of the ultimate project, starting with modifications to the Tolay Creek bridge, and aiming for completion of the entire 21-mile project earlier than the current 2036 target year.

The highway bisects and impairs the San Pablo Bay National Wildlife Refuge and other bay lands that have constituted one of the largest tidal wetlands on the west coast. Elevation of the highway to a causeway can reconnect this wetland complex to the Bay waters, initiating nature-based solutions to avoid some of the worst effects of the expected minimum 3.5-foot rise in sea levels by 2050. Wetlands sequester carbon dioxide and encourage biodiversity by increasing ecologically vital habitat. They play a crucial role in meeting the State's 30 by 30 goals. Elevating the highway may also increase climate resilience for North Bay communities by allowing more sediment flow into San Pablo Bay to protect marshes and communities against sea level rise. Improvements to SR-37 must be evaluated in the context of these critical environmental objectives.

A resilient SR-37 corridor must also contribute to the reduction of greenhouse gas emissions that are produced by long-distance commutes. Statewide, reductions in single-occupant vehicle trips, more housing close to jobs, and more jobs close to housing are needed to reduce the number of long-distance commutes that now drive much of the climate crisis. The SR-37 corridor is no exception, but the huge difference in housing costs between upscale Marin- Sonoma counties, and comparatively affordable Solano-Napa counties call for public transit alternatives that will help reduce the number of people driving 50 miles per day.

At present, there is NO public transit between Vallejo and Marin County! A near-term solution is for Solano Transit to provide convenient, economical express bus service, and a long-term solution is likely to include passenger rail service. Bus service is currently being studied, but the buses will need to bypass the slow-moving cars and trucks that are working their way toward the two-lane stretch of road between Mare Island and Sears Point, which operates at speeds up to 45 miles per hour.

The addition of diamond lanes at both ends of the two-lane segment of the existing roadway would enable buses, as well as vanpools, and car-pools to bypass the slow-moving single-occupant vehicles. Road-space for such bypass lanes is already available at the east end of the two-lane segment of highway. However, there is little road-space for a shared vehicle bypass between the Highway 121 intersection and the two-lane highway bridge over Tolay Creek. This road-space can be provided by prioritizing construction of a causeway/bridge from Sears Point to the Sonoma River; the causeway would have an east-bound diamond lane to give express buses and car-pools priority over single-occupant vehicles during afternoon peak traffic hours.

An important advantage of a shared vehicle bypass is that it gives commuters who use an express bus, vanpool, or car-pool a substantial time-saving advantage, and visibly reminds those in single-occupant vehicles of that advantage, thus providing a strong incentive to cease driving alone. We have known for more than a decade that, in addition to shifting drivers into electric vehicles, we must reduce the number of single-occupant vehicles on the road to deal with the climate crisis.

Through the recent PEL process, project design alternatives and accompanying stakeholder input indicate that a multiple-benefit, multi-modal, built-for-resilience causeway would best meet long term objectives, enjoy broad public, political and environmental support, and qualify for several significant public funding sources, including state and federal funding for environmental protection, resiliency and expanding and improving rail service.

Furthermore, it has long been demonstrated that road widening does not reduce congestion, an objective that instead depends largely on giving commuters access to van-pools and high-quality transit rather than driving in single-occupancy vehicles.

All these decisions must also be approached through an equity lens. Although tolling may prove to be inevitable, it is neither inevitable nor equitable to place the primary financial

burden on comparatively disadvantaged commuters from Solano County who make up most of the daily traffic, especially during peak hours, and to expect the affluent communities of Marin and Sonoma Counties who benefit from their services to pay nothing. Nor would it be equitable to impose a toll merely on the eastern segment of the highway, burdening Solano-Napa county residents while Sonoma Valley drivers have free access. Imposition of tolling could be acceptable only if it applies to the entire highway and is accompanied by substantial low-income discounts for both tolls and transit. The MTC Clipper Card already provides a precedent.

We support MTC’s desire to improve Highway 37, but this must be done in a way that is cost-effective, durable, environmentally sound, and equitable. An outdated conventional highway widening project will impede rather than further the imperatives of climate resiliency.



Potential SR 37 Ultimate Project Limits

Section ID	County	Section Limits	Rationale
1	Marin	US-101/SR 37 Interchange	Interchange and Access Road Improvements
2	Marin	US-101 to Atherton Avenue (SR 37 Flood Reduction Project)	Long Stretch of Causeway
3	Marin	Atherton Avenue to Petaluma River Bridge	Embankment / At Grade, Access Issues
4	Marin/Sonoma	Petaluma River Bridge to East of San Pablo Bay National Wildlife Refuge Headquarters	Long Stretch of Causeway
5	Sonoma	San Pablo Bay National Wildlife Refuge Headquarters to SR 37/SR 121 Interchange at Sears Point	Long Stretch of Embankment /At Grade/
6	Sonoma	SR 37 /SR 121 Interchange at Sears Point	Interchange Improvements
7	Sonoma/Solano	SR 37/SR 121 Interchange to SR 37/Walnut Avenue Interchange at Mare Island	Long Stretch of Causeway ₂
8	Solano	SR 37/Walnut Avenue Interchange at Mare Island to I-80	Causeway and Coordination of Multiple Interchanges



Increasing Highway Capacity Unlikely to Relieve Traffic Congestion

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POLICY BRIEF

Issue

Reducing traffic congestion is often proposed as a solution for improving fuel efficiency and reducing greenhouse gas (GHG) emissions. Traffic congestion has traditionally been addressed by adding additional roadway capacity via constructing entirely new roadways, adding additional lanes to existing roadways, or upgrading existing highways to controlled-access freeways. Numerous studies have examined the effectiveness of this approach and consistently show that adding capacity to roadways fails to alleviate congestion for long because it actually increases vehicle miles traveled (VMT).

An increase in VMT attributable to increases in roadway capacity where congestion is present is called “induced travel”. The basic economic principles of supply and demand explain this phenomenon: adding capacity decreases travel time, in effect lowering the “price” of driving; and when prices go down, the quantity of driving goes up.¹ Induced travel counteracts the effectiveness of capacity expansion as a strategy for alleviating traffic congestion and offsets in part or in whole reductions in GHG emissions that would result from reduced congestion.

Key Research Findings

The quality of the evidence linking highway capacity expansion to increased VMT is high. All studies reviewed used time-series data and sophisticated econometric techniques to estimate the effect of increased capacity on congestion and VMT. All studies also controlled for other factors that might also affect VMT, including population growth, increases in income, other demographic factors, and changes in transit service.²

Increased roadway capacity induces additional VMT in the short-run and even more VMT in the long-run. A capacity expansion of 10% is likely to increase VMT by 3% to 6% in the short-run and 6% to 10% in the long-run. Increased capacity can lead to increased VMT in the short-run in several ways: if people shift from other modes to driving, if drivers make longer trips (by choosing longer routes and/or more distant destinations), or if drivers make more frequent trips.^{3,4,5} Longer-term effects may also occur if households and businesses move to more distant locations or if development patterns become more dispersed in response to the capacity increase. One study concludes that the full impact of capacity expansion on VMT materializes within five years⁶ and another concludes that the full effect takes as long as 10 years.⁷

Capacity expansion leads to a net increase in VMT, not simply a shifting of VMT from one road to another. Some argue that increased capacity does not generate new VMT but rather that drivers simply shift from slower and more congested roads to the new or newly expanded roadway. Evidence does not support this argument. One study found “no conclusive evidence that increases in state highway lane-miles have affected traffic on other roads”⁸ while a more recent study concluded that “increasing lane kilometers for one type of road diverts little traffic from other types of roads”.⁹

Increases in GHG emissions attributable to capacity expansion are substantial. One study predicted that the growth in VMT attributable to increased lane miles would produce an additional 43 million metric tons of CO₂ emissions in 2012 nationwide.¹⁰

Capacity expansion does not increase employment or other economic activity. Economic development and job creation are often cited as compelling reasons for expanding the capacity of roadways. However, most studies of the impact of capacity expansion on development in a metropolitan region find no net increase in employment or other economic activity, though investments do influence where within a region development occurs.^{11, 12}

Conversely, reductions in roadway capacity tend to produce social and economic benefits without worsening traffic congestion. The removal of elevated freeway segments in San Francisco coupled with improvements to the at-grade Embarcadero and Octavia Boulevards has sparked an on-going revitalization of the surrounding areas while producing a significant drop in traffic.¹³ Many cities in Europe have adopted the strategy of closing streets

in the central business district to vehicle traffic as an approach to economic revitalization,¹⁴ and this strategy is increasingly being adopted in cities the U.S., from New York City to San Francisco.

Further Reading

This policy brief is drawn from the “Impact of Highway Capacity and Induced Travel on Passenger Vehicle Use and Greenhouse Gas Emissions” policy brief and technical background memo prepared for the California Air Resources Board (CARB) by Susan Handy (University of California, Davis) and Marlon Boarnet (University of Southern California), which can be found on CARB’s website along with briefs and memos on 22 other land use and transportation strategies that impact vehicle use and GHG emissions. Website link: <http://arb.ca.gov/cc/sb375/policies/policies.htm>

¹ Noland, R.B. and L.L. Lem. (2002). A review of the evidence for induced travel and changes in transportation and environmental policy in the US and the UK. *Transportation Research D*, 7, 1-26. <http://bit.ly/1jZbl1E>

² Noland, R.B. and L.L. Lem. (2002).

³ Noland, R.B. and L.L. Lem. (2002).

⁴ Gorham, R. (2009). Demystifying Induced Travel Demand. Sustainable Urban Transport Document #1. Transport Policy Advisory Services on behalf of the Federal Ministry of Economic Cooperation and Development, Bonn, Germany. <http://bit.ly/1MsZHfg>

⁵ Litman, T. (2010). Generated Traffic and Induced Travel: Implications for Transport Planning. Victoria Transport Policy Institute. <http://bit.ly/1WXC258>

⁶ Hansen, M. and Y. Huang. (1997). Road Supply and Traffic in California Urban Areas. *Transportation Research A*, 31(3), 205-218. <http://bit.ly/1ZvL00k>

⁷ Duranton, G. and M.A. Turner. (2011). The Fundamental Law of Road Congestion: Evidence from US Cities. *American Economic Review*, 101, 2616-2652. <http://bit.ly/1MsZTeD>

⁸ Hansen and Huang. (1997).

⁹ Duranton and Turner. (2011).

¹⁰ Handy, S. (2005). Smart Growth and the Transportation-Land Use Connection: What Does the Research Tell us? *International Regional Science Review*, 28(2): 1-22. <http://bit.ly/1NCeeSP>

¹¹ Handy, S. (2005).

¹² Funderberg, R., H. Nixon, M. Boarnet, and G. Ferguson. (2010). New Highways and Land Use Change: Results From a Quasi-Experimental Research Design. *Transportation Research A*, 44(2): 76-98. <http://bit.ly/1LqYhfD>

¹³ Cervero, R., J. Kang, and K. Shively. (2009). From Elevated Freeways to Surface Boulevards: Neighborhood and Housing Price Impacts in San Francisco. *Journal of Urbanism*, 2(1), 31-50. <http://bit.ly/1LF8eSq>

¹⁴ Hajdu, J.C. (1988). Pedestrian Malls in West Germany: Perceptions of their Role and Stages in their Development. *Journal of the American Planning Association*, 54(3). 325-335. <http://bit.ly/1LqYnUy>

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