SR 37-Baylands Group

Baylands Group SR 37 Position Paper - July 2022

Summary: The SR 37-Baylands Group supports accelerated planning and construction of a SR 37 multi-modal, multi-benefit ultimate project on a pile-supported causeway along the current SR 37 alignment to enable timely flood risk and congestion management, along with wetland restoration. We recommend that all interim projects be low-cost, low-impact fixes or serve as initial phases of the ultimate project. Members of the Baylands Group are committed to helping the region's leaders accelerate the ultimate project and deliver long-term solutions for the North Bay as soon as possible.

The State Route (SR) 37-Baylands Group is composed of North Bay wetland land managers, ecological restoration practitioners, and other stakeholders interested in and responsible for the conservation, management, and restoration of the San Pablo Baylands. The group is committed to ensuring that, as we address North Bay infrastructure needs, the redesign of SR 37 advances the ecological restoration and conservation goals for the baylands and improves the climate resilience of the region's built and natural communities.

The SR 37-Baylands Group specific recommendations regarding SR 37 planning include the following:

1. **Build a causeway on the current alignment as the ultimate project.** The preferred solution to improve SR 37 is to transform it into a multimodal facility on a pile-supported causeway along SR 37's existing alignment between Novato and Vallejo that maintains connectivity to regional throughfares such as SR 121/12, Lakeville Highway, SR 29, and other regionally important routes. Highway redesign should include compatibility with rail, transit, bicycle, and pedestrian infrastructure redesign to the extent they together lift the transportation corridor out of the baylands to restore hydrologic connection and expand restoration opportunities in adapting to sea level rise.

2. **Start the ultimate project now to enable timely flood risk management and wetland restoration.** To achieve the desired and necessary environmental and flood risk management benefits, placement of SR 37 on a causeway must be accelerated (before rates of sea-level rise become too fast for tidal wetlands to keep pace) and paired with the decommissioning and removal of the existing SR 37 infrastructure and, if possible, the rail embankment along the Napa-Sonoma baylands' northern and western edges. Tidal restoration of diked baylands along Novato Creek, Simmons Slough, Petaluma River, Tolay Creek, and Sonoma Creek can be implemented in parallel with these improvements.

3. **Integrate, don't mitigate, to achieve efficient permitting.** Based on information provided by Caltrans, MTC, and their partners to the Baylands Group so far, the combination of (1) and (2) will likely result in a self-mitigating project that can be accelerated through environmental compliance and permitting, especially given recent and ongoing policy updates by the SF Bay Conservation and Development Commission, SF Bay Regional Water Quality Control Board, and other regulatory agencies that help "cut the green tape" and accelerate the implementation of multi-benefit climate change adaptation projects. **The SF Bay Regional Water Quality Control Board has committed to lead permit coordination of the ultimate project with the region's other regulatory agencies** (the US Army Corps of Engineers, US Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, and the San Francisco Bay Conservation and Development Commission).

4. **Any interim projects should be low-cost, low-impact fixes or serve as initial phases of the ultimate project.** To be successful, any project meant to reduce flood risk or alleviate traffic congestion before construction of the ultimate project is initiated must represent a *logical, substantial* step towards implementation of the preferred ultimate project described above in (1). Ideally, a completed Planning and Environmental Linkages (PEL) Study would be the vehicle for this phased adaptation planning and implementation.

The current federal and state governance, funding, and regulatory climate is uniquely suited to accelerate implementation of the ultimate project described above. Funding from the state budget surplus and the federal bipartisan infrastructure bill provide a once-in-a-lifetime opportunity for the North Bay to receive much-needed, multi-benefit investments that will support resilient communities, healthy environments, and robust economies. These challenges simply cannot be met by interim projects developed through the planning processes of the past. Members of the Baylands Group are committed to doing everything in their power to help obtain the funding, community support, and regulatory assurances needed to pursue the ultimate solution now.

Based on the information presented during the past five years of engagement in SR 37 planning processes, the Baylands Group has concluded that a multimodal pile-supported causeway along the existing alignment is the optimal choice as the ultimate project to support regional transportation equity, provide much-needed congestion relief, and protect against flooding from sea level rise and extreme storms over the next 100 years. We urge Caltrans, the Metropolitan Transportation Commission (MTC), and local transportation agencies to set aside the currently proposed large-scale, expensive, "interim" projects and instead initiate the ultimate project as soon as possible to take advantage of state, federal, and regulatory support for this option, as well as record levels of state and federal infrastructure funding.

The communities of the North Bay deserve nothing less. The limited lifespan and transportation benefits provided by the proposed interim projects are incredibly costly in terms of dollars, environmental impacts, construction timeline, and public/political capital; the proposed interim project between SR 121 and Mare Island does not even address sea level rise and extreme storm events. In contrast, the ultimate project will provide a superior, long-term return on taxpayer and stakeholder investment by supporting multi-modal transportation, benefitting disadvantaged communities, helping the region's communities achieve their restoration and climate adaptation goals, and accommodating a broader range of climate risks.

SR 37 Baylands Group's participation and accomplishments on SR 37 corridor planning

The Baylands Group was originally convened in 2017 in response to the acceleration of plans to redesign and rebuild SR 37 following flooding of the highway during the winter of 2016-2017. North Bay communities are already being impacted by severe storms and rising sea levels, and the best available science is clear that these impacts are expected to become more severe in the future. Specifically, if landscape-scale tidal wetland restoration in the Novato, Petaluma, and Sonoma baylands is not implemented by roughly 2030, these crucial ecosystems are unlikely to persist into the mid- to late 21st century. In addition, if SR 37 is not elevated out of the baylands, much of the highway is expected to become regularly flooded by roughly 2040. Most of the Baylands Group members are North Bay residents who understand all too well the traffic, safety, and equity challenges posed by SR 37's current configuration; we also recognize that difficult decisions must be made now to avoid making even more difficult decisions in the future.

The SR 37-Baylands Group has made significant progress toward achieving the following goals:

- **Creating and Promoting Adoption of Our Guiding Principles.** The SR 37-Baylands Group produced a white paper in 2017 that included guiding principles. These principles were incorporated into the final SR 37 Transportation and Sea Level Rise Corridor Improvement Plan released in February 2018 by Caltrans, MTC, and local transportation agencies. The principles were also used as the basis of evaluation criteria by MTC for the State Route 37 (SR 37) Resilient Corridor Program for Marin and Sonoma Counties study, which produced Design Alternatives Assessments for the segments of SR 37 running from Highway 121 to Mare Island (2019) and from Highway 101 to Highway 121 (2022). The principles were included in an adapted form in the "Purpose and Need Statement" for the Caltrans-led Planning and Environmental Linkages (PEL) Study for US 101 to I-80 (ongoing).

- **Influencing Transportation and Public Access Planning.** Members of the SR 37-Baylands Group have influenced several transportation and public access planning processes for the SR 37 corridor. Based on our input and thanks to visionary leadership at MTC, what was originally a transportation project has become the Resilient 37 Transportation Corridor Program that incorporates equity, ecology, and public access, as well as sea level rise adaptation. Baylands Group experts helped MTC identify the pile-supported causeway as having less environmental impact than a hybrid design of causeway and embankment in the State Route 37 Ultimate Sea Level Rise Resilience Design Alternatives Assessment (February 2022). This assessment also demonstrates that alternative alignments either did not meet the purpose and need or had even greater environmental impacts.

- **Developing an Ecological Landscape Vision and Implementing Restoration Projects.** There is widespread recognition in the conservation and climate adaptation communities that the flood-prone agricultural lands of the North Bay represent the largest and best opportunity in San Francisco Bay to restore "complete" tidal wetland ecosystems at a landscape-scale, with physical and ecological connectivity to terrestrial habitats that can support the landward migration of tidal wetlands in response to sea level rise, and riverine habitats that supply much-needed sediment so existing and restoring wetlands can keep pace with rising sea levels. Rebuilding the highway on an embankment or reinforcing its existing position within the baylands would disrupt this connectivity and compromise habitat restoration and climate adaptation efforts. Baylands Group members have promoted greater understanding of the need for landscape connectivity in the region, and have led the development of multiple landscape-scale strategies for habitat restoration, flood management, and public access in the San Pablo Baylands, including the Novato Creek Baylands Vision (2015), the Sonoma Creek Baylands Strategy (2020) and the Petaluma River Baylands Strategy (in-progress). Baylands Group members have previously completed significant restoration work in the Napa River Baylands and Novato Creek Baylands and are currently planning many additional acquisition and restoration projects throughout the region.

The Baylands Group and its members have committed significant resources to participating in multiple SR 37 planning efforts, and currently serve on Caltrans' PEL Study Stakeholder Working Group, Environmental and Technical Working Group, and Design Working Group. Members are also engaged in the nascent and related North Bay Baylands Regional Conservation Investment Strategy. The Baylands

Group has provided feedback on DAA and PEL products and processes through meetings, comment letters, and “homework” assignments.

The SR 37 DAAs, PEL, and related multi-benefit planning and design efforts provide a solid foundation for a forward-thinking process that can build an equitable, resilient, biodiverse future for the North Bay. We look forward to collaborating further with the region’s leaders, Caltrans, MTC, and local transportation agencies to build this future together.

The following members of the Baylands Group and additional organizations support this position paper:

Citizens Committee to Complete the Refuge
Ducks Unlimited
Marin Audubon Society
Marin Conservation League
Natural Heritage Institute
Point Blue Conservation Science
San Francisco Baykeeper
San Francisco Bay Regional Water Quality Control Board
San Francisco Bay Joint Venture
Save the Bay
Sonoma Ecology Center
Sonoma Land Trust
State Coastal Conservancy