

ROAD REPAIR AND ACCOUNTABILITY ACT OF 2017  
PROJECT BASELINE AGREEMENT

Sonoma-Marín Area Rail Transit District (SMART) Healdsburg Extension Project

Resolution **SCCP-P-2526-02B; LPP-P-2526-07B**  
(to be completed by CTC)

1. FUNDING PROGRAM

- Active Transportation Program
- Local Partnership Program (Competitive)
- Solutions for Congested Corridors Program
- State Highway Operation and Protection Program
- Trade Corridor Enhancement Program

2. PARTIES AND DATE

2.1 This Project Baseline Agreement (Agreement) effective on **December 4, 2025** (will be completed by CTC), is made by and between the California Transportation Commission (Commission), the California Department of Transportation (Caltrans), the Project Applicant, **Caltrans/Metropolitan Transportation Commission (MTC)**, and the Implementing Agency, **Sonoma-Marín Area Rail Transit District (SMART)**, sometimes collectively referred to as the "Parties".

3. RECITAL

- 3.1 Whereas at its **6/27/2025** meeting the Commission approved the **Solutions for Congested Corridors Program** and included in this program of projects the **Sonoma-Marín Area Rail Transit District (SMART) Healdsburg**, the parties are entering into this Project Baseline Agreement to document the project cost, schedule, scope and benefits, as detailed on the Project Programming Request Form attached hereto as **Exhibit A**, the Project Report attached hereto as **Exhibit B**, the Performance Metrics Form, if applicable, attached hereto as **Exhibit C**, as the baseline for project monitoring by the Commission.
- 3.2 The undersigned Project Applicant certifies that the funding sources cited are committed and expected to be available; the estimated costs represent full project funding; and the scope and description of benefits is the best estimate possible.

4. GENERAL PROVISIONS

The Project Applicant, Implementing Agency, and Caltrans agree to abide by the following provisions:

- 4.1 To meet the requirements of the Road Repair and Accountability Act of 2017 (Senate Bill [SB] 1, Chapter 5, Statutes of 2017) which provides the first significant, stable, and on-going increase in state transportation funding in more than two decades.
- 4.2 To adhere, as applicable, to the provisions of the Commission:
- Resolution **[ ]**, "Adoption of Program of Projects for the Active Transportation Program", dated **[ ]**
  - Resolution **G25-43**, "Adoption of Program of Projects for the Local Partnership Program", dated **6/27/2025**
  - Resolution **G-25-41**, "Adoption of Program of Projects for the Solutions for Congested Corridors Program", dated **6/27/2025**
  - Resolution **[ ]**, "Adoption of Program of Projects for the State Highway Operation and Protection Program", dated **[ ]**
  - Resolution **[ ]**, "Adoption of Program of Projects for the Trade Corridor Enhancement Program", dated **[ ]**

- 4.3 All signatories agree to adhere to the Commission's Guidelines. Any conflict between the programs will be resolved at the discretion of the Commission.
- 4.4 All signatories agree to adhere to the Commission's SB 1 Accountability and Transparency Guidelines and policies, and program and project amendment processes.
- 4.5 Sonoma-Marín Area Rail Transit District (SMART) agrees to secure funds for any additional costs of the project.
- 4.6 Sonoma-Marín Area Rail Transit District (SMART) agrees to report to Caltrans on a quarterly basis; on the progress made toward the implementation of the project, including scope, cost, schedule, and anticipated benefits/performance metric outcomes.
- 4.7 Caltrans agrees to prepare program progress reports on a on a semi-annual basis and include information appropriate to assess the current state of the overall program and the current status of each project identified in the program report.
- 4.8 Sonoma-Marín Area Rail Transit District (SMART) agrees to submit a timely Completion Report and Final Delivery Report as specified in the Commission's SB 1 Accountability and Transparency Guidelines.
- 4.9 Sonoma-Marín Area Rail Transit District (SMART) agrees to submit a timely Project Performance Analysis as specified in the Commission's SB 1 Accountability and Transparency Guidelines.
- 4.10 All signatories agree to maintain and make available to the Commission and/or its designated representative, all work related documents, including without limitation engineering, financial and other data, and methodologies and assumptions used in the determination of project benefits and performance metric outcomes during the course of the project, and retain those records for six years from the date of the final closeout of the project. Financial records will be maintained in accordance with Generally Accepted Accounting Principles.
- 4.11 The Inspector General of the Independent Office of Audits and Investigations has the right to audit the project records, including technical and financial data, of the Department of Transportation, the Project Applicant, the Implementing Agency, and any consultant or sub-consultants at any time during the course of the project and for six years from the date of the final closeout of the project, therefore all project records shall be maintained and made available at the time of request. Audits will be conducted in accordance with Generally Accepted Government Auditing Standards.

## 5. SPECIFIC PROVISIONS AND CONDITIONS

- 5.1 Project Schedule and Cost  
See Project Programming Request Form, attached as Exhibit A.
- 5.2 Project Scope  
See Project Report or equivalent, attached as Exhibit B. At a minimum, the attachment shall include the cover page, evidence of approval, executive summary, and a link to or electronic copy of the full document.
- 5.3 Performance Metrics  
See Performance Metrics Form, if applicable, attached as Exhibit C.
- 5.4 Additional Provisions and Conditions *(Please attach an additional page if additional space is needed.)*

The State will not cover costs in the event of cost overruns.

In the event of cost overruns, SMART local sales tax or other non-State resources will be used to cover costs.

### Attachments:

- Exhibit A: Project Programming Request Form
- Exhibit B: Project Report
- Exhibit C: Performance Metrics Form *(if applicable)*

SIGNATURE PAGE  
TO  
PROJECT BASELINE AGREEMENT

Project Name Sonoma-Marin Area Rail Transit District (SMART) Healdsburg Extension Project

Resolution SCCP-P-2526-02B; LPP-P-2526-07B

*(to be completed by CTC)*



10/17/2025

Andrew Freimer

Date

Executive Director

Project Applicant



10/6/2025

Eddy Cumins

Date

General Manager, SMART

Implementing Agency



David Ambuehl (Oct 20, 2025 10:14:33 PDT)

10/20/2025

David Ambuehl

Date

District Director

California Department of Transportation



11/20/2025

Dina El-Tawansy

Date

Director

California Department of Transportation



02/11/2026

Tanisha Taylor

Date

Executive Director

California Transportation Commission

ADDITIONAL SIGNATURE PAGE

TO

PROJECT BASELINE AGREEMENT

Project Title: Sonoma-Marin Area Rail Transit District (SMART) Healdsburg Extension Project

Resolution: SCCP-P-2526-02B; LPP-P-2526-07B

*(to be completed by CTC)*

*David Ambuehl*  
David Ambuehl (Oct 20, 2025 10:14:33 PDT)

10/20/2025

David Ambuehl

Date

Acting District Director D4

Project Applicant

\_\_\_\_\_

Date

\_\_\_\_\_

\_\_\_\_\_

Project Applicant

\_\_\_\_\_

Date

\_\_\_\_\_

\_\_\_\_\_

Project Applicant

**FACTSHEET**



**SMART Healdsburg Extension**

**Nominating Agencies:** California Department of Transportation (Caltrans) and the Metropolitan Transportation Commission; Sonoma-Marin Area Rail Transit District (SMART) will be the implementing agency.

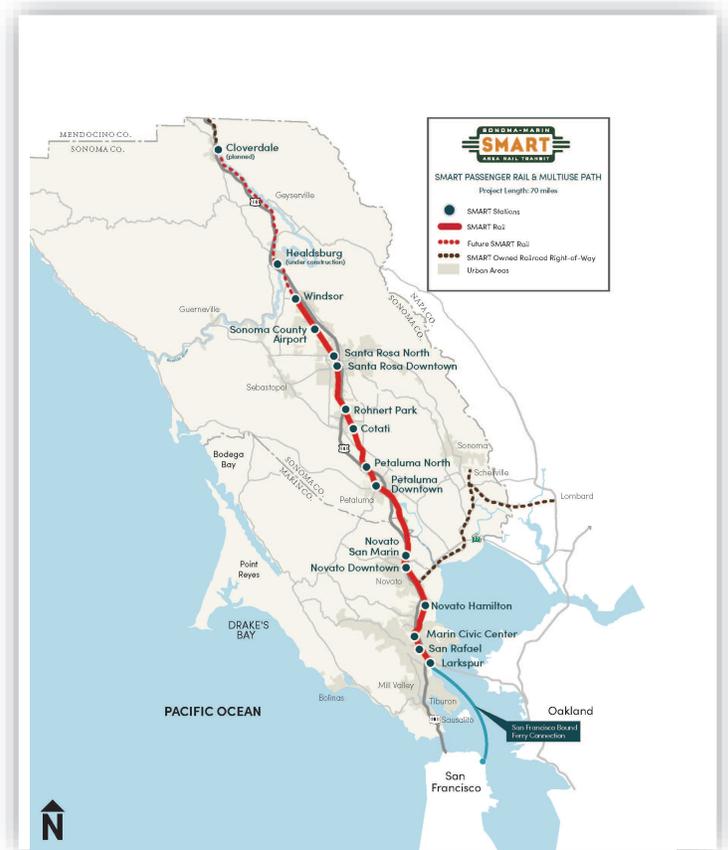
**Project Location:**

The SMART rail service is in Marin and Sonoma counties in the northwestern San Francisco Bay Area, parallel to US 101. In Sonoma County, the **SMART Healdsburg Extension Project** (Project) will extend rail and pathway to Healdsburg, a city and international tourist destination 15 miles north of Santa Rosa and 70 miles north of San Francisco.

**Project Scope:**

The Project will include approximately 9-miles of Class IV mainline track between Windsor and Healdsburg and 5.5-mile extension of the active transportation SMART Pathway (also known as Great Redwood Trail). The Project will also include a new station with amenities, six bridges, including the Russian River Rail Bridge, freight accommodating infrastructure such as spurs where justified and station gauntlet tracks, upgrades to SMART's dispatch system and rail operations center, and new broadband capacity. It will also include 21 at-grade crossings, federally mandated Positive Train Control rail safety systems and a zero-emission switcher locomotive.

**Project Cost:**



**Project Corridor Map. SMART Passenger Rail and Pathway in the northwestern San Francisco Bay Area**

Total Project Cost	Total SCCP + Total LPPC Funds
\$269m Healdsburg + \$6m ZEV Locomotive	\$56m + \$25m for Healdsburg; \$6m for ZEV Locomotive

**Project Schedule:**

Project Approval & Environmental Document	Ready to List (Contract Award)	Design within Progressive Design-Build *	Right-of-Way	Construction
July 2008	March 2026 (Phase 1 Sept. 2025)	Oct. 2025 - March 2026	March 2021	April 2026

\* Healdsburg project is using an innovative Progressive Design-Build process with Phase 1 Contract Award September 2025 and subsequent early works and Phase 2 contract amendments starting early 2026.

## Project Benefits:

SMART is one of the few transit agencies across the nation to see ridership not only return to pre-COVID-19 (Pandemic) levels, but surpass them. In Fiscal Year 2024-25, SMART carried 1.13 million passengers nearly 23.4 million miles. SMART's impressive ridership growth trend, shown in green at right, demonstrates the demand for high quality transit in the northern Bay Area. The Project will provide an extension of a high-quality transit option and improve multimodal connectivity and active transportation accessibility to **address extensive congestion on US 101**, reducing vehicle miles traveled

(VMT) and associated greenhouse gas (GHG) emissions. Additional benefits include the support of transit oriented and affordable housing developments, the extended tracks which allow for freight rail service which supports economic development, and increased transit options for the community and high number of tourists traveling to the region.

## Air Quality

The rail-only portion of the Project between Windsor and Healdsburg is conservatively\*\* estimated to see a **20-year total GHG reduction of 193,717 metric tons of Carbon Dioxide and 93,684 daily VMT.**

\*\*These benefits do not include the Zero Emission Switcher locomotive or active transportation SMART Pathway extension, both which will provide additional air quality improvements.

## Equity

The Project will facilitate access to healthcare by providing people with increased connections to basic care, general hospitals, and specialty care in more centralized locations like Santa Rosa. The provider for Covered California, California's subsidized health care insurance plan, is Kaiser Permanente in Santa Rosa. The Project will allow those in Healdsburg a car-free way to reach care. Tracts around Healdsburg are Disadvantaged in areas including Climate & Disaster Risk Burden, Environmental Burden, and Transportation Insecurity; this Project improves all areas.

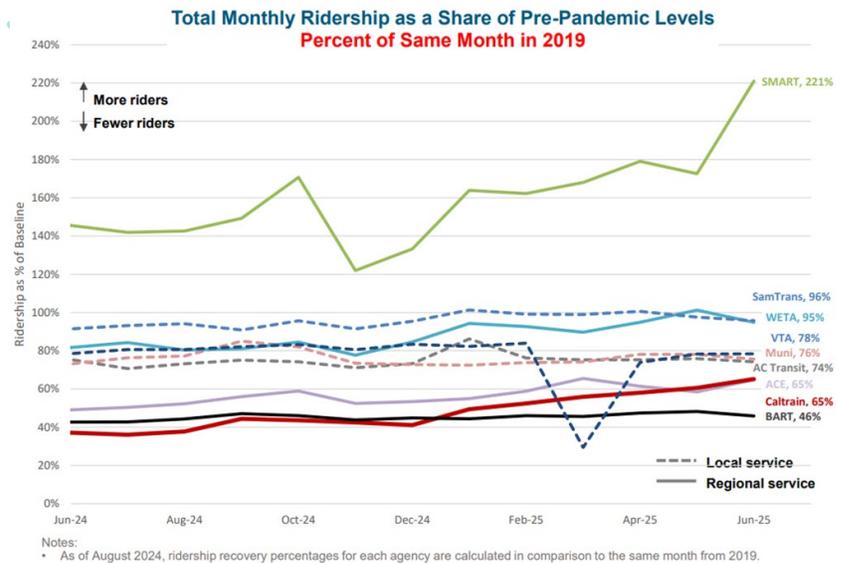
## Outcomes and Other Benefits

The Project provides the catalyst and cornerstone for Healdsburg to have a transit-oriented development (TOD) with high quality transit in the downtown district. A TOD can improve the quality of life for the community by creating a vibrant city center with more affordable housing, job opportunities, and health care access. Preserving the rural environment is a top priority for Marin and Sonoma County residents and SMART enables communities to focus housing development around transit nodes.

Sonoma County tourism annually generates \$2.3 billion in travel spending from 10.3 million visitors, 46% staying overnight. Despite having only 11,518 residents, Healdsburg has an outsized impact on the region, being one of the **top 10 trip generating areas** in Sonoma County. Extending SMART service to Healdsburg will support local and regional economic health, while minimizing transportation environmental impacts.

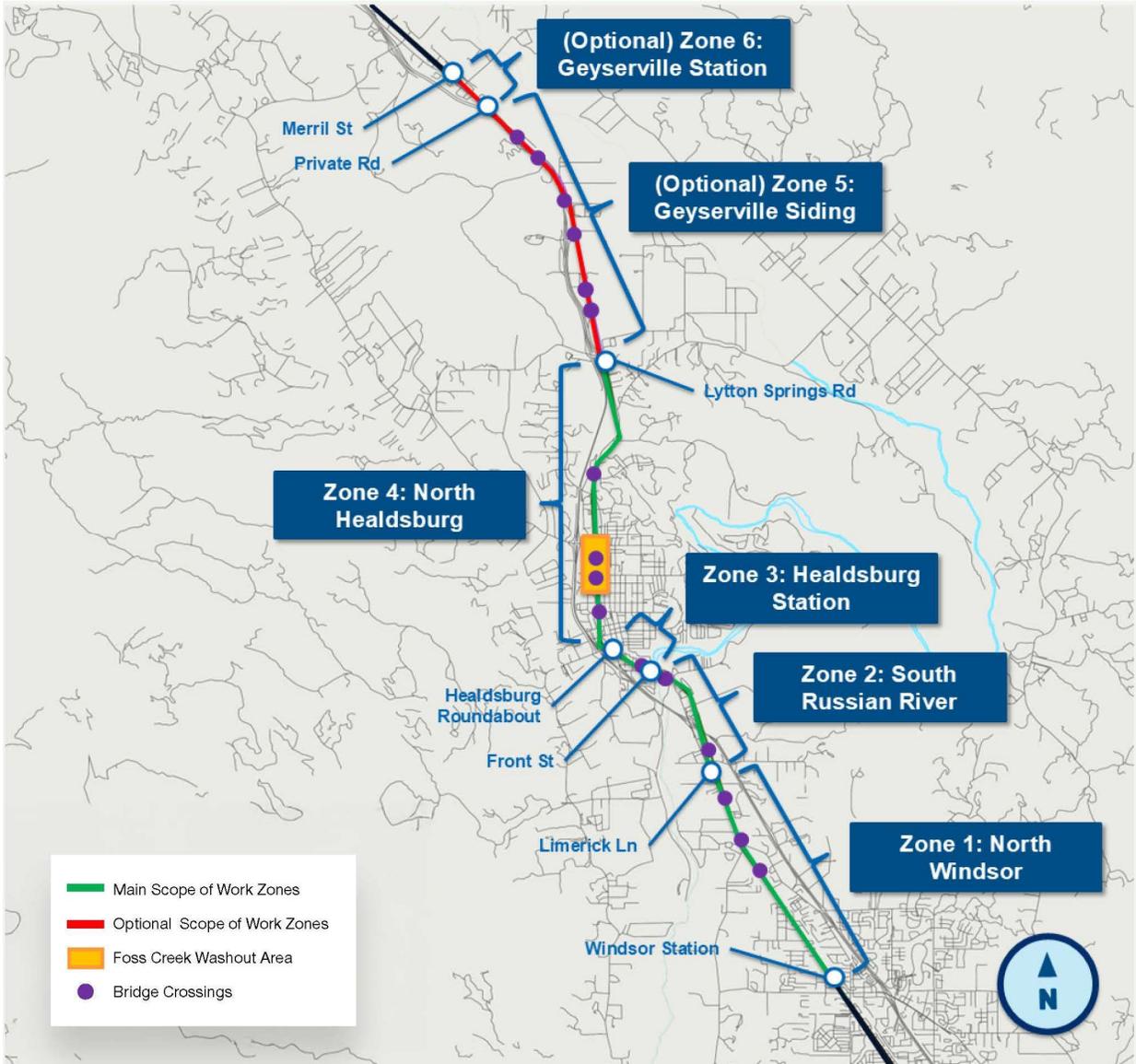
## Public Transit Ridership Recovery in the Bay Area

The below chart estimates pandemic ridership recovery by comparing each month's total ridership to that of the same pre-pandemic month in 2019.



### Project Vicinity Map

#### Project Limits: Windsor Station to Lytton Springs Road (Zone 1-4)



Amendment (Existing Project) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO						Date	10/21/2025 18:58:03
Programs	<input type="checkbox"/> LPP-C	<input type="checkbox"/> LPP-F	<input type="checkbox"/> SCCP	<input type="checkbox"/> TCEP	<input type="checkbox"/> STIP	<input type="checkbox"/> Other	
District	EA	Project ID	PPNO	Nominating Agency			
75			2364N	Caltrans HQ			
County	Route	PM Back	PM Ahead	Co-Nominating Agency			
Sonoma County				Metropolitan Transportation Commission			
				MPO	Element		
				MTC	Rail		
Project Manager/Contact			Phone	Email Address			
Joanne Parker			707-794-3062	jparker@sonomamarintrain.org			

**Project Title**

Sonoma-Marine Area Rail Transit District (SMART) Healdsburg Extension Project

**Location (Project Limits), Description (Scope of Work)**

In Sonoma County between Town of Windsor SMART Station (MP63) to the Healdsburg northern city limits at Lytton Road (MP72), including unincorporated Sonoma County.

The SMART Healdsburg Extension Project will complete construction of the civil and systems work for the rail and pathway project for approximately 9- miles of Class IV mainline track, six bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART's dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, twenty one at-grade crossings, a paved non-motorized bicycle/pedestrian facility, new broadband capacity for public agencies, federally mandated Positive Train Control (PTC).

Component	Implementing Agency
PA&ED	Sonoma Marin Area Rail Transit
PS&E	Sonoma Marin Area Rail Transit
Right of Way	Sonoma Marin Area Rail Transit
Construction	Sonoma Marin Area Rail Transit

**Legislative Districts**

Assembly:	2,4,12	Senate:	2,3	Congressional:	2,4
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Project Milestone	Existing	Proposed
Project Study Report Approved		
Begin Environmental (PA&ED) Phase	01/01/2000	01/01/2000
Circulate Draft Environmental Document <span style="float: right;">Document Type</span>		
Draft Project Report	11/21/2005	11/21/2005
End Environmental Phase (PA&ED Milestone)	07/21/2008	07/21/2008
Begin Design (PS&E) Phase	01/01/2025	01/01/2025
End Design Phase (Ready to List for Advertisement Milestone)	03/01/2026	03/01/2026
Begin Right of Way Phase	07/01/1990	07/01/1990
End Right of Way Phase (Right of Way Certification Milestone)	03/01/2021	03/01/2021
Begin Construction Phase (Contract Award Milestone)	04/01/2026	04/01/2026
End Construction Phase (Construction Contract Acceptance Milestone)	12/31/2028	12/31/2028
Begin Closeout Phase	05/01/2029	05/01/2029
End Closeout Phase (Closeout Report)	12/31/2029	12/31/2029

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**Purpose and Need**

This project will address many challenges in the northern San Francisco Bay Area, including providing high quality transit travel options, multimodal connectivity, rehabilitating existing underutilized, publicly owned transportation infrastructure, supporting transit oriented and affordable housing development, reducing vehicle miles traveled, supporting economic development through passenger and freight rail service and the Great Redwood Trail, workforce transport and bringing tourists to the region, each with lower greenhouse gas emissions impact than current infrastructure allows. SMART's average passenger trip length is 20-22 miles with significant percentages of riders accessing the system through bus, bicycle and walking for the first and last mile. The project also provides greater emergency resilience to enable delivery of supplies and personnel and evacuation of people, including rail vehicle acquisition. Finally, the project includes continuing successful public-private partnership between SMART and the internet service provider Sonic to bring high speed fiber optic, broadband internet services to communities along the SMART rail corridor and improve public access to telecommunications services throughout SMART's and Sonic's service areas.

NHS Improvements <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Roadway Class NA	Reversible Lane Analysis <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Inc. Sustainable Communities Strategy Goals <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Reduce Greenhouse Gas Emissions <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

Project Outputs			
Category	Outputs	Unit	Total
Rail/ Multi-Modal	Grade separations/ rail crossing improvemnets	EA	21
Rail/ Multi-Modal	New stations	EA	1
Rail/ Multi-Modal	Miles of rehabilitated track	Miles	9
Active Transportation	Pedestrian/Bicycle facilities miles constructed	Miles	5.5

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#### Additional Information

The project delivery method is Progressive Design Build (PDB). SMART is a transit district authorized to utilize this procurement methodology under SB 617. As a PDB project, the work will be undertaken in a phased approach.

Phase 0: Program supplement 04SMARTPS-07 (covering TIRCP Cycle 6 Augmentation funds for \$1.45m - 04 CP041A) provides for procurement support in development of an RFQ/RFP, PDB advisory services, project cost estimating, and environmental services. In September 2024, CoCo Consult was awarded a contract to provide procurement support, PDB advisory services, and cost estimating. In July 2025, WRA was awarded a contract for on-call environmental services. In April of 2025, SMART began the PDB procurement process for the Windsor to Healdsburg Extension Project, with proposals reviewed during summer 2025 and Phase 1 PDB contract award scheduled for September 2025. Services from these consultants will be ongoing throughout the life of the PDB project but will remain in this project scope. Additional Phase 0 staff and contract scope are funded through FTA and local sales tax.

Phase 1: This phase includes all design and engineering sufficient to establish a Guaranteed Maximum Price (GMP) for the project and support for the design and construction of civil, structures, systems, and architectural improvements for the project. This phase will also include environmental mitigation activities, and SMART staff costs including project management. Phase 1 is being funded with TIRCP Cycle 6 Augmentation funds allocated by CTC August 2025.

Phase 1A: Overlapping with a portion of Phase 1, this phase will consist of early work packages to include such things as site prep, utility relocation, and procurement of long lead items, though this is not an exhaustive list of potential early works packages. The PDB contractor will be identifying these early works packages and performing these services after open-book cost negotiations with SMART and the cost estimating consultant. In addition, we will be issuing a task order for construction management services on this project to one of our on-call construction management contractors. Phase 1A is planned to be funded with a combination of TIRCP Cycle 6 Augmentation and TIRCP Cycle 7 funds.

Phase 2: This phase covers the final design and construction for the Healdsburg extension, which will be initiated by the open-book negotiation of a GMP for the complete project, which may be executed in one or more construction packages with the PDDBE. The ultimate number of construction packages will depend on the contractor. In addition, SMART will be executing additional task orders for construction management and testing against on call contracts. Phase 1 work is planned to be funded with a combination of SCC, LPPC, TIRCP Cycle 7, FRA and Regional Bridge Tolls (RM3).

This project is located in a State-designated AB1550 Low Income community and there are six Federally recognized Tribal Nations located in Sonoma County, including the most recent land to be taken into trust near the future Windsor SMART Station. This project is included in State and Regional Plans, including the State Rail Plan and the Metropolitan Transportation Commission's Plan Bay Area 2050 (October 2024 amendment).

Performance Indicators and Measures						
Measure	Required For	Indicator/Measure	Unit	Build	Future No Build	Change
Congestion Reduction	LPPC, SCCP, LPPF	Change in Daily Vehicle Miles Travelled	Miles	3,996,000	4,089,684	-93,684
			VMT per Capita	0	0	0
	LPPC, SCCP, LPPF	Person Hours of Travel Time Saved (Only 'Change' required)	Person Hours	598,197.6	435,090	163,107.6
			Hours per Capita	0	0	0
System Reliability (Freight)	LPPC, SCCP, LPPF	Peak Period Travel Time Reliability Index (Only 'No Build' Required)	Index	0	0	0
	LPPC, SCCP, LPPF	Level of Transit Delay (if required)	% "On-time"	18.4	40.02	-21.62
Air Quality & GHG (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Particulate Matter	PM 2.5 Tons	0	4	-4
			PM 10 Tons	0	4	-4
	LPPC, SCCP, TCEP, LPPF	Carbon Dioxide (CO2)	Tons	0	193,717	-193,717
	LPPC, SCCP, TCEP, LPPF	Volatile Organic Compounds (VOC)	Tons	0	15	-15
	LPPC, SCCP, TCEP, LPPF	Sulphur Dioxides (SOx)	Tons	0	2	-2
	LPPC, SCCP, TCEP, LPPF	Carbon Monoxide (CO)	Tons	0	351	-351
	LPPC, SCCP, TCEP, LPPF	Nitrogen Oxides (NOx)	Tons	0	172	-172
Safety	LPPC, SCCP, TCEP, LPPF	Number of Fatalities	Number	7	8	-1
	LPPC, SCCP, TCEP, LPPF	Fatalities per 100 Million VMT	Number	0.15997	0.17885	-0.01888
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries	Number	72	74	-2
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries per 100 Million VMT	Number	1.64548	1.65244	-0.00696
Economic Development	LPPC, SCCP, TCEP, LPPF	Jobs Created (Only 'Build' Required)	Number	2,496	0	2,496
Cost Effectiveness (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Cost Benefit Ratio	Ratio	5.3	0	5.3
Vehicle Volume	LPPC, LPPF, SCCP	Existing Average Annual Vehicle Volume on Project Segment	Number	0	0	0
	LPPC, LPPF, SCCP	Estimated Year 20 Average Annual Vehicle Volume on Project Segment with Project	Number	0	0	0

District	County	Route	EA	Project ID	PPNO
75	Sonoma County				2364N

**Project Title**  
 Sonoma-Marin Area Rail Transit District (SMART) Healdsburg Extension Project

Existing Total Project Cost (\$1,000s)									Implementing Agency
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E		1,800	1,450					3,250	Sonoma Marin Area Rail Transit
R/W SUP (CT)									Sonoma Marin Area Rail Transit
CON SUP (CT)									Sonoma Marin Area Rail Transit
R/W									Sonoma Marin Area Rail Transit
CON				265,500				265,500	Sonoma Marin Area Rail Transit
<b>TOTAL</b>		1,800	1,450	265,500				268,750	

Proposed Total Project Cost (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E		1,800	1,450					3,250	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				265,500				265,500	
<b>TOTAL</b>		1,800	1,450	265,500				268,750	

<b>Fund #1:</b>	Local Funds - Bridge Tolls - Regional Measure 3 (Committed)								Program Code
	Existing Funding (\$1,000s)								20.10.400.100
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Metropolitan Transportation Commiss Voter approved measure project.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				40,000				40,000	
<b>TOTAL</b>				40,000				40,000	

Proposed Funding (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				40,000				40,000	
<b>TOTAL</b>				40,000				40,000	

Fund #2:	FTA Funds - Community Project Funding (Committed)								Program Code
Existing Funding (\$1,000s)									FTA-TRANSIT
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Congressionally directed community project awarded 2023 appropriations.
PS&E		1,800						1,800	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON									
TOTAL		1,800						1,800	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E		1,800						1,800	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON									
TOTAL		1,800						1,800	

Fund #3:	Federal Disc. - Consolidated Rail Infrastructure Safety Improvement (Committed)								Program Code
Existing Funding (\$1,000s)									20.XX.400.300
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Federal Railroad Administration - Awarded 9/2023
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				28,140				28,140	
TOTAL				28,140				28,140	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				28,140				28,140	
TOTAL				28,140				28,140	

Fund #4:	State SB1 SCCP - Solution for Congested Corridors Program (Committed)								Program Code
Existing Funding (\$1,000s)									30.20.110.000
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E									Program Code 30.20.110.000
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				56,000				56,000	
TOTAL				56,000				56,000	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				56,000				56,000	
TOTAL				56,000				56,000	

Fund #5:	Other State - Transit and Intercity Rail Capital Program (TIRCP) (Committed)								Program Code
Existing Funding (\$1,000s)									20.30.207.811
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									California Transportation Commissio
PS&E			1,450					1,450	Cycle 6 Augmentation. Allocated June 2024 for Phase 0 work and August 2025 for Phase 1 work.
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				33,360				33,360	
TOTAL			1,450	33,360				34,810	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E			1,450					1,450	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				33,360				33,360	
TOTAL			1,450	33,360				34,810	

Fund #6:	Other State - Transit and Intercity Rail Capital Program (TIRCP) (Committed)								Program Code
Existing Funding (\$1,000s)									20.30.207.811
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									California Transportation Commissio Cycle 7, to be used for Phase 1A and Phase 2 work.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				81,000				81,000	
TOTAL				81,000				81,000	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				81,000				81,000	
TOTAL				81,000				81,000	

Fund #7:	Local Funds - SON Co Sales Tax (Committed)								Program Code
Existing Funding (\$1,000s)									20.10.400.100
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma County Transportation Auth Measure M Rail to be used for Phase 0, Phase 1, Phase 1A and Phase 2 work, as needed.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				2,000				2,000	
TOTAL				2,000				2,000	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				2,000				2,000	
TOTAL				2,000				2,000	

Fund #8:	State SB1 LPP - Local Partnership Program - Competitive program (Committed)								Program Code
Existing Funding (\$1,000s)									30.20.724.200
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma Marin Area Rail Transit Programmed June 2025. Planned to fund Phase 2 work.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				25,000				25,000	
TOTAL				25,000				25,000	
Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				25,000				25,000	
TOTAL				25,000				25,000	

**Complete this page for amendments only**

Date 10/21/2025 18:58:03

District	County	Route	EA	Project ID	PPNO
75	Sonoma County				2364N

**SECTION 1 - All Projects**

**Project Background**

In Sonoma County between Town of Windsor SMART Station (MP63) to the Healdsburg northern city limits at Lytton Road (MP72), including unincorporated Sonoma County.

The SMART Healdsburg Extension Project will complete construction of the civil and systems work for the rail and pathway project for approximately 9- miles of Class IV mainline track, six bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART’s dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, twenty one at-grade crossings, a paved non-motorized bicycle/ pedestrian facility, new broadband capacity for public agencies, federally mandated Positive Train Control (PTC).

**Programming Change Requested**

**Reason for Proposed Change**

ePPR corrected to show committed funds for Baseline Agreement.

If proposed change will delay one or more components, clearly explain 1) reason for the delay, 2) cost increase related to the delay, and 3) how cost increase will be funded

**Other Significant Information**

**SECTION 2 - For SB1 Project Only**

Project Amendment Request (Please follow the individual SB1 program guidelines for specific criteria)

ePPR correction to show committed funds for Baseline Agreement.

**Approvals**

I hereby certify that the above information is complete and accurate and all approvals have been obtained for the processing of this amendment request.

Name (Print or Type)	Signature	Title	Date

**SECTION 3 - All Projects**

**Attachments**

- 
- 1) Concurrence from Implementing Agency and/or Regional Transportation Planning Agency
  - 2) Project Location Map

Amendment (Existing Project) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO						Date	10/21/2025 18:56:19
Programs <input type="checkbox"/> LPP-C <input type="checkbox"/> LPP-F <input type="checkbox"/> SCCP <input type="checkbox"/> TCEP <input type="checkbox"/> STIP <input type="checkbox"/> Other							
District	EA	Project ID	PPNO	Nominating Agency			
75			2364P	Caltrans HQ			
County	Route	PM Back	PM Ahead	Co-Nominating Agency			
Sonoma County				Metropolitan Transportation Commission			
				MPO	Element		
				MTC	Rail		
Project Manager/Contact			Phone	Email Address			
Joanne Parker			707-794-3062	jparker@sonomamarintrain.org			

**Project Title**

Sonoma-Marine Area Rail Transit District (SMART) Healdsburg Extension Project (Zero Emission Switcher Locomotive - ZEV)

**Location (Project Limits), Description (Scope of Work)**

In Sonoma County between Town of Windsor SMART Station to the City of Healdsburg. The ZEV will be used throughout the SMART System.

The SMART Healdsburg Extension Project will complete construction of the civil and systems work for the rail and pathway project for just over 5.5 miles of Class IV mainline track, six bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART's dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, fourteen at-grade crossings, a paved non-motorized bicycle/pedestrian facility, new broadband capacity for public agencies, federally mandated Positive Train Control (PTC), capacity increasing rail vehicles including through acquisition of a Zero Emission Switcher Locomotive for freight or excursion services.

This PPR covers only the Zero Emission Switcher.

Component	Implementing Agency
PA&ED	Sonoma Marin Area Rail Transit
PS&E	Sonoma Marin Area Rail Transit
Right of Way	Sonoma Marin Area Rail Transit
Construction	Sonoma Marin Area Rail Transit

**Legislative Districts**

Assembly:	2,4,12	Senate:	2,3	Congressional:	2,4
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Project Milestone	Existing	Proposed
Project Study Report Approved		
Begin Environmental (PA&ED) Phase	01/01/2000	01/01/2000
Circulate Draft Environmental Document <span style="float: right;">Document Type</span>		
Draft Project Report	11/21/2005	11/21/2005
End Environmental Phase (PA&ED Milestone)	07/21/2008	07/21/2008
Begin Design (PS&E) Phase	01/01/2025	01/01/2025
End Design Phase (Ready to List for Advertisement Milestone)	03/01/2026	03/01/2026
Begin Right of Way Phase	07/01/1990	07/01/1990
End Right of Way Phase (Right of Way Certification Milestone)	03/01/2021	03/01/2021
Begin Construction Phase (Contract Award Milestone)	04/01/2026	04/01/2026
End Construction Phase (Construction Contract Acceptance Milestone)	07/31/2028	07/31/2028
Begin Closeout Phase	10/31/2028	10/31/2028
End Closeout Phase (Closeout Report)	01/26/2029	01/26/2029

Date 10/21/2025 18:56:19

**Purpose and Need**

This project will address many challenges in the northern San Francisco Bay Area, including providing high quality transit travel options, multimodal connectivity, rehabilitating existing underutilized, publicly owned transportation infrastructure, supporting transit oriented and affordable housing development, reducing vehicle miles traveled, supporting economic development through passenger and freight rail service and the Great Redwood Trail, workforce transport and bringing tourists to the region, each with lower greenhouse gas emissions impact than current infrastructure allows. SMART's average passenger trip length is 22-25 miles with significant percentages of riders accessing the system through bus, bicycle and walking for the first and last mile. The project also provides greater emergency resilience to enable delivery of supplies and personnel and evacuation of people, including rail vehicle acquisition. Finally, the project includes continuing successful public-private partnership between SMART and the internet service provider Sonic to bring high speed fiber optic, broadband internet services to communities along the SMART rail corridor and improve public access to telecommunications services throughout SMART's and Sonic's service areas.

The Zero Emission Switcher Locomotive will provide additional freight rail capacity for the entire system. SMART will have three locomotives total with this acquisition and will be able to position one at the freight rail yard in Schellville, one midpoint in the system in Petaluma and one in the far north in Cloverdale once built out. This positioning will allow efficient freight transport within SMART's single track passenger and freight rail system. In addition, this switcher locomotive will allow SMART staff to begin to experience zero emission locomotive technology capabilities. This initial zero emission effort will aide SMART in preparation for technology changes on the passenger side of the rail service.

NHS Improvements <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Roadway Class NA	Reversible Lane Analysis <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Inc. Sustainable Communities Strategy Goals <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Reduce Greenhouse Gas Emissions <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

Project Outputs			
Category	Outputs	Unit	Total
Rail/ Multi-Modal	Rail/Transit Equipment	EA	1

Date 10/21/2025 18:56:19

**Additional Information**

This Zero Emission Switcher Locomotive component of the SMART Healdsburg Extension Project has performance indicators and measures co-mingled within the Healdsburg Extension Project performance indicators and are not shown separately in this ePPR. The milestones of this Zero Emission Switcher Locomotive component are shown as the milestones of the Healdsburg Extension Project.

This project is located in a State-designated AB1550 Low Income community and there are six Federally recognized Tribal Nations located in Sonoma County, including the most recent land to be taken into trust near the future Windsor SMART Station. This project is included in State and Regional Plans, including the State Rail Plan and the Metropolitan Transportation Commission's Plan Bay Area 2050 (October 2024 amendment). SMART's expansion northward has been endorsed through Plan Bay Area Tribal consultation process.

A Benefit-Cost Analysis was not completed for this component so therefore there are no Performance Measures to fill out and that section is left blank here.

Performance Indicators and Measures						
Measure	Required For	Indicator/Measure	Unit	Build	Future No Build	Change
Congestion Reduction	LPPC, SCCP, LPPF	Change in Daily Vehicle Miles Travelled	Miles	0	0	0
			VMT per Capita	0	0	0
	LPPC, SCCP, LPPF	Person Hours of Travel Time Saved (Only 'Change' required)	Person Hours	0	0	0
			Hours per Capita	0	0	0
System Reliability (Freight)	LPPC, SCCP, LPPF	Peak Period Travel Time Reliability Index (Only 'No Build' Required)	Index	0	0	0
	LPPC, SCCP, LPPF	Level of Transit Delay (if required)	% "On-time"	0	0	0
Air Quality & GHG (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Particulate Matter	PM 2.5 Tons	0	0	0
			PM 10 Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Carbon Dioxide (CO2)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Volatile Organic Compounds (VOC)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Sulphur Dioxides (SOx)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Carbon Monoxide (CO)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Nitrogen Oxides (NOx)	Tons	0	0	0
Safety	LPPC, SCCP, TCEP, LPPF	Number of Fatalities	Number	0	0	0
	LPPC, SCCP, TCEP, LPPF	Fatalities per 100 Million VMT	Number	0	0	0
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries	Number	0	0	0
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries per 100 Million VMT	Number	0	0	0
Economic Development	LPPC, SCCP, TCEP, LPPF	Jobs Created (Only 'Build' Required)	Number	0	0	0
Cost Effectiveness (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Cost Benefit Ratio	Ratio	0	0	0
Vehicle Volume	LPPC, LPPF, SCCP	Existing Average Annual Vehicle Volume on Project Segment	Number	0	0	0
	LPPC, LPPF, SCCP	Estimated Year 20 Average Annual Vehicle Volume on Project Segment with Project	Number	0	0	0

District	County	Route	EA	Project ID	PPNO
75	Sonoma County				2364P

**Project Title**  
 Sonoma-Marin Area Rail Transit District (SMART) Healdsburg Extension Project (Zero Emission Switcher Locomotive - ZEV)

Existing Total Project Cost (\$1,000s)									Implementing Agency
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E									Sonoma Marin Area Rail Transit
R/W SUP (CT)									Sonoma Marin Area Rail Transit
CON SUP (CT)									Sonoma Marin Area Rail Transit
R/W									Sonoma Marin Area Rail Transit
CON				6,000				6,000	Sonoma Marin Area Rail Transit
<b>TOTAL</b>				<b>6,000</b>				<b>6,000</b>	

Proposed Total Project Cost (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				6,000				6,000	
<b>TOTAL</b>				<b>6,000</b>				<b>6,000</b>	

<b>Fund #1:</b>	State SB1 SCCP - Solution for Congested Corridors Program (Committed)								Program Code
	Existing Funding (\$1,000s)								30.20.110.000
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E									Project number 30.20.110.000
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				6,000				6,000	
<b>TOTAL</b>				<b>6,000</b>				<b>6,000</b>	

Proposed Funding (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				6,000				6,000	
<b>TOTAL</b>				<b>6,000</b>				<b>6,000</b>	

**Complete this page for amendments only**

Date 10/21/2025 18:56:19

District	County	Route	EA	Project ID	PPNO
75	Sonoma County				2364P

SECTION 1 - All Projects

**Project Background**

In Sonoma County between Town of Windsor SMART Station to the City of Healdsburg. The ZEV will be used throughout the SMART System. The SMART Healdsburg Extension Project will complete construction of the civil and systems work for the rail and pathway project for just over 5.5 miles of Class IV mainline track, six bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART's dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, fourteen at-grade crossings, a paved non-motorized bicycle/pedestrian facility, new broadband capacity for public agencies, federally mandated Positive Train Control (PTC), capacity increasing rail vehicles including through acquisition of a Zero Emission Switcher Locomotive for freight or excursion services. This PPR covers only the Zero Emission Switcher.

**Programming Change Requested**

**Reason for Proposed Change**

ePPR corrections to show committed funds for the Baseline Agreement.

If proposed change will delay one or more components, clearly explain 1) reason for the delay, 2) cost increase related to the delay, and 3) how cost increase will be funded

**Other Significant Information**

SECTION 2 - For SB1 Project Only

Project Amendment Request (Please follow the individual SB1 program guidelines for specific criteria)

ePPR corrections to show committed funds for the Baseline Agreement.

**Approvals**

I hereby certify that the above information is complete and accurate and all approvals have been obtained for the processing of this amendment request.

Name (Print or Type)	Signature	Title	Date

SECTION 3 - All Projects

**Attachments**

- 
- 1) Concurrence from Implementing Agency and/or Regional Transportation Planning Agency
  - 2) Project Location Map



## HEALDSBURG EXTENSION PROJECT

**PROJECT LOCATION:** SMART Railroad (Mile Posts 63 – 72), located in the Town of Windsor, City of Healdsburg, and Unincorporated Sonoma County, California

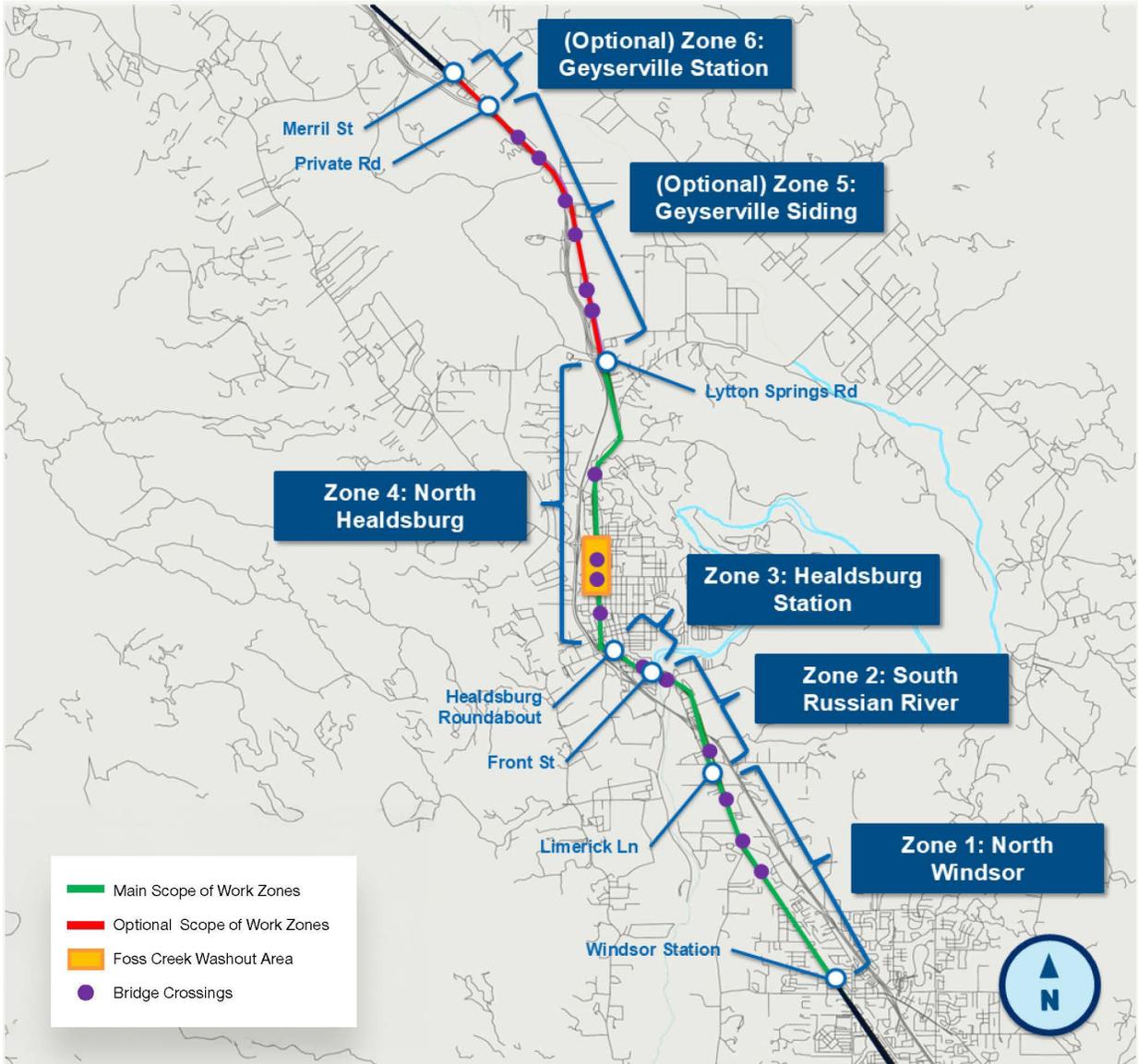
## PROJECT REPORT EQUIVALENT DOCUMENT



**OCTOBER 2025**

# Project Vicinity Map

## Project Limits: Windsor Station to Lytton Springs Road (Zone 1-4)





**Agency Certification:**

I, Joanne Parker, Grants Manager, have been given full authority by Sonoma-Marin Area Rail Transit District to prepare this report. I certify that the information and data contained in this report are true to the best of my knowledge and belief.

10/14/2025

**Signature**

**Date**

Grants and Legislative Affairs Manager

**Title**

Sonoma-Marin Area Rail Transit District

**Agency**

I have reviewed the information contained in this report and find the data and information to be complete, current, and accurate.

10/14/2025

**Signature**

**Date**

Project Manager

**Title**

Sonoma-Marin Area Rail Transit District

**Agency**



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## I. INTRODUCTION

### Project Description/Scope

SMART Healdsburg Rail System Extension Project will deliver nearly 9-miles of reconstructed publicly owned railroad, including civil and systems work, from the Town of Windsor (Milepost 63) north through unincorporated Sonoma County and the City of Healdsburg (Milepost 72), all located within Sonoma County. The project delivery method will be Progressive Design Build (PDB), as allowed to Transit Agencies in State law (SB617, effective January 1, 2024). The Phase 1 PDB contract was awarded at the SMART Board on September 17, 2025. The project cost estimate is \$269 million.

### Outputs

Included in this rail and pathway project is the construction of nearly 9-miles of Class IV mainline track, nine bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART's dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, twenty one at-grade crossings, a paved non-motorized bicycle/pedestrian facility, new broadband capacity for public agencies, and federally mandated Positive Train Control (PTC) railroad safety systems. The project includes a new passenger rail station at the City of Healdsburg, which will be the fifteenth station in the SMART system. Earlier phases of the project are complete. SMART is a publicly owned railroad system, that includes passenger commuter rail, short line freight rail, broadband access for public agencies and paved bicycle/pedestrian pathway facilities.

The Outputs of the Project are as follows:

Project Outputs			
Category	Outputs	Unit	Total
Rail/ Multi-Modal	Miles of rehabilitated track	Miles	9
Rail/ Multi-Modal	New stations	EA	1
Active Transportation	Pedestrian/Bicycle facilities miles constructed	Miles	5.5
Rail/ Multi-Modal	Grade separations/ rail crossing improvements	EA	21

### Benefits/Outcomes

This project will address many challenges in the northern San Francisco Bay Area, including providing high quality transit travel options, multimodal connectivity, rehabilitating existing underutilized public transportation infrastructure, supporting transit oriented and affordable housing development, reducing vehicle miles traveled, supporting economic development through freight rail service, workforce transport and bringing tourists to the region, each with

lower greenhouse gas emissions impact than current infrastructure allows. SMART's average passenger trip length is 21-22 miles with significant percentages of riders accessing the system through bus, bicycle and walking for the first and last mile. A regional transit rider passenger survey of 2023-24 found 32% of SMART passengers do not have access to a private vehicle and 52% of passengers earn less than \$100,000. The project also provides greater emergency resilience with an alternative to US Highway 101 for supply and personnel delivery and community evacuation. Finally, the project includes continuing successful public-private partnership between SMART and the internet service provider Sonic to bring high speed fiber optic, broadband internet services to communities along the SMART rail corridor and improve public access to telecommunications services throughout SMART's and Sonic's service areas.

The Outcomes of the Project are included as Appendix E. The Outcomes are performance metrics developed by Caltrans for the passenger rail portion of the project only and as shown in the application.

#### [Environmental Determination](#)

The project received environmental clearance through a Supplemental Environmental Impact Report in July 2008 (SCH#2002112033), received a California Transportation Commission acceptance in 2009 (Resolution E-09-56). Each are attached. The rail systems work for the project received a Federal Railroad Administration Categorical Exclusion determination in August 2024.

## II. BACKGROUND AND PROJECT HISTORY

SMART was created as a special district by State legislation (AB 2224) in 2002 to provide passenger rail service in Marin and Sonoma Counties. In 2008, the voters of the two counties approved a quarter cent sales tax which provided funding to begin rehabilitating the historic Northwestern Pacific Railroad. The railroad was constructed in the late 1800s and served as a transportation link to San Francisco, moving goods such as timber, produce, and materials as well as passengers. Activity gradually slowed on the line as the highway system was constructed and expanded. In the 1980s Marin and Sonoma purchased portions of the railroad from the Southern Pacific Railroad as they exited railroad service in the two counties. The intent was to preserve the right-of-way for public transportation.

SMART began construction of the passenger rail system in 2012 with the design and acquisition of a new passenger rail fleet, replacement of track, installation of a fiber communications system, replacement and /or rehabilitation of over forty timber trestle bridges, construction of ten passenger stations, five park and ride parking lots, the installation of a moveable bridge, construction of a train storage yard and dispatch center, and the installation of a Positive Train Control System. The initial operating system was 43 miles from downtown San Rafael to North Santa Rosa at the Airport Station. This first phase opened on August 25, 2017.

A two-mile extension was constructed from downtown San Rafael to Larkspur in 2018-2019 that added one station at the planned southern terminus in Larkspur. The extension opened on December 13, 2019. A simultaneously constructed infill station at Downtown Novato opened December 14, 2019.

SMART embarked upon a 3-mile northern extension from the Airport Station to the Town of Windsor in 2018 – the Windsor Extension Project. The extension constructs a new passenger station in Windsor, a double-track section for passing, a new track egress to the Rail Operations Center, pedestrian improvements on adjacent county-owned arterials, 3-miles of paved non-motorized pathway, a grade separated pedestrian path, and a other system elements. The project was paused due to external agency funding being frozen during the pandemic and restarted with State funding support in late 2023, with revenue service started May 2025.

While working on the delivery of the Windsor Extension, SMART simultaneously delivered several additional state grant-funded projects in the form of 5-miles of non-motorized pathway connecting communities along the corridor and an infill station at North Petaluma, which opened for revenue service January 2025.

Through the passage of Senate Bill (SB) 69 in 2021, the SMART Pathway officially became designated as the southern portion of the Great Redwood Trail. SMART's passenger ridership is growing rapidly, with FY 2024-25 ridership 56% higher than the previous annual record and FY25-26 monthly ridership to date up another 40% over FY24-25.

### III. PURPOSE AND NEED

#### **Purpose:**

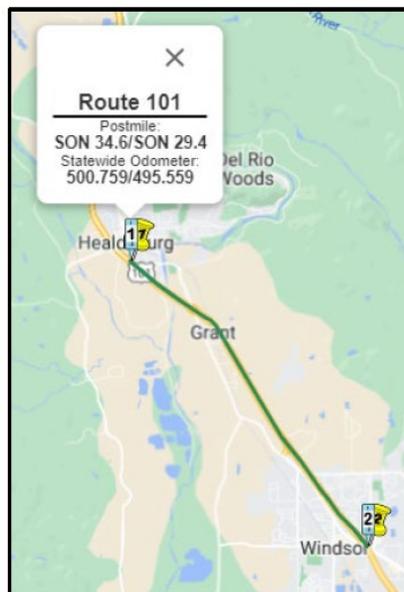
The **SMART Healdsburg Extension Project** will continue the completion of the voter approved SMART regional rail network further north to the City of Healdsburg. The purpose of the project is to fulfill many of the CMCP goals and reduction of vehicle miles traveled. Further, the purpose of the project is to fulfill the 2008 voter approved goal to reconstruct the railroad and offer modern passenger services between Healdsburg and points south.

#### **Need:**

The City of Healdsburg's downtown is one of the top-ten trip generation zones within Sonoma County, according to Sonoma County Transportation and Climate Authority (SCTCA) analysis. In 2024, 85% of Healdsburg's workforce of 5,500 commutes from outside Healdsburg, many from communities south of Healdsburg. The project is needed to provide a safe and effective alternative to private vehicles travel on US Highway 101, where traffic accidents, injuries and fatalities are an unfortunately regular occurrence pre- and post-pandemic (see table and figure from SCCP application), as well as greater safety for bicyclists using the pathway.

**Table D.2.1: Traffic Fatalities and Serious Injuries along US 101**

Years of Data	Total Months Data Collected	Postmile Location (US 101)	Fatalities	Serious Injuries	Total Crashes
2015 – 2019	60 months	SON 33.3	5.6	38.4	247
Jan. 2021 – Dec. 2023	36 months	SON 29.4 - 34.6 See Figure 4	6	32	86



**Figure 4: Postmiles along US 101**

The City of Healdsburg, the Town of Windsor, and Sonoma County are each designated Pro-Housing jurisdictions by the State of California and this project will provide transportation services to support transit-oriented housing development along the rail corridor in the North Bay. Without this project, the “high quality” transit services needed to support local jurisdiction applications for outside grants and financing to support the development of housing will not exist. The Cities of Santa Rosa, Rohnert Park and Petaluma are also state-designated Pro-Housing jurisdictions.

The project is ready to deliver via a progressive design build delivery method. This method is allowed by a new state law, effective January 2024, and includes a competitive procurement prior to award of a Phase 1 contract. Within that Phase 1 contract is design from 10% to 65% and any necessary Early Works Packages for long lead items or other activities to advance the completion of the overall project. Once 65% design is completed, Phase 2 package(s) would be awarded to the same contractor via a negotiated Guaranteed Maximum Price process, complete with independent cost estimation every step of the way. SMART conducted a

competitive progressive design build procurement through 2024-2025, with a Phase 1 contract award on September 17, 2025.

Early works packages are anticipated starting in January 2026, with construction beginning summer of 2026 and project completion/revenue rail service estimated in late 2028.

This project contains State-designated AB1550 Low Income communities and six Federally recognized Tribal Nations are located in Sonoma County, including the most recent land to be taken into trust near the Windsor SMART Station at the southern end of this project. This project is included in State and Regional plans, including State Rail Plan and the Metropolitan Transportation Commission's Plan Bay Area 2050. SMART's expansion northward has been endorsed through the Plan Bay Area 2040 Tribal consultation process and from Tribal Nations through the Plan Bay Area 2050 process.

#### IV. ENVIRONMENTAL DETERMINATION

The SMART Healdsburg Extension Project was environmentally evaluated through the analysis prepared for the 70-mile corridor project, resulting in the adoption of a Supplemental Environmental Impact Report in July 2008 (SCH#2002112033), received a California Transportation Commission acceptance in July 2009 (Resolution E-09-56). Each are attached. A new state law governing SMART's environmental clearance requirements will cover any future project modifications. Senate Bill 71 (Weiner) was signed into law October 13, 2025, in effect January 1, 2026.

SMART received Federal Railroad Administration Categorical Exclusion determination for the Healdsburg extension systems work on August 16, 2024.

#### VI. CONSIDERATIONS FOR DISCUSSION

The SMART Healdsburg Extension Project applicable considerations are listed below, with the others Not Applicable.

##### Right of Way

The right of way to be used for this SMART Healdsburg Extension Project is within the railroad right of way. SMART will work closely with adjacent property owners, public and private, during implementation of this project, including City of Healdsburg, Sonoma County and Town of Windsor. SMART will use the railroad right of way for railroad and street safety purposes, for first and last mile access to SMART's regional rail system and for access to local destinations. No further right of way acquisition is necessary to complete the project.

## Permitting/Environmental Compliance

As part of preparing preliminary engineering documents for the Project, SMART plans to secure the following environmental construction permits, with the full construction permits targeting a May 2027 approval date:

- CA Department of Fish and Wildlife Streambed Alteration Agreement
- CA North Coast Regional Water Quality Control Board Water Quality Certification
- U.S. Army Corps of Engineers Section 404 Permit

## Air Quality Conformity

The SMART Healdsburg project scope received Air Quality conformity in December 2012 through the Metropolitan Transportation Commission Air Quality Conformity Task Force. From the minutes: *“Final Determination: FHWA, Caltrans, EPA, FTA and MTC concurred that the project is exempt from PM2.5 project level analysis.”*

## Title VI Considerations

SMART has been found compliant with Federal Transit Administration Title VI requirements. SMART has a board-adopted Public Participation Program, part of an overall Title VI program required by the FTA. The current Title VI program document can be found here, with the Public Participation Plan beginning on Page 33:

[https://www.sonomarintrain.org/sites/default/files/Documents/SMART Title VI Program Sep2021 Final%209.15.21.pdf](https://www.sonomarintrain.org/sites/default/files/Documents/SMART_Title_VI_Program_Sep2021_Final%209.15.21.pdf)

## VI. FUNDING PLAN, PROGRAMMING AND HIGH-LEVEL ESTIMATE

This project is fully funded with remaining allocation actions anticipated at CTC meetings in early 2026 for programmed SCCP, LPPC and TIRCP funds.

The project scope of work is funded as described below:

### Fund Plan

Healdsburg Extension Funding			
Funding Source	Amount	Status	Scope
TIRCP Cycle 3+6	\$ 34,809,000	\$1,450,000 allocated June 2024; \$33,359,000 allocated August 2025	Cost estimating, program manger services and SMART project management (04SMARTPS-07); Phase 1 design/early works packages (ePPR-6411-2023-0004)
TIRCP Cycle 7	\$ 81,000,000	Award announcement October 2024	Design and construction
SCCP	\$ 56,000,000	Programmed June 2025	Final design and construction (ePPR-6411-2024-0002)
LPPC	\$ 25,000,000	Programmed June 2025	Final design and construction (ePPR-6411-2024-0002)
MTC RM3	\$ 40,000,000	Voter approved June 2018	Rail and pathway to Healdsburg, all phases
SCTCA Measure M	\$ 2,000,000	Appropriated October 6, 2025	Engineering, crossing and station construction - eligible expenses
FTA Community Project Funding	\$ 1,800,000	Executed August 2025	Preliminary design (CA-2025-110)
FRA CRISI	\$ 28,140,000	Award announcement September 2023	Design and construction of Positive Train Control system
<b>HEALDSBURG TOTAL</b>	<b>\$ 268,749,000</b>		

### Summary Budget Estimate for Progressive Design Build

Healdsburg Extension Budget - Estimate	
Civil Track, Crossings, Bridges and Culverts	\$ 102,609,819
Station and Non Motorized Pathway	\$ 37,204,117
Rail Systems	\$ 39,907,964
Project and Construction Management, Inspection, Permitting and Mitigation, Contingency	\$ 53,082,719
Survey and Design	\$ 35,944,380
<b>Project Estimate</b>	<b>\$ 268,749,000</b>

Healdsburg Extension Funding by PDB Phase				
Funding Source	PDB Phase 0	PDB Phase 1 and Phase 1A Early Works Design	PDB Phase 1A Early Works Construction and Phase 2	Totals
TIRCP Cycle 6	\$ 1,450,000			\$ 1,450,000
FTA Community Project Funding	\$ 1,800,000			\$ 1,800,000
TIRCP Cycle 6		\$ 33,359,000		\$ 33,359,000
SCTCA Measure M		\$ 2,000,000		\$ 2,000,000
TIRCP Cycle 7			\$ 81,000,000	\$ 81,000,000
SCCP			\$ 56,000,000	\$ 56,000,000
LPPC			\$ 25,000,000	\$ 25,000,000
MTC RM3			\$ 40,000,000	\$ 40,000,000
FRA CRISI			\$ 28,140,000	\$ 28,140,000
<b>HEALDSBURG TOTAL</b>	<b>\$ 3,250,000</b>	<b>\$ 35,359,000</b>	<b>\$ 230,140,000</b>	<b>\$ 268,749,000</b>

The project delivery method is Progressive Design Build (PDB). SMART is a transit district authorized to utilize this procurement methodology under SB 617. As a PDB project, the work will be undertaken in a phased approach.

**Phase 0:** Program supplement 04SMARTPS-07 (covering TIRCP Cycle 6 Augmentation funds for \$1.45m - 04 CP041A) provides for procurement support in development of an RFQ/RFP, PDB advisory services, project cost estimating, and environmental services. In September 2024, CoCo Consult was awarded a contract to provide procurement support, PDB advisory services, and cost estimating. In July 2025, WRA was awarded a contract for on-call environmental services. In April of 2025, SMART began the PDB procurement process for the Windsor to Healdsburg Extension Project, with proposals reviewed during summer 2025 and Phase 1 PDB contract award scheduled for September 2025. Services from these consultants will be ongoing throughout the life of the PDB project but will remain in this project scope. Additional Phase 0 staff and contract scope are funded through FTA and local sales tax.

**Phase 1:** This phase includes all design and engineering sufficient to establish a Guaranteed Maximum Price (GMP) for the project and support for the design and construction of civil, structures, systems, and architectural improvements for the project. This phase will also include environmental mitigation activities, and SMART staff costs including project management. Phase 1 is being funded with TIRCP Cycle 6 Augmentation funds allocated by CTC August 2025.

**Phase 1A:** Overlapping with a portion of Phase 1, this phase will consist of early work packages to include such things as site prep, utility relocation, and procurement of long lead items, though this is not an exhaustive list of potential early works packages. The PDB contractor will be identifying these early works packages and performing these services after open-book cost negotiations with SMART and the cost estimating consultant. In addition, we will be issuing a task order for construction management services on this project to one of our on-call

construction management contractors. Phase 1A is planned to be funded with a combination of TIRCP Cycle 6 Augmentation and TIRCP Cycle 7 funds. The detailed cost estimates for this Phase 1A work will be developed in collaboration with the contractor through the Phase 1 process.

**Phase 2:** This phase covers the final design and construction for the Healdsburg extension, which will be initiated by the open-book negotiation of a GMP for the complete project, which may be executed in one or more construction packages with the PDBE. The ultimate number of construction packages will depend on the contractor. In addition, SMART will be executing additional task orders for construction management and testing against on call contracts. Phase 1 work is planned to be funded with a combination of SCC, LPPC, TIRCP Cycle 7, FRA and Regional Bridge Tolls (RM3). The detailed cost estimates for this Phase 2 work will be developed in collaboration with the contractor through the Phase 1 process.

## VII. PROJECT SCHEDULE

The project is currently in the Phase 1 portion of progressive design build project delivery. SMART awarded a project cost estimator and program manager contract in October 2024 (Phase 0) and a Phase 1 progressive design build engineering contract in September 2025, each to be paid for with TIRCP Cycle 6 Augmentation funds. The Phase 1 schedule includes milestones of 35% and 65% design and will be accompanied with Early Works package contracts to advance demolition, permitting, long lead procurement items and targeting narrow construction season windows, such as for the Russian River Rail bridge. Subsequent Phase 2, “guaranteed maximum price” contracts will be awarded starting in 2026 for discrete final design plus construction elements. These amendments to the Phase 1 contract will take place at the SMART Board of Directors starting in early 2026 and continuing through 2027. See detailed contractor schedule estimate below.

SMART and the contractor will look for opportunities to streamline and expedite the project.

The project is anticipated to be open to the public in Quarter 4 of 2028.

Project Milestone	Existing	Proposed
Project Study Report Approved		
Begin Environmental (PA&ED) Phase		01/01/2000
Circulate Draft Environmental Document      Document Type		
Draft Project Report		11/21/2005
End Environmental Phase (PA&ED Milestone)		07/21/2008
Begin Design (PS&E) Phase		01/01/2025
End Design Phase (Ready to List for Advertisement Milestone)		03/01/2026
Begin Right of Way Phase		07/01/1990
End Right of Way Phase (Right of Way Certification Milestone)		03/01/2021
Begin Construction Phase (Contract Award Milestone)		04/01/2026
End Construction Phase (Construction Contract Acceptance Milestone)		12/31/2028
Begin Closeout Phase		05/01/2029
End Closeout Phase (Closeout Report)		12/31/2029



## VIII. RISKS

SMART is delivering the project via a Progressive Design Build process and applying lessons learned throughout the building of SMART's rail and pathway project to date. SMART is working with the Progressive Design Build contractor team to manage risks throughout delivery. Monthly meetings will occur to review risks and costs saving opportunities and the contractor includes an incentive program, with the objective to have all parties benefit from a lower cost/same quality and delivery of the needed scope of work. During the preconstruction phase of work, this program is to allow the work to show fiscal responsibility and to document the contractor's interest in helping and proof of results. During the construction phase, actual cost savings that are a direct result of the contractor and SMART acting together would be shared. SMART would retain 80% and the contractor 20% of the savings. This incentive program takes the place of formal Value Engineering process.

The contractor and SMART, through the procurement proposal process has proposed mitigations for project delivery risks they have identified, including: Securing Environmental Permits; Integrating Train Control System into SMART's existing E-ATC system; Managing Third-Party Utilities; Supporting Agreements for Private Crossings; and, Selecting the Preferred Bridge Type in the context of narrow permit work windows. These risks will be closely monitored and addressed in the monthly project risk management meetings and in the daily engagements between SMART and the contractor, who are co-located in the same offices as SMART as a condition of the contract.

## IV. EXTERNAL AGENCY COORDINATION AND PUBLIC OUTREACH

The SMART Rail and Pathway project has been the subject of decades of public outreach, including at SMART's Board of Director monthly meetings, advisory committees at the city/county/Sonoma County Transportation Authority levels, and a voter approved sales tax measure taken before the SMART District voters of Marin and Sonoma County in 2008 with nearly 70% approval to provide seed funds for the SMART Rail and Pathway system along a 70-mile corridor.

SMART has a board-adopted Public Participation Program, part of an overall Title VI program required by the Federal Transit Administration. The current Title VI program document can be found here, with the Public Participation Plan beginning on Page 33:

[https://www.sonomamarintrain.org/sites/default/files/Documents/SMART Title VI Program Sep2021 Final%209.15.21.pdf](https://www.sonomamarintrain.org/sites/default/files/Documents/SMART_Title_VI_Program_Sep2021_Final%209.15.21.pdf)

SMART engages in construction outreach activities, including door hanger and neighborhood information distribution, during project implementation. This is in addition to regular customer communications through social media and onboard trains during service hours. All construction outreach and printed communications are created in both English and Spanish.

As part of a series of Listening Forums SMART conducted virtually in 2020 and 2022, the “Planning for the Future” Listening Session specifically on the topic of SMART Extensions, held on April 20, 2022, had 54 participants. A parallel “Extensions” public survey was conducted with 203 responses and 13 follow up emails received in conjunction with the listening session. A presentation summarizing the session can be found at the [link here](#). The number one priority from participants was that SMART “complete extensions to Windsor, Healdsburg and Cloverdale”. SMART’s Windsor Extension opened late May 2025.

As required in SMART’s voter approved sales tax, SMART has a permanent Citizens Oversight Committee (COC), which contributes to and reviews SMART’s strategic planning and meets quarterly. In partnership with the COC, SMART recently completed its 2025-2030 Strategic Plan. The Strategic Planning Process had a robust public-engagement component, including six community workshops (five virtual and one in-person) during its 2025-2030 Strategic Planning Process that focused on both overall strategic direction and specific areas of service delivery such as service extensions, ridership, and pathways. At workshops, public comments were received through specialized software, priority-ranking exercises, and written comments. SMART’s 2025-2030 Strategic Plan community input and other elements can be found here (<https://www.sonomamarintrain.org/Strategic-Plan>), including a video recording of a March 14, 2024, workshop on Railway Extensions.

### Strategic Plan Goals

The Strategic Plan is organized around four strategic objective areas identified by the Board of Directors: Ridership, Pathways, Extensions, and Freight.

 <b>RIDERSHIP</b> INCREASE RIDERSHIP TO 5,000+ RIDERS PER DAY	 <b>EXTENSIONS</b> COMPLETE SYSTEM EXTENSIONS TO CLOVERDALE AND PURSUE PROJECT DEVELOPMENT OF EAST/WEST ALIGNMENT
 <b>PATHWAYS</b> DESIGN AND CONSTRUCT PLANNED PATHWAY, MAINTAIN EXISTING PATHWAY, AND ENHANCE USER EXPERIENCE	 <b>FREIGHT</b> ENSURE LONG-TERM SUSTAINABILITY OF FREIGHT OPERATIONS

In addition to SMART constituents, SMART works closely with local public works, planning and transit agencies on coordination and project implementation. Some of this work is direct one-on-one and some is through coordinating technical advisory committees. SMART hosts a systemwide SMART-Public Works Technical Advisory Committee that meets as needed quarterly, monthly or more often. Sonoma County Transportation and Climate Authority

(SCTCA) hosts monthly public works coordination meetings and in that context, jurisdictions have advocated for prioritization of this SMART Healdsburg extension project.

## VI. ADDITIONAL INFORMATION - SMART TECHNICAL CAPACITY

SMART is a Federal Transit Administration (FTA) Direct Grantee and is a direct recipient of Federal Railroad Administration (FRA) grant funds. SMART has a current Caltrans Master Agreement for State Funds, a current Caltrans Master Agreement for Federal Funds, a current Caltrans Master Agreement for State Transit and Intercity Rail Capital Program Funds, and several project supplemental agreements with Caltrans. The SMART Board of Directors has adopted a resolution providing the SMART General Manager with standing authorization to take necessary actions associated with acquiring State grant funds (Attachment A to this document), including for this Healdsburg Extension Project.

SMART’s project personnel include the following parties, with selected qualifications highlighted:

<b>Title</b>	<b>Name</b>	<b>Selected Qualifications</b>
General Manager	Eddy Cumins	<ul style="list-style-type: none"> <li>• SMART 2021-2025</li> <li>• Utah Transit Authority 2011-2021, Chief Operating Officer</li> <li>• US Air Force 1991-2011</li> </ul>
Chief Financial Officer	Heather McKillop	<ul style="list-style-type: none"> <li>• SMART 2020-2025</li> <li>• Denver Regional Transit District 2015-2020, Chief Financial Officer and Assistant General Manager of Finance and Administration</li> <li>• Colorado Department of Revenue 2011-2015, Deputy Executive Director</li> <li>• Colorado Department of Transportation 2005-2010, Chief Financial Officer</li> </ul>
Chief Engineer	Bill Gamlen	<ul style="list-style-type: none"> <li>• SMART 2009-2025</li> <li>• Transportation Authority of Marin, Project Delivery Manager, 2007-2009</li> <li>• Gannet Fleming, Inc., FTA Project Management Oversight on BART Task Orders, 2005-2007</li> <li>• SF Muni, 1991-2005, Project Manager Third Street Light Rail and Others</li> </ul>
Manager of Train Control Systems	Aaron Parkes	<ul style="list-style-type: none"> <li>• SMART 2018-2025</li> <li>• LTK Engineering Services 2008-2018</li> <li>• Twin City Signal 1996-2008</li> </ul>
Operations Manager	Marc Bader	<ul style="list-style-type: none"> <li>• SMART 2015-2025, Operations Manager</li> <li>• Genesee &amp; Wyoming Inc. 2013-2015, Vice President Maintenance</li> <li>• RailAmerica 2003-2013, Director of Line Maintenance</li> </ul>
Grants Manager	Joanne Parker	<ul style="list-style-type: none"> <li>• SMART 2010-2025, Grants &amp; Legislative Affairs Manager</li> <li>• Santa Rosa CityBus 2007-2010, Transit Planner &amp; Grants Analyst</li> <li>• BART 1999-2007, Principal Financial Analyst, Capital Development and Control</li> </ul>

## VII. ADDITIONAL INFORMATION - ZERO EMISSION SWITCHER LOCOMOTIVE

### Project Description/Scope

This project is for procurement and manufacture of a Zero Emission Switcher Locomotive for use on the SMART publicly owned railroad. This could be for short-line freight rail or passenger rail services, such as excursion service or other passenger supportive service. The technology associated with the vehicles will be determined dependent on available manufacturers and performance measures for the vehicle issued at the time of procurement and is dependent on industry conditions. Current possible fuel types include one or more of the following: battery electric and hydrogen.

### Benefits and Outcomes

This Zero Emission Switcher Locomotive component of the SMART Healdsburg Extension Project has performance indicators and measures co-mingled within the Healdsburg Extension Project performance indicators (shown earlier on page 11). No additional quantitative benefit-cost or other performance measure evaluation was done separately for this Zero Emission Switcher Locomotive.

### Purpose and Need

The Zero Emission Switcher Locomotive could provide additional freight rail capacity for the short line system. SMART is planned to have three locomotives total with this acquisition and would be able to position one at the freight rail yard in Schellville, one midpoint in the system in Petaluma and one in the far north in Cloverdale once built out. This positioning will allow efficient freight transport within SMART's single-track passenger and freight rail system. In addition, this switcher locomotive will allow SMART staff to begin to experience zero emission locomotive technology capabilities. This initial zero emission effort will aide SMART in preparation for technology changes on the passenger side of the rail service. Finally, this switcher locomotive could be used to facilitate capacity in SMART passenger maintenance functions, for example to deliver equipment, and to potentially facilitate passenger excursion service. This Zero Emission Switcher could also provide emergency coverage of the rail system, such as having an emergency back-up vehicle to move SMART revenue cars during failures. This vehicle could also be used to expand critical onboard passenger capacity, should SMART acquire additional non-powered passenger rail cars to alleviate current onboard passenger crowding conditions, among other purposes not identified today.

### Fund Plan and Budget

The Zero Emission Switcher Locomotive funding plan includes \$6 million in SCCP funds at 100% reimbursement rate for vehicle procurement, manufacture, delivery and testing.

### Schedule

The schedule for the Zero Emission Switcher Locomotive follows the parameters of the schedule estimated for the Healdsburg Extension with vehicle delivery anticipated by the end of July 2028, before the December 2028 revenue service date estimated for Healdsburg service. The procurement for the locomotive will be separately implemented than the Healdsburg Extension procurement.

## VII. ATTACHMENTS

### Attachment A - Board Grant Authorizing Resolution

**Resolution No. 2010-16 Sonoma-Marin Area Rail Transit District  
San Rafael, California  
October 20, 2010**

**RESOLUTION OF THE BOARD OF DIRECTORS OF THE SONOMA-MARIN  
AREA RAIL TRANSIT DISTRICT AUTHORIZING THE FILING OF  
APPLICATIONS, PROVISION OF SUPPORTING DOCUMENTS, AND  
EXECUTION OF FUNDING AGREEMENTS FOR AVAILABLE FUNDS FROM  
THE U. S. GOVERNMENT, THE STATE OF CALIFORNIA, AND OTHER  
ENTITIES**

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**WHEREAS**, the Secretary of the U. S. Department of Transportation, the California Department of Transportation, the California Transportation Commission, the Metropolitan Transportation Commission, the Sonoma County Transportation Authority, the Transportation Authority of Marin, are authorized to make grants for public infrastructure projects; and

**WHEREAS**, public and private entities other than those explicitly listed in this resolution periodically make funding available for SMART District projects and programs; and

**WHEREAS**, the SMART District has eligible planning, capital, training, demonstration, and/or operating assistance projects, as outlined in the 2009 SMART Strategic Plan and all subsequent amendments to that document; and

**WHEREAS**, all contracts and grant agreements for financial assistance will impose certain standard obligations upon the applicant, including the provision by the applicant of the project(s)' local share costs; and

**WHEREAS**, it would be in the best interests of the SMART District for the General Manager to have standing authorization to apply, on behalf of the District, for funds from public and private entities and to file necessary documents and execute funding agreements;

**NOW, THEREFORE, BE IT RESOLVED** by the Board of Directors of the Sonoma Marin Area Rail Transit District:

1. That the SMART District General Manager, or designee, is authorized to execute and file all applications on behalf of the SMART District for funds for District projects and activities with any agency of the United States Government or the State of California, and with any other public entity.
2. That the General Manager, or designee, is authorized to execute and file with such applications any assurance or other document required by the public or private funding entity.

DCNJ-03343

3. That the General Manager, or designee, is authorized to furnish such additional information as the public or private funding entity may require in connection with the application.
4. That the General Manager, or designee, is authorized to execute all funding agreements on behalf of the SMART District with all such public funding entities.
5. That the Board of Directors will receive timely reports on the scope, schedule, budget and any non-standard requirements of any grant agreement entered into with public funding entities.
6. That the General Manager, or designee, is authorized to execute and file applications on behalf of the SMART District for funds for District projects and activities with any private entity, but execution of funding agreements with a private entity requires separate approval of the SMART Board of Directors.

**THE FOREGOING RESOLUTION** was moved by Director McGlashan, seconded by Director Boro and approved by the following vote:

**DIRECTORS:**

Director Arnold	Aye	Director Brown	Aye
Director Boro	Aye	Director Eddie	Aye
Director Fudge	Aye	Director Kellner	Aye
Director Lundstrom	Aye	Director Mackenzie	Absent
Director McGlashan	Aye	Director Pahre	Aye
Director Russell	Aye	Director Zane	Aye

Ayes: 11                      Noes: 0                      Absent: 1                      Abstain: 0

**SO ORDERED**

I, the undersigned, certify that the foregoing resolution was duly adopted at a regular meeting of the Sonoma-Marín Area Rail Transit District held on October 20, 2010.

  
 Lillian Hames, General Manager  
 Sonoma-Marín Area Rail Transit District

## Attachment B - PPRs

Amendment (Existing Project) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO						Date	10/21/2025 18:58:03
Programs	<input type="checkbox"/> LPP-C	<input type="checkbox"/> LPP-F	<input type="checkbox"/> SCCP	<input type="checkbox"/> TCEP	<input type="checkbox"/> STIP	<input type="checkbox"/> Other	
District	EA	Project ID	PPNO	Nominating Agency			
75			2364N	Caltrans HQ			
County	Route	PM Back	PM Ahead	Co-Nominating Agency			
Sonoma County				Metropolitan Transportation Commission			
				MPO	Element		
				MTC	Rail		
Project Manager/Contact			Phone	Email Address			
Joanne Parker			707-794-3062	jparker@sonomamarintrain.org			

**Project Title**

Sonoma-Marine Area Rail Transit District (SMART) Healdsburg Extension Project

**Location (Project Limits), Description (Scope of Work)**

In Sonoma County between Town of Windsor SMART Station (MP63) to the Healdsburg northern city limits at Lytton Road (MP72), including unincorporated Sonoma County.

The SMART Healdsburg Extension Project will complete construction of the civil and systems work for the rail and pathway project for approximately 9- miles of Class IV mainline track, six bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART's dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, twenty one at-grade crossings, a paved non-motorized bicycle/pedestrian facility, new broadband capacity for public agencies, federally mandated Positive Train Control (PTC).

Component	Implementing Agency
PA&ED	Sonoma Marin Area Rail Transit
PS&E	Sonoma Marin Area Rail Transit
Right of Way	Sonoma Marin Area Rail Transit
Construction	Sonoma Marin Area Rail Transit

**Legislative Districts**

Assembly:	2,4,12	Senate:	2,3	Congressional:	2,4
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Project Milestone	Existing	Proposed
Project Study Report Approved		
Begin Environmental (PA&ED) Phase	01/01/2000	01/01/2000
Circulate Draft Environmental Document <span style="float: right;">Document Type</span>		
Draft Project Report	11/21/2005	11/21/2005
End Environmental Phase (PA&ED Milestone)	07/21/2008	07/21/2008
Begin Design (PS&E) Phase	01/01/2025	01/01/2025
End Design Phase (Ready to List for Advertisement Milestone)	03/01/2026	03/01/2026
Begin Right of Way Phase	07/01/1990	07/01/1990
End Right of Way Phase (Right of Way Certification Milestone)	03/01/2021	03/01/2021
Begin Construction Phase (Contract Award Milestone)	04/01/2026	04/01/2026
End Construction Phase (Construction Contract Acceptance Milestone)	12/31/2028	12/31/2028
Begin Closeout Phase	05/01/2029	05/01/2029
End Closeout Phase (Closeout Report)	12/31/2029	12/31/2029

Date 10/21/2025 18:58:03

**Purpose and Need**

This project will address many challenges in the northern San Francisco Bay Area, including providing high quality transit travel options, multimodal connectivity, rehabilitating existing underutilized, publicly owned transportation infrastructure, supporting transit oriented and affordable housing development, reducing vehicle miles traveled, supporting economic development through passenger and freight rail service and the Great Redwood Trail, workforce transport and bringing tourists to the region, each with lower greenhouse gas emissions impact than current infrastructure allows. SMART's average passenger trip length is 20-22 miles with significant percentages of riders accessing the system through bus, bicycle and walking for the first and last mile. The project also provides greater emergency resilience to enable delivery of supplies and personnel and evacuation of people, including rail vehicle acquisition. Finally, the project includes continuing successful public-private partnership between SMART and the internet service provider Sonic to bring high speed fiber optic, broadband internet services to communities along the SMART rail corridor and improve public access to telecommunications services throughout SMART's and Sonic's service areas.

NHS Improvements <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Roadway Class NA	Reversible Lane Analysis <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Inc. Sustainable Communities Strategy Goals <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Reduce Greenhouse Gas Emissions <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

<b>Project Outputs</b>			
Category	Outputs	Unit	Total
Rail/ Multi-Modal	Grade separations/ rail crossing improvemnets	EA	21
Rail/ Multi-Modal	New stations	EA	1
Rail/ Multi-Modal	Miles of rehabilitated track	Miles	9
Active Transportation	Pedestrian/Bicycle facilities miles constructed	Miles	5.5

Date 10/21/2025 18:58:03

#### Additional Information

The project delivery method is Progressive Design Build (PDB). SMART is a transit district authorized to utilize this procurement methodology under SB 617. As a PDB project, the work will be undertaken in a phased approach.

Phase 0: Program supplement 04SMARTPS-07 (covering TIRCP Cycle 6 Augmentation funds for \$1.45m - 04 CP041A) provides for procurement support in development of an RFQ/RFP, PDB advisory services, project cost estimating, and environmental services. In September 2024, CoCo Consult was awarded a contract to provide procurement support, PDB advisory services, and cost estimating. In July 2025, WRA was awarded a contract for on-call environmental services. In April of 2025, SMART began the PDB procurement process for the Windsor to Healdsburg Extension Project, with proposals reviewed during summer 2025 and Phase 1 PDB contract award scheduled for September 2025. Services from these consultants will be ongoing throughout the life of the PDB project but will remain in this project scope. Additional Phase 0 staff and contract scope are funded through FTA and local sales tax.

Phase 1: This phase includes all design and engineering sufficient to establish a Guaranteed Maximum Price (GMP) for the project and support for the design and construction of civil, structures, systems, and architectural improvements for the project. This phase will also include environmental mitigation activities, and SMART staff costs including project management. Phase 1 is being funded with TIRCP Cycle 6 Augmentation funds allocated by CTC August 2025.

Phase 1A: Overlapping with a portion of Phase 1, this phase will consist of early work packages to include such things as site prep, utility relocation, and procurement of long lead items, though this is not an exhaustive list of potential early works packages. The PDB contractor will be identifying these early works packages and performing these services after open-book cost negotiations with SMART and the cost estimating consultant. In addition, we will be issuing a task order for construction management services on this project to one of our on-call construction management contractors. Phase 1A is planned to be funded with a combination of TIRCP Cycle 6 Augmentation and TIRCP Cycle 7 funds.

Phase 2: This phase covers the final design and construction for the Healdsburg extension, which will be initiated by the open-book negotiation of a GMP for the complete project, which may be executed in one or more construction packages with the PDDBE. The ultimate number of construction packages will depend on the contractor. In addition, SMART will be executing additional task orders for construction management and testing against on call contracts. Phase 1 work is planned to be funded with a combination of SCC, LPPC, TIRCP Cycle 7, FRA and Regional Bridge Tolls (RM3).

This project is located in a State-designated AB1550 Low Income community and there are six Federally recognized Tribal Nations located in Sonoma County, including the most recent land to be taken into trust near the future Windsor SMART Station. This project is included in State and Regional Plans, including the State Rail Plan and the Metropolitan Transportation Commission's Plan Bay Area 2050 (October 2024 amendment).

Performance Indicators and Measures						
Measure	Required For	Indicator/Measure	Unit	Build	Future No Build	Change
Congestion Reduction	LPPC, SCCP, LPPF	Change in Daily Vehicle Miles Travelled	Miles	3,996,000	4,089,684	-93,684
			VMT per Capita	0	0	0
	LPPC, SCCP, LPPF	Person Hours of Travel Time Saved (Only 'Change' required)	Person Hours	598,197.6	435,090	163,107.6
			Hours per Capita	0	0	0
System Reliability (Freight)	LPPC, SCCP, LPPF	Peak Period Travel Time Reliability Index (Only 'No Build' Required)	Index	0	0	0
	LPPC, SCCP, LPPF	Level of Transit Delay (if required)	% "On-time"	18.4	40.02	-21.62
Air Quality & GHG (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Particulate Matter	PM 2.5 Tons	0	4	-4
			PM 10 Tons	0	4	-4
	LPPC, SCCP, TCEP, LPPF	Carbon Dioxide (CO2)	Tons	0	193,717	-193,717
	LPPC, SCCP, TCEP, LPPF	Volatile Organic Compounds (VOC)	Tons	0	15	-15
	LPPC, SCCP, TCEP, LPPF	Sulphur Dioxides (SOx)	Tons	0	2	-2
	LPPC, SCCP, TCEP, LPPF	Carbon Monoxide (CO)	Tons	0	351	-351
	LPPC, SCCP, TCEP, LPPF	Nitrogen Oxides (NOx)	Tons	0	172	-172
Safety	LPPC, SCCP, TCEP, LPPF	Number of Fatalities	Number	7	8	-1
	LPPC, SCCP, TCEP, LPPF	Fatalities per 100 Million VMT	Number	0.15997	0.17885	-0.01888
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries	Number	72	74	-2
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries per 100 Million VMT	Number	1.64548	1.65244	-0.00696
Economic Development	LPPC, SCCP, TCEP, LPPF	Jobs Created (Only 'Build' Required)	Number	2,496	0	2,496
Cost Effectiveness (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Cost Benefit Ratio	Ratio	5.3	0	5.3
Vehicle Volume	LPPC, LPPF, SCCP	Existing Average Annual Vehicle Volume on Project Segment	Number	0	0	0
	LPPC, LPPF, SCCP	Estimated Year 20 Average Annual Vehicle Volume on Project Segment with Project	Number	0	0	0

District	County	Route	EA	Project ID	PPNO
75	Sonoma County				2364N

Project Title  
 Sonoma-Marín Area Rail Transit District (SMART) Healdsburg Extension Project

Existing Total Project Cost (\$1,000s)									Implementing Agency
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E		1,800	1,450					3,250	Sonoma Marin Area Rail Transit
R/W SUP (CT)									Sonoma Marin Area Rail Transit
CON SUP (CT)									Sonoma Marin Area Rail Transit
R/W									Sonoma Marin Area Rail Transit
CON				265,500				265,500	Sonoma Marin Area Rail Transit
<b>TOTAL</b>		1,800	1,450	265,500				268,750	

Proposed Total Project Cost (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E		1,800	1,450					3,250	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				265,500				265,500	
<b>TOTAL</b>		1,800	1,450	265,500				268,750	

Fund #1:	Local Funds - Bridge Tolls - Regional Measure 3 (Committed)								Program Code
	Existing Funding (\$1,000s)								20.10.400.100
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Metropolitan Transportation Commiss Voter approved measure project.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				40,000				40,000	
<b>TOTAL</b>				40,000				40,000	

Proposed Funding (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				40,000				40,000	
<b>TOTAL</b>				40,000				40,000	

Fund #2:	FTA Funds - Community Project Funding (Committed)								Program Code
Existing Funding (\$1,000s)									FTA-TRANSIT
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									
PS&E		1,800						1,800	Congressionally directed community project awarded 2023 appropriations.
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON									
<b>TOTAL</b>		1,800						1,800	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E		1,800						1,800	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON									
<b>TOTAL</b>		1,800						1,800	

Fund #3:	Federal Disc. - Consolidated Rail Infrastructure Safety Improvement (Committed)								Program Code
Existing Funding (\$1,000s)									20.XX.400.300
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									
PS&E									Federal Railroad Administration - Awarded 9/2023
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				28,140				28,140	
<b>TOTAL</b>				28,140				28,140	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				28,140				28,140	
<b>TOTAL</b>				28,140				28,140	

Fund #4:	State SB1 SCCP - Solution for Congested Corridors Program (Committed)								Program Code
Existing Funding (\$1,000s)									30.20.110.000
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E									Program Code 30.20.110.000
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				56,000				56,000	
TOTAL				56,000				56,000	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				56,000				56,000	
TOTAL				56,000				56,000	

Fund #5:	Other State - Transit and Intercity Rail Capital Program (TIRCP) (Committed)								Program Code
Existing Funding (\$1,000s)									20.30.207.811
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									California Transportation Commissio Cycle 6 Augmentation. Allocated June 2024 for Phase 0 work and August 2025 for Phase 1 work.
PS&E			1,450					1,450	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				33,360				33,360	
TOTAL			1,450	33,360				34,810	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E			1,450					1,450	
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				33,360				33,360	
TOTAL			1,450	33,360				34,810	

Fund #6:	Other State - Transit and Intercity Rail Capital Program (TIRCP) (Committed)								Program Code
Existing Funding (\$1,000s)									20.30.207.811
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									California Transportation Commissio Cycle 7, to be used for Phase 1A and Phase 2 work.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				81,000				81,000	
TOTAL				81,000				81,000	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				81,000				81,000	
TOTAL				81,000				81,000	

Fund #7:	Local Funds - SON Co Sales Tax (Committed)								Program Code
Existing Funding (\$1,000s)									20.10.400.100
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma County Transportation Auth Measure M Rail to be used for Phase 0, Phase 1, Phase 1A and Phase 2 work, as needed.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				2,000				2,000	
TOTAL				2,000				2,000	

Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				2,000				2,000	
TOTAL				2,000				2,000	

Fund #8:	State SB1 LPP - Local Partnership Program - Competitive program (Committed)								Program Code
Existing Funding (\$1,000s)									30.20.724.200
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma Marin Area Rail Transit Programmed June 2025. Planned to fund Phase 2 work.
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				25,000				25,000	
TOTAL				25,000				25,000	
Proposed Funding (\$1,000s)									Notes
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				25,000				25,000	
TOTAL				25,000				25,000	

Amendment (Existing Project) <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO					Date	10/21/2025 18:56:19
Programs <input type="checkbox"/> LPP-C <input type="checkbox"/> LPP-F <input type="checkbox"/> SCCP <input type="checkbox"/> TCEP <input type="checkbox"/> STIP <input type="checkbox"/> Other						
District	EA	Project ID	PPNO	Nominating Agency		
75			2364P	Caltrans HQ		
County	Route	PM Back	PM Ahead	Co-Nominating Agency		
Sonoma County				Metropolitan Transportation Commission		
				MPO	Element	
				MTC	Rail	
Project Manager/Contact			Phone	Email Address		
Joanne Parker			707-794-3062	jparker@sonomamarintrain.org		

**Project Title**  
 Sonoma-Marine Area Rail Transit District (SMART) Healdsburg Extension Project (Zero Emission Switcher Locomotive - ZEV)

**Location (Project Limits), Description (Scope of Work)**  
 In Sonoma County between Town of Windsor SMART Station to the City of Healdsburg. The ZEV will be used throughout the SMART System.

The SMART Healdsburg Extension Project will complete construction of the civil and systems work for the rail and pathway project for just over 5.5 miles of Class IV mainline track, six bridges including the major Healdsburg Russian River rail bridge replacement, freight spurs with systems where the business case is justified, necessary upgrades to SMART's dispatch system and rail operations center, one station with amenities, gauntlet tracks at the station to accommodate freight train passage, fourteen at-grade crossings, a paved non-motorized bicycle/pedestrian facility, new broadband capacity for public agencies, federally mandated Positive Train Control (PTC), capacity increasing rail vehicles including through acquisition of a Zero Emission Switcher Locomotive for freight or excursion services.

This PPR covers only the Zero Emission Switcher.

Component	Implementing Agency
PA&ED	Sonoma Marin Area Rail Transit
PS&E	Sonoma Marin Area Rail Transit
Right of Way	Sonoma Marin Area Rail Transit
Construction	Sonoma Marin Area Rail Transit

<b>Legislative Districts</b>					
Assembly:	2,4,12	Senate:	2,3	Congressional:	2,4

Project Milestone	Existing	Proposed
Project Study Report Approved		
Begin Environmental (PA&ED) Phase	01/01/2000	01/01/2000
Circulate Draft Environmental Document <span style="float: right;">Document Type</span>		
Draft Project Report	11/21/2005	11/21/2005
End Environmental Phase (PA&ED Milestone)	07/21/2008	07/21/2008
Begin Design (PS&E) Phase	01/01/2025	01/01/2025
End Design Phase (Ready to List for Advertisement Milestone)	03/01/2026	03/01/2026
Begin Right of Way Phase	07/01/1990	07/01/1990
End Right of Way Phase (Right of Way Certification Milestone)	03/01/2021	03/01/2021
Begin Construction Phase (Contract Award Milestone)	04/01/2026	04/01/2026
End Construction Phase (Construction Contract Acceptance Milestone)	07/31/2028	07/31/2028
Begin Closeout Phase	10/31/2028	10/31/2028
End Closeout Phase (Closeout Report)	01/26/2029	01/26/2029

Date 10/21/2025 18:56:19

**Purpose and Need**

This project will address many challenges in the northern San Francisco Bay Area, including providing high quality transit travel options, multimodal connectivity, rehabilitating existing underutilized, publicly owned transportation infrastructure, supporting transit oriented and affordable housing development, reducing vehicle miles traveled, supporting economic development through passenger and freight rail service and the Great Redwood Trail, workforce transport and bringing tourists to the region, each with lower greenhouse gas emissions impact than current infrastructure allows. SMART's average passenger trip length is 22-25 miles with significant percentages of riders accessing the system through bus, bicycle and walking for the first and last mile. The project also provides greater emergency resilience to enable delivery of supplies and personnel and evacuation of people, including rail vehicle acquisition. Finally, the project includes continuing successful public-private partnership between SMART and the internet service provider Sonic to bring high speed fiber optic, broadband internet services to communities along the SMART rail corridor and improve public access to telecommunications services throughout SMART's and Sonic's service areas.

The Zero Emission Switcher Locomotive will provide additional freight rail capacity for the entire system. SMART will have three locomotives total with this acquisition and will be able to position one at the freight rail yard in Schellville, one midpoint in the system in Petaluma and one in the far north in Cloverdale once built out. This positioning will allow efficient freight transport within SMART's single track passenger and freight rail system. In addition, this switcher locomotive will allow SMART staff to begin to experience zero emission locomotive technology capabilities. This initial zero emission effort will aide SMART in preparation for technology changes on the passenger side of the rail service.

NHS Improvements <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Roadway Class NA	Reversible Lane Analysis <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
Inc. Sustainable Communities Strategy Goals <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	Reduce Greenhouse Gas Emissions <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	

**Project Outputs**

Category	Outputs	Unit	Total
Rail/ Multi-Modal	Rail/Transit Equipment	EA	1

Date 10/21/2025 18:56:19

**Additional Information**

This Zero Emission Switcher Locomotive component of the SMART Healdsburg Extension Project has performance indicators and measures co-mingled within the Healdsburg Extension Project performance indicators and are not shown separately in this ePPR. The milestones of this Zero Emission Switcher Locomotive component are shown as the milestones of the Healdsburg Extension Project.

This project is located in a State-designated AB1550 Low Income community and there are six Federally recognized Tribal Nations located in Sonoma County, including the most recent land to be taken into trust near the future Windsor SMART Station. This project is included in State and Regional Plans, including the State Rail Plan and the Metropolitan Transportation Commission's Plan Bay Area 2050 (October 2024 amendment). SMART's expansion northward has been endorsed through Plan Bay Area Tribal consultation process.

A Benefit-Cost Analysis was not completed for this component so therefore there are no Performance Measures to fill out and that section is left blank here.

Performance Indicators and Measures						
Measure	Required For	Indicator/Measure	Unit	Build	Future No Build	Change
Congestion Reduction	LPPC, SCCP, LPPF	Change in Daily Vehicle Miles Travelled	Miles	0	0	0
			VMT per Capita	0	0	0
	LPPC, SCCP, LPPF	Person Hours of Travel Time Saved (Only 'Change' required)	Person Hours	0	0	0
			Hours per Capita	0	0	0
System Reliability (Freight)	LPPC, SCCP, LPPF	Peak Period Travel Time Reliability Index (Only 'No Build' Required)	Index	0	0	0
	LPPC, SCCP, LPPF	Level of Transit Delay (if required)	% "On-time"	0	0	0
Air Quality & GHG (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Particulate Matter	PM 2.5 Tons	0	0	0
			PM 10 Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Carbon Dioxide (CO2)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Volatile Organic Compounds (VOC)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Sulphur Dioxides (SOx)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Carbon Monoxide (CO)	Tons	0	0	0
	LPPC, SCCP, TCEP, LPPF	Nitrogen Oxides (NOx)	Tons	0	0	0
Safety	LPPC, SCCP, TCEP, LPPF	Number of Fatalities	Number	0	0	0
	LPPC, SCCP, TCEP, LPPF	Fatalities per 100 Million VMT	Number	0	0	0
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries	Number	0	0	0
	LPPC, SCCP, TCEP, LPPF	Number of Serious Injuries per 100 Million VMT	Number	0	0	0
Economic Development	LPPC, SCCP, TCEP, LPPF	Jobs Created (Only 'Build' Required)	Number	0	0	0
Cost Effectiveness (only 'Change' required)	LPPC, SCCP, TCEP, LPPF	Cost Benefit Ratio	Ratio	0	0	0
Vehicle Volume	LPPC, LPPF, SCCP	Existing Average Annual Vehicle Volume on Project Segment	Number	0	0	0
	LPPC, LPPF, SCCP	Estimated Year 20 Average Annual Vehicle Volume on Project Segment with Project	Number	0	0	0

District	County	Route	EA	Project ID	PPNO
75	Sonoma County				2364P

**Project Title**  
 Sonoma-Marin Area Rail Transit District (SMART) Healdsburg Extension Project (Zero Emission Switcher Locomotive - ZEV)

Existing Total Project Cost (\$1,000s)									Implementing Agency
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E									Sonoma Marin Area Rail Transit
R/W SUP (CT)									Sonoma Marin Area Rail Transit
CON SUP (CT)									Sonoma Marin Area Rail Transit
R/W									Sonoma Marin Area Rail Transit
CON				6,000				6,000	Sonoma Marin Area Rail Transit
<b>TOTAL</b>				6,000				6,000	

Proposed Total Project Cost (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				6,000				6,000	
<b>TOTAL</b>				6,000				6,000	

<b>Fund #1:</b>	State SB1 SCCP - Solution for Congested Corridors Program (Committed)								Program Code
	Existing Funding (\$1,000s)								30.20.110.000
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	Funding Agency
E&P (PA&ED)									Sonoma Marin Area Rail Transit
PS&E									Project number 30.20.110.000
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				6,000				6,000	
<b>TOTAL</b>				6,000				6,000	

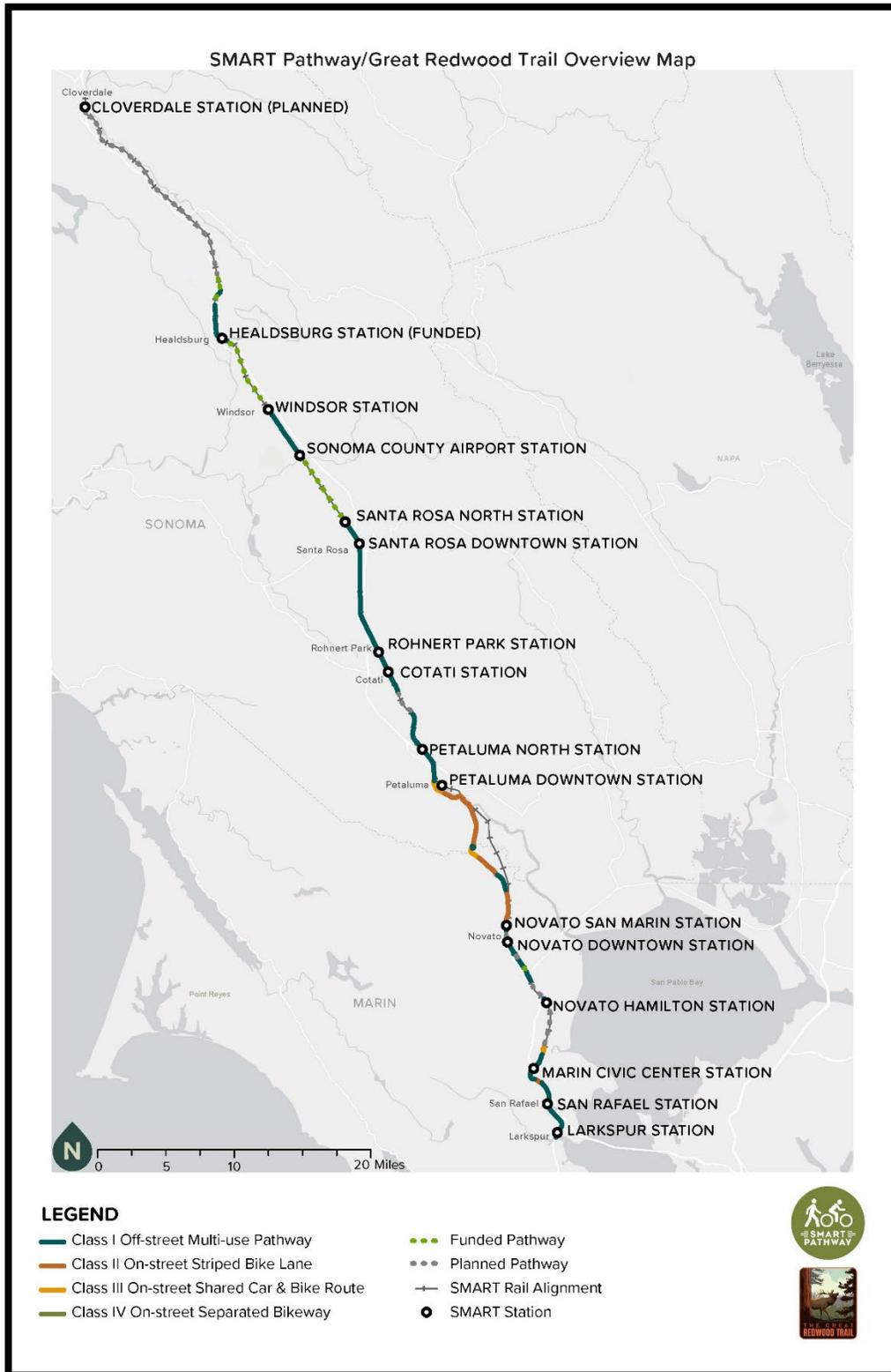
Proposed Funding (\$1,000s)									Notes
Component	Prior	23-24	24-25	25-26	26-27	27-28	28-29+	Total	
E&P (PA&ED)									
PS&E									
R/W SUP (CT)									
CON SUP (CT)									
R/W									
CON				6,000				6,000	
<b>TOTAL</b>				6,000				6,000	

# Attachment C - Project Maps

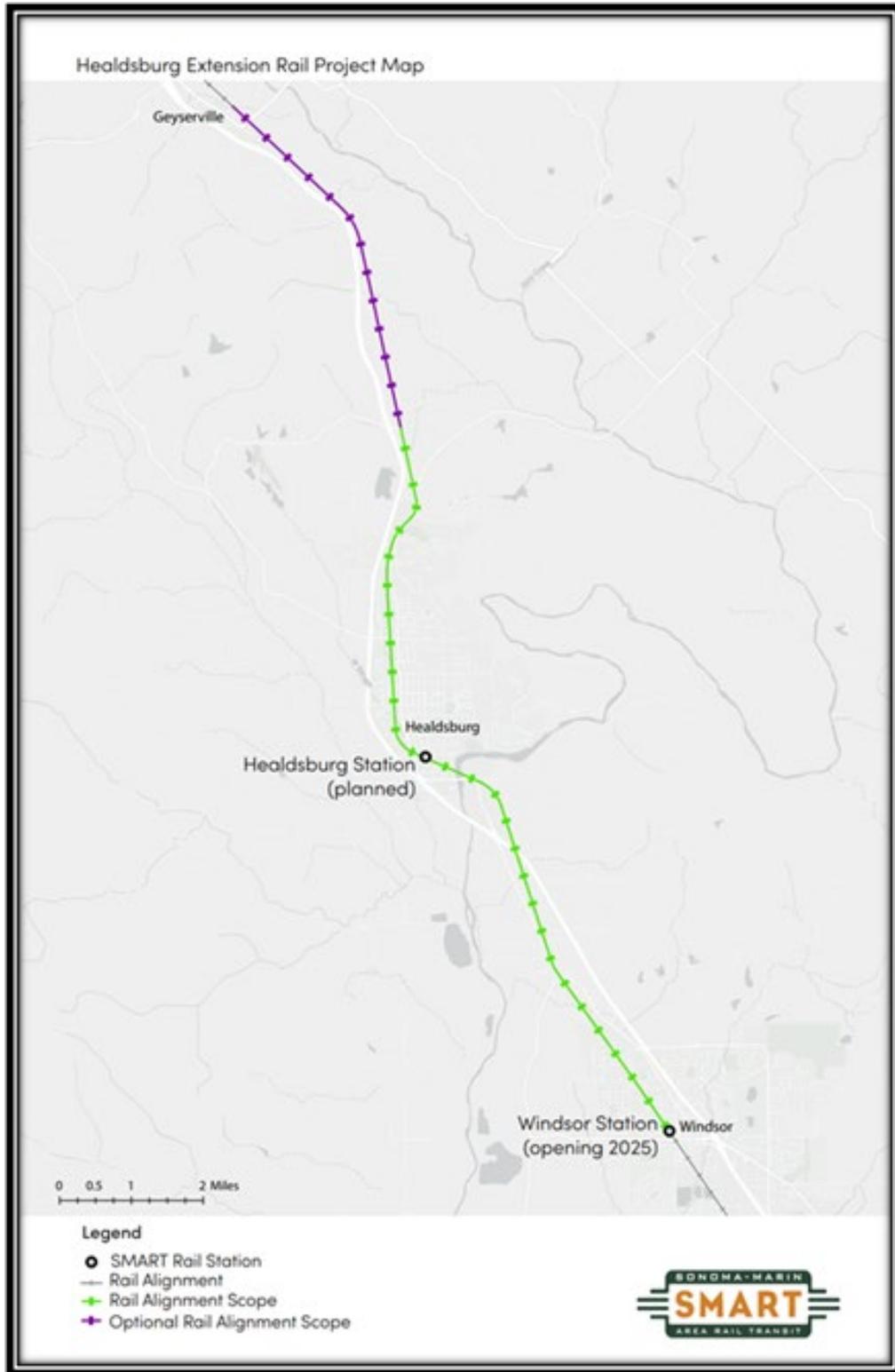
## Systemwide Map



# SMART Pathway/Great Redwood Trail Corridor Map



Project Limit Map (Healdsburg Extension is Green Track)



## Attachment D – Project Outcomes/Performance Metrics

<b>Existing Average Annual Vehicle Volume on Project Segment</b>		N/A				
<b>Estimated Year 20 Average Annual Vehicle Volume on Project Segment with Project</b>		N/A				
<b>Measure</b>	<b>Metric</b>	<b>Project Type</b>	<b>Build</b>	<b>Future No Build</b>	<b>Change</b>	<b>Increase/Decrease</b>
<b>Congestion Reduction</b>	Change in Daily Vehicle Miles Traveled (VMT)	All	3,996,000	4,089,684	-93,684	Decrease
	Person Hours of Travel Time Saved		598,197.6	435,090	163,107.6	Increase
	(Optional) Change in Daily Vehicle Hours of Delay	Highway				
	(Optional) Percent Change in Non-Single Occupancy Vehicle Travel	Local Road, Highway				
	(Optional) Per Capita and Total Person Hours of Delay per Year					
	(Optional) Other Information	All				
<b>Throughput</b>	(Optional) Peak Period Person Throughput – by applicable mode	All				
	(Optional) Passengers Per Vehicle Service Hour	Transit Rail and Transit Bus				
	(Optional) Other Information	All				
<b>System Reliability</b>	Peak Period Travel Time Reliability Index (“No Build” Number Only)	National and State Highway System Only				
	Level of Transit Delay	Transit Rail and Transit Bus	18.4	40.02	-21.62	Decrease
	(Optional) Other Information	All				

Measure	Metric	Project Type	Build	Future No Build	Change	Increase/Decrease
<b>Safety</b>	Number of Fatalities	All	7	8	-1	Decrease
	Rate of Fatalities per 100 Million VMT		0.15997	0.17885	-0.01888	Decrease
	Number of Serious Injuries		72	74	-2	Decrease
	Rate of Serious Injuries per 100 Million VMT		1.64548	1.65244	-0.00696	Decrease
	(Optional) Number of Non-Motorized Fatalities and Non-Motorized Serious Injuries					
	(Optional) Other Information					
	(Optional) Number or Rate of Property Damage Only Collisions	Local Road, Highway				
	(Optional) Number or Rate of Non-Serious Injury Collisions					
	(Optional) Accident Cost Savings					
<b>Economic Development</b>	Jobs Created	All	2,496	0	2,496	Increase
	(Optional) Other Information					
<b>Air Quality and Greenhouse Gases</b>	Particulate Matter (PM 10)	All	0	4	-4	Decrease
	Particulate Matter (PM 2.5)		0	4	-4	Decrease
	Carbon Dioxide (CO2)		0	193,717	-193,717	Decrease
	Volatile Organic Compounds (VOC)		0	15	-15	Decrease
	Sulphur Oxides (SOx)		0	2	-2	Decrease
	Carbon Monoxide (CO)		0	351	-351	Decrease
	Nitrogen Oxides (NOx)		0	172	-172	Decrease

Measure	Metric	Project Type	Build	Future No Build	Change	Increase/ Decrease
<b>Accessibility</b>	(Optional) Number of Jobs Accessible by Mode	All				
	(Optional) Access to Key Destinations by Mode	All				
	(Optional) Percentage of Population Defined as Low Income or Disadvantaged within ½ mile of a rail station, ferry terminal, or high-frequency bus stop	Transit Rail and Transit Bus				
	(Optional) Other Information	All				
<b>Cost Effectiveness</b>	Cost-Benefit Ratio	All	5.3	0	5.3	Increase
	(Optional) Other Information					

## Attachment E - SMART Project SFEIR

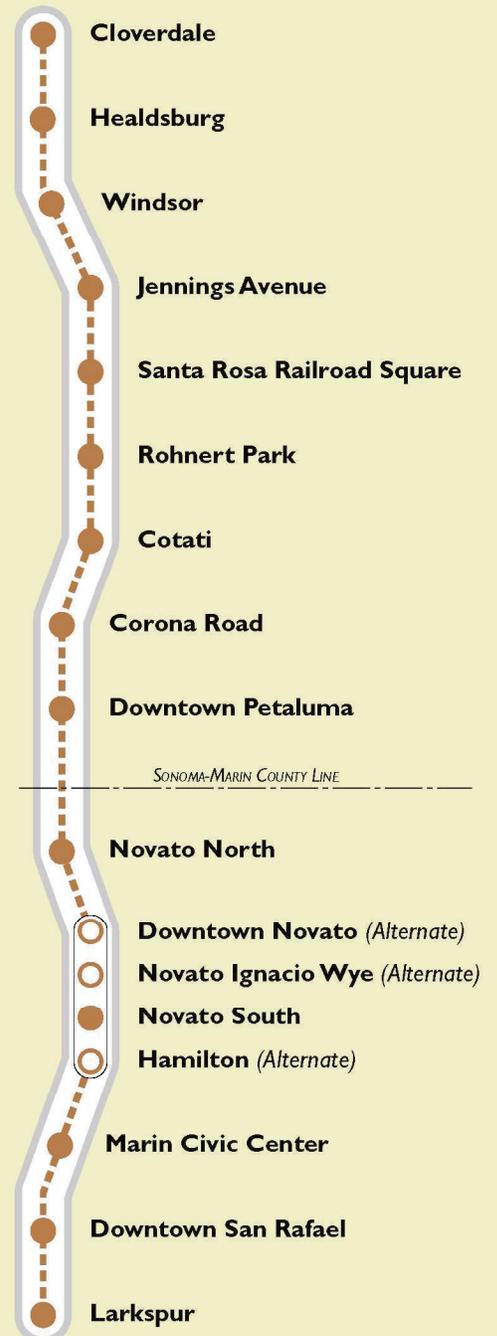
# Sonoma-Marín Area Rail Transit Project

SCH #2002112033

## Final Supplemental Environmental Impact Report



July 2008



# **Sonoma-Marin Area Rail Transit Project**

## **Final Supplemental Environmental Impact Report**

**SCH #2002112033**



**July 2008**



**Directors**

**Charles McGlashan, Chair**  
Marin County

**Debora Fudge, Vice-Chair**  
Town of Windsor

**Al Boro**  
San Rafael

**Peter Breen**  
San Anselmo

**Hal Brown**  
Marin County

**Valerie Brown**  
Sonoma County

**Carole Dillon-Knutson**  
Novato

**Jim Eddie**  
GGBHTD

**Robert Jehn**  
Cloverdale

**Mike Kerns**  
Sonoma County

**Jake Mackenzie**  
Rohnert Park

**Barbara Pahre**  
GGBHTD

July 1, 2008

To All Interested Parties:

Please find attached the Final Supplemental Environmental Impact Report (FSEIR) for the Sonoma-Marín Area Rail Transit (SMART) Project (SCH 2002112033). This report, which supplements SMART's 2006 Final EIR, incorporates comments received on the Draft SEIR and responses to those comments. The Draft and Final SEIR analyze the project components that have changed or been added since certification of the 2006 Final EIR, including:

1. Potential addition of weekend passenger rail service.
2. Potential use of light Diesel Multiple Unit (DMU) rail vehicles instead of heavy DMUs.
3. Potential alternative locations for the Novato South station in addition to the site analyzed in the SMART 2006 Final EIR.
4. Modified cumulative impacts scenario, due to a change in the level of projected future freight rail service on the SMART corridor compared to the level of freight service that was projected and evaluated in the SMART 2006 Final EIR.

The FSEIR will be considered by the SMART District Board of Directors in deciding whether to approve the project, adopt a sales tax ordinance to fund the project, and adopt an expenditure plan for the expenditure of the proceeds of the tax. If adopted by the Board, the sales tax measure will be placed on the ballot for the November 4, 2008, election.

**A Public Hearing on the FSEIR and the sales tax ordinance and expenditure plan is scheduled for:**

**July 16, 2008, at 1:30 PM  
San Rafael City Council Chambers; City Hall  
1400 Fifth St., San Rafael, CA**

**SMART Staff**

**Lillian Hames**  
General Manager

**Chris Coursey**  
Community Outreach Manager

**Lucrecia Milla**  
Property Manager

**John Nemeth**  
Rail Planning Manager

**Nina West**  
Office Manager

To conserve resources, this FSEIR is being distributed primarily on computer disk. Copies of the FSEIR are available as of July 3, 2008, on the SMART Project website at [www.sonomamarintrain.org](http://www.sonomamarintrain.org) or by contacting Nina West at 415-226-0880. Copies of the FSEIR may also be reviewed at the following locations:

Sonoma-Marín Area Rail Transit  
750 Lindaro St. #200  
San Rafael, CA 94901

MTC Library  
101 8<sup>th</sup> Street  
Oakland, CA 94605

Civic Center Library  
3501 Civic Center Drive, Rm. #414  
San Rafael, CA 94903

Santa Rosa Central Library  
211 E. Street  
Santa Rosa, CA 95404

750 Lindaro Street, Suite 200  
San Rafael, CA 94901  
415-226-0880  
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# 1. Introduction

## 1.1 PURPOSE

This Final Supplemental Environmental Impact Report (FSEIR) is prepared for the consideration of the proposed Sonoma-Marín Area Rail Transit (SMART) passenger rail project. The FSEIR consists of the Draft SEIR, comments on the Draft SEIR, responses to those comments, and revisions to the Draft SEIR. As stated in the DSEIR, the SEIR analyzes the potential environmental impacts of specific changed project components associated with the proposed SMART project and changes in circumstances affecting the project, which have been identified since certification of the 2006 FEIR.

The proposed SMART project studied in the 2006 FEIR includes passenger rail service along approximately 70 miles of the existing Northwestern Pacific (“NWP”) rail corridor from Cloverdale in Sonoma County to Larkspur in Marin County, with 14 rail stations, several passing sidings, a rail maintenance facility and shuttle service at select locations. The proposed project also includes the implementation of a bicycle/pedestrian pathway generally within or adjacent to the rail corridor. The proposed bicycle/pedestrian pathway includes a combination of Class I and Class II facilities. Implementation of the project would occur generally within the existing railroad right-of-way. Major funding for the proposed project would come from the proceeds of a 1/4-cent sales tax measure, if approved by two-thirds of the voters of the District in a district-wide election.

## Supplemental Project Description

Project components and conditions that have changed since certification of the SMART FEIR in July 2006 and which are analyzed in this SEIR, in conformance with the requirements of CEQA, include the following:

- Analysis of the changes in environmental impacts associated with addition of weekend service to the overall SMART passenger rail project;
- Analysis of the changes in environmental impacts associated with using an alternative vehicle, the light Diesel Multiple Unit (DMU), for passenger rail service rather than the heavy DMU, which was analyzed in the 2005 DEIR and 2006 FEIR;
- Analysis of environmental impacts associated with three additional alternative sites for the Novato South rail station; and
- Update of the cumulative analysis in SMART’s 2005 DEIR and 2006 FEIR in relation to potential changes in future NCRA freight service.

The scope of the SEIR is limited to these four analyses.

## CEQA Compliance

This FSEIR has been prepared by the SMART District pursuant to the California Environmental Quality Act (CEQA) (Section 21000 et seq., California Public Resources Code), in accordance with the *Guidelines for the Implementation of the California Environmental Quality Act* (Section 15000 et seq., California Code of Regulations, Tit. 14). The purpose of an SEIR is to provide the additional information necessary to make the previous FEIR adequately apply to the project as revised. Accordingly, the SEIR need contain only the information necessary to respond to the project changes, changed circumstances, or new information that triggered the need for additional environmental review (CEQA Guidelines, Section 15163).

This FSEIR amends and incorporates by reference the Draft SEIR, which is available as a separately bound document from the SMART District. The primary purpose of this FSEIR is to clarify and refine the environmental analysis and mitigation measures in the Draft SEIR in response to written and oral comments and recommendations received during the public review period. The review period of the Draft SEIR (State Clearinghouse No. 2002112033) was from March 7 to April 24, 2008. A list of the individuals, agencies, and organizations that commented on the Draft SEIR and copies of the written and oral comments are included in Section 2 of this document.

Information provided in the responses to comments clarifies and amplifies the analysis presented in the Draft SEIR. However, no significant new information was added that would trigger recirculation of the Draft SEIR under CEQA. The Draft SEIR represented a good faith effort to disclose all impacts and identify all feasible mitigation measures associated with the supplemental project components and changed circumstances, and provided the public with a meaningful opportunity to review and comment on the potential environmental impacts of these components. There were no new significant environmental impacts, or a substantial increase in the severity of any impact, identified in the comments or responses that were not already identified in the Draft SEIR or in the previous 2006 certified FEIR. Therefore, public review and comment of the FSEIR is not required under CEQA. However, this FSEIR was delivered to commenting agencies and made available to the public at least 10 days in advance of the SMART Board hearing on the FSEIR.

It should be noted that CEQA does not require a Lead Agency to conduct every test or perform all research, study, or experimentation recommended or demanded by commenters. Rather, a Lead Agency need only respond to significant environmental issues and does not need to provide all information requested in the comments, as long as a good faith effort at full disclosure is made in the SEIR (CEQA Guidelines Sections 15088 and 15204). This FSEIR presents full disclosure of all significant environmental issues.

This FSEIR will be used by the SMART District as part of its project approval process. The mitigation monitoring plan presented in the 2006 FEIR will be used for the project and any new mitigation measures identified in the DSEIR will be added to the plan prior to adoption by the SMART Board.

## **Document Availability**

Copies of the FSEIR have been mailed to agencies that commented on the Draft SEIR and other parties who requested the FSEIR. The FSEIR is also available at the SMART District offices located at 750 Lindaro Street, #200, San Rafael, CA; at the Metropolitan Transportation Commission Library located at the Joseph P. Bort MetroCenter, 101 8th Street, Oakland, CA; at the Civic Center Library, 3501 Civic Center Drive, Room #414, San Rafael, CA; and at the Santa Rosa Central Library, 211 E Street, Santa Rosa, CA. Both the Draft SEIR and FSEIR are available online at SMART's website, at [www.sonomamarintrain.org](http://www.sonomamarintrain.org).

## **1.2 ORGANIZATION OF FSEIR**

The FSEIR consists of the following elements:

- The Draft SEIR (bound separately, issued in March 2008),
- Section 1.3 - Summary of Draft SEIR public review process,
- Chapter 2 - A list of persons, organizations, and public agencies commenting on the Draft SEIR, comments and recommendations received on the Draft SEIR, master responses to common issues raised in the Draft SEIR comments, responses to significant environmental points raised in the comments, and responses to Draft SEIR hearing comments.
- Chapter 3 - Revisions to the Draft SEIR in strikeout and underline format, and
- Chapter 4 - References and Report Preparation.

## 1.3 SUMMARY OF DRAFT SEIR PUBLIC REVIEW PROCESS

The Draft SEIR review process provided the public with considerable opportunity to review the document and make comments. The DSEIR was released on March 7, 2008 and over 600 copies of the document were distributed to cities, federal state and local public agencies, elected officials, interested stakeholders and citizens. Public notices in newspapers in both Sonoma and Marin counties were issued, providing information on the availability of the document and hearing dates and locations.

Copies of the DSEIR were also made available to the public for review at four locations: The Civic Center Library in San Rafael, the Santa Rosa Main Library in Santa Rosa, the Metropolitan Transportation Commission (MTC) Library in Oakland, and the SMART Office in San Rafael. Additionally, SMART made information about the DSEIR review process and the text of the DSEIR available on its website ([www.sonomamarintrain.org](http://www.sonomamarintrain.org)).

The public review period lasted 48 calendar days, and closed on April 24, 2008. SMART accepted comments both in writing and via email. SMART also held two public meetings on the adequacy of the DSEIR, one in Novato in Marin County on April 9, 2008 and one in Santa Rosa in Sonoma County on April 16, 2008. Verbal comments made at these meetings were accepted by SMART as official DSEIR comments. In addition, SMART staff conducted outreach efforts with presentations on the DSEIR to the following organizations:

- Novato Leadership Forum on March 31, 2008,
- Transportation Authority of Marin SMART Working Group on April 25, 2008,
- North Bay Leadership Council on April 25, 2008 and
- Hamilton Community Forum on May 14, 2008.

Also, during the DSEIR review period, SMART staff made approximately 20 public presentations about the SMART project that included discussion of elements in the DSEIR.

## 1.4 DECISION-MAKING PROCESS

The SMART District is the CEQA lead agency for this FSEIR. In 2006, SMART approved an Expenditure Plan outlining how the proceeds of a 1/4-cent sales tax measure would be spent to implement the proposed project, and adopted an ordinance to place the sales tax measure on the ballot in the November 2006 general election. SMART will use the FSEIR in its decision-making processes to help determine whether to approve a revised Expenditure Plan and place a sales tax measure on the ballot in Marin and Sonoma Counties in November 2008.

### SMART Certification of the FSEIR

Prior to taking action on the proposed project, SMART must certify the FSEIR. SMART must certify that:

- The FSEIR has been completed in compliance with the CEQA;
- The SMART Board reviewed and considered the information contained in the FSEIR prior to considering the proposed Project; and
- The FSEIR reflects the independent judgment and analysis of the SMART Board (State CEQA Guidelines Section 15090).

In conjunction with certification of the FSEIR, SMART must prepare one or more written findings of fact for each significant environmental impact identified in the document. These findings must either state that:

- The Project has been changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact;
- Changes to the Project are within another agency's jurisdiction and have been or should be adopted; or
- Specific considerations make mitigation measures or alternatives infeasible.

If any of the impacts identified in the SEIR cannot be reduced to a level that is less than significant, SMART may issue a Statement of Overriding Considerations for approval of the project if specific social, economic, or other factors justify the project's unavoidable adverse environmental effects. If SMART decides to approve the project for which the FSEIR has been prepared, SMART will issue a Notice of Determination.

### **Other Agency Actions**

Information in the FSEIR, the 2006 certified FEIR and supporting technical studies will aid responsible and trustee agencies in their permitting processes for the proposed project.

Subsequent to certification of the FSEIR, the SMART District will prepare the necessary environmental documentation to comply with the National Environmental Policy Act (NEPA). This document will be circulated among federal agencies and will support federal review and permitting of the project.

## 2. Comments and Responses on the Draft SEIR

This section addresses all comments received on the Draft SEIR, both written and oral. A total of 46 comment letters/emails were received during the public comment period, from March 7, 2008 through April 24, 2008. Although several written comments were received late, they are responded to in this Final SEIR. A total of 26 people presented oral comments at the two public meetings held in Marin County on April 9, 2008 and in Sonoma County on April 16, 2008.

Responses to each comment are provided in the following sections. In some cases, the responses are supported by changes to the DEIR text. These text revisions are included in Chapter 3 of this document. Please note that numerous comments requested minor corrections. Since the DSEIR is not being reissued in its entirety, these minor edits and corrections have not been incorporated into the text revisions. However, all comments are noted and are part of the public record.

The SEIR preparers have made every effort to fully address each substantive comment on the DSEIR. Master Responses are provided first in Section 2.1, followed by individual responses to each comment in every comment letter in Section 2.2. Hearing comments and responses are at the end of Section 2.2.

All documents incorporated herein by reference are available for review at the SMART District office, located at 750 Lindero Street, Suite 200, San Rafael, California 94901.

### 2.1 MASTER RESPONSES

Numerous comments raised common concerns or questions that are most appropriately answered or clarified in one comprehensive or “master” response. For this Final SEIR, the issues listed in Table 2-1 are addressed in master responses, numbered 1 through 5. Many of the individual responses refer back to these master responses.

**Table 2-1. Master Response List**

Master Response	Title	Issues Addressed	Page
1	Scope of Supplemental Environmental Review	<ul style="list-style-type: none"> <li>• Purpose and Scope of SEIR</li> <li>• Comments on previous 2006 FEIR</li> </ul>	2-2
2	Scope of Cumulative Analysis of Freight Rail Service	<ul style="list-style-type: none"> <li>• Cumulative scenarios</li> <li>• Speculation</li> <li>• Segmentation</li> <li>• Differentiation between freight and SMART project</li> </ul>	2-2
3	Novato South Station Ridership Projections	<ul style="list-style-type: none"> <li>• Clarification of methodology</li> </ul>	2-4
4	Hamilton Station Traffic Issues	<ul style="list-style-type: none"> <li>• Clarification of vehicle trips to station</li> </ul>	2-5
5	Quiet Zone Implementation	<ul style="list-style-type: none"> <li>• Process and Requirements</li> <li>• Funding and Implementation</li> </ul>	2-6

## **Master Response 1 – Scope of Supplemental Environmental Review**

A few comments raise questions and concerns about the adequacy of the analysis in the *prior* EIR prepared for the original SMART project submitted to the voters in 2006 (the 2005 DEIR and 2006 FEIR). As explained below, these questions and concerns are outside the scope of this supplemental environmental analysis.

The EIR for the original project was certified in July 2006 and the time in which to challenge the EIR has passed. As a result, the 2006 FEIR, which includes the 2005 DEIR, is conclusively presumed to be valid and its adequacy is no longer at issue (Pub. Res. Code, §21167.2). As noted by a leading CEQA commentator:

*Once an EIR has been certified for a project, under Pub Res C §21167.2 the EIR must be conclusively presumed valid unless a lawsuit to challenge it is timely filed . . . . As a result of this conclusive presumption of validity, when the statute of limitations for challenging an EIR has run, the overall adequacy of the EIR is irrelevant. The only question that may be considered by an agency before a further discretionary approval for the project is whether one of the three exceptions triggering the need for a subsequent or supplemental EIR exists.*

(Kostka & Zischke, Practice Under the California Environmental Quality Act (2d ed., CEB, §19.2; see also §19.54).)

As explained in Section A.1.1 of the DSEIR, subsequent or supplemental environmental review may only be required if there are substantial changes to the project, changes in project circumstances, or new information that would involve new or substantially more severe significant impacts. (Pub. Res. Code, §21166.) In the case of the SMART project, the project changes analyzed in the DSEIR are the addition of weekend service, use of light Diesel Multiple Units (DMUs), and alternatives to the Novato South Station site, and the change in circumstances is a revised freight cumulative impact scenario based on NCRA’s 2007 Notice of Preparation (NOP) and Initial Study for its proposed Russian River Division Freight Rail Project (see Master Response 2).

Preparation of a supplemental EIR does not “re-open” the prior certified EIR, but supplements it to the extent necessary to adequately address project changes and changed circumstances. The focus of the analysis in SMART’s DSEIR, as in any supplemental EIR, is whether these changes result in new or substantially more severe significant impacts than identified in the prior EIR. Consistent with the requirements of CEQA, the DSEIR considers only the incremental differences between the original project and the proposed changes; the project as reviewed in the prior EIR is effectively treated as part of the baseline. (See Kostka & Zischke, §19.54.) The SEIR contains only the information necessary to address these changes (see CEQA Guidelines, §15163(b)). Comments that focus on the adequacy of the prior certified EIR or request additional information regarding the original proposed project are thus outside the scope of the DSEIR and are not further addressed in these responses.

## **Master Response 2 – Scope of Cumulative Analysis of Freight Rail Service**

Several comments request that SMART go beyond the cumulative analysis presented in the Draft SEIR and fully analyze all the environmental consequences of freight rail operations along the entire NWP rail corridor, including the rail line north of Cloverdale. This is not required by CEQA.

SMART’s project is the implementation of passenger rail service and an ancillary bicycle/pedestrian pathway in the NWP corridor from Larkspur to Cloverdale. As explained in the DSEIR, the resumption of freight rail service on the NWP is a separate project proposed by a separate and independent governmental agency, NCRA. SMART and NCRA were created by the Legislature under separate statutory schemes to

fulfill separate and distinct functions. SMART's passenger rail project and NCRA's freight rail project are separately funded and are not interdependent; each will or will not move forward independently of the other project. Each project requires its own environmental analysis under CEQA to address its project-specific impacts as well as the cumulative impacts of both types of rail service *to the extent the impacts of each are cumulative with the other*. Consistent with CEQA, only the potential cumulative impacts of NCRA's proposed freight operations are analyzed in the SMART SEIR, and only to the extent there is new information since the certification of SMART's FEIR in 2006 that indicates those operations could result in new or more severe significant impacts than previously analyzed.

Contrary to some comments, focusing the Draft SEIR's analysis on the project-level impacts of the SMART project and the reasonably foreseeable cumulative impacts of passenger and freight operations on the shared corridor is neither "segmentation" nor "piecemealing" under CEQA. "Segmentation" and "piecemealing" refer to the avoidance of environmental review by chopping a larger project into smaller components or phases and studying them separately, in a way that understates the actual environmental impacts of the whole project. Instead, CEQA requires that environmental review address the "whole of the action" including reasonably foreseeable future phases of the proposed project. In addition, the environmental review should consider other projects that may have related cumulative impacts, although in less detail than a project-level analysis (CEQA Guidelines, §§15130, 15378). This was the approach taken both in SMART's certified FEIR and in this SEIR.

The "whole" of SMART's project is the institution of passenger rail service and an ancillary bicycle/pedestrian pathway between Larkspur and Cloverdale. NCRA's resumption of freight service between Lombard and Willits is a separate project that will have some related impacts cumulative with SMART's impacts, but only on the portion of the rail line where both will operate. Thus, the geographic scope of potential cumulative impacts is the rail corridor between Cloverdale at the north end and the Ignacio Wye in Novato at the south end. No passenger operations are proposed north of Cloverdale and no freight operations will occur south of Highway 37 in Novato. Potential impacts associated with freight trains operating on rail segments not shared with SMART passenger service would not be cumulative effects of the SMART project. For example, since SMART's proposed project would not extend north of Cloverdale, it would not have potential impacts north of Cloverdale. Any impacts that could occur there as a result of future freight rail service would not be cumulative with passenger rail impacts.

Consistent with CEQA, the DSEIR's discussion of cumulative impacts is "guided by standards of practicality and reasonableness." (CEQA Guidelines, § 15130(b).) In analyzing potential cumulative impacts that could occur within the rail corridor where both SMART and NCRA would operate, the DSEIR properly focuses on whether there is a significant combined impact, and not on the attributes of the freight project (e.g., impacts that could be associated with specific types of freight) that do not contribute to a cumulative impact with SMART's project. As required by CEQA, the DSEIR's cumulative analysis is based on available information, including the information in NCRA's 2007 NOP and Initial Study, subsequent clarifications from NCRA, and independent analysis. Consistent with prudent CEQA practice, SMART's SEIR technical consultants consulted with NCRA's EIR technical consultants in preparing the DSEIR to ensure that accurate and consistent technical details (e.g., train speeds, locomotive specifications) were used in the cumulative analyses.

SMART, as the lead agency for the proposed passenger rail project, is required by CEQA to mitigate only its incremental contribution to a significant cumulative impact, not the entire cumulative impact. (CEQA Guidelines, Section 15130(b)(5).) NCRA, not SMART, is responsible for mitigating the impacts of freight operations. Nevertheless, some mitigation and environmental compliance measures proposed by SMART (e.g., Quiet Zones and continuous welded track) would mitigate some of the impacts of freight trains as well as passenger trains, such as noise from train horns and train pass-bys.

As described in Section B.3 of the DSEIR, the determination of the level of freight operations that should be included in the cumulative analysis for SMART's DSEIR was based on both the project description in NCRA's Initial Study for its Russian River Division Freight Rail Project and on SMART's independent analysis of various NCRA long-range planning documents. As a result of this independent analysis, SMART's environmental team concluded that the levels of freight service described in Speculative Scenarios 1 and 2 are highly speculative and thus are not "reasonably foreseeable" for purposes of a cumulative analysis. As discussed in the DSEIR, this conclusion is based not only on the substantial economic development that would have to occur in the North Coast region before this level of rail freight service would be justified,<sup>1</sup> but also on the extensive environmental, permitting, financial, and operational hurdles<sup>2</sup> that would have to be overcome before such service could be implemented. Both scenarios would require extending service into the Eel River Canyon, which many believe is neither environmentally nor technically feasible and which would require a massive funding commitment that has not been identified. Although various proposals have been made and are still being explored regarding funding and implementing freight service as far north as Humboldt Bay, these proposals do not represent "reasonably foreseeable probable future projects" within the meaning of a CEQA cumulative analysis. Nevertheless, the DSEIR goes beyond the requirements of CEQA and describes the environmental impacts that might occur with these higher levels of service; further analysis of unrealistic projections or operations that face potentially insurmountable environmental, economic, and funding hurdles is not required or justified.

In summary, the DSEIR appropriately provides a "worst case" analysis of the cumulative impacts that are likely to occur within the SMART corridor. There is nothing in CEQA, the CEQA Guidelines, or California case law that requires SMART, as the lead agency for a specific passenger rail proposal between Cloverdale and Larkspur, to undertake the type of full environmental review of the entire rail corridor requested in some comments. Nor is there any requirement that SMART analyze all the potential impacts of NCRA's separate freight rail project, particularly with respect to impacts to which the SMART project would not contribute. Neither SMART nor NCRA is required by CEQA to analyze the whole of the other agency's separate project, or to evaluate speculative impacts beyond the scope of either proposed project. The public and decisionmakers will have the opportunity to evaluate and comment on the project-specific details of NCRA's proposed freight service when NCRA releases its EIR for public review.

### **Master Response 3 – Novato South Station Ridership Projections**

The ridership projections for the Novato South Station alternatives were developed to assess the environmental impacts of the alternative sites and help decisionmakers determine which station site would be most effective. The results should be thought of as a ranking of the project sites by ridership for planning and environmental purposes, rather than an exact forecast. Ridership is not the only consideration that will be used to select the preferred station site. A manual method was used to make the ridership forecasts (described below), because the computerized MTC regional travel forecasting model is not suited for the task of

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<sup>1</sup> See, e.g., Parsons Brinckerhoff, *Long Term Financial and Economic Feasibility of the Northwestern Pacific Railroad* (January 2003), noting the low growth and economic decline in the northern end of the NWP corridor, and concluding that freight operations could realize a positive cash flow only with the most optimistic projections regarding market development along the entire corridor (pp. S-13, S-15). See also documents cited on page B-22 of the DSEIR.

<sup>2</sup> See, e.g., a 1998 report by URS Greiner Woodward Clyde for the Federal Emergency Management Agency (FEMA), entitled *Geologic and Geotechnical Report, North Coast Railroad, Northern California*, noted the high risk of landsliding in the northern end of the rail corridor and estimated the cost of mitigating this hazard would be (in 1998 dollars) roughly \$642 million (p. 5-1). Approximately 89% of the \$642,000,000, or about \$520,000,000, would be needed for the portion of the rail line between Willits and Arcata. The cost estimate for the most unstable portion of the rail line in the Eel River Canyon (identified as the Island Mountain Block, MP 184.4 to MP 195.8) was \$10 million per mile (1998 dollars). See also footnote 1.

examining alternative station locations in a relatively small area (which is the task required in comparing alternative station sites in the same geographic area). The MTC model’s travel analysis zones are too large for this purpose, and would not be sensitive to moving a station just a mile or two within these zones.

The methodology began with the Census population noted in the text within a half-mile of the station, as determined by GIS techniques. A mode choice factor derived from the MTC model was then applied, which is that approximately 3.5% of the employed residents within that area would find SMART the preferred alternative for their commute trip. Because population has increased significantly around the Hamilton site since April 2000 (when the Census was conducted), information on housing constructed, under construction, approved, and proposed was requested from the City of Novato in October 2007, and the Hamilton area population estimate was updated using the average household size in Novato.<sup>3</sup> Factors were then applied to “grow” this to 2025 levels. Thus, the ridership projections presented in the DSEIR reflect more current population and housing information than the Census data.

The reason that ridership is significantly higher at the Hamilton site compared to the Roblar Drive site (originally considered in the 2005 DEIR and 2006 FEIR) and other two alternative sites (Downtown Novato and Ignacio Wye) is simply that there is more ridership-generating potential, particularly for people who commute to jobs in the Hamilton area, where the job density is higher. In fact, it is estimated that over the course of a day, approximately half of the Hamilton Station’s ridership would come from residents in the local area, and half would come from commuters living elsewhere, but who work in the Hamilton area.

The existing Hamilton Shuttle is acknowledged in the DSEIR and this shuttle was factored into the analysis.

## **Master Response 4 – Hamilton Station Traffic Issues**

Several comments requested additional clarification of the traffic impacts at the Hamilton Station site. There are three site configuration options, as described in DSEIR Section 2.3.3.

In the AM (morning) peak hour—which would probably occur between 6:30 and 7:30 AM—there would be 35 inbound and 12 outbound vehicles during the peak morning hour, regardless of the access option chosen (A – Main Gate Road access only, B – Both Main Gate Road and Hamilton Parkway access, or C – Hamilton Parkway access only). Most of the outbound vehicles would be drivers dropping off passengers, known as “kiss’n’ride”. This would be approximately a 4 to 5 percent increase in peak hour traffic on the adjacent street compared to the “No Project” scenario, regardless of which access option is chosen. With the SMART project, some of the existing trips that would continue to Highway 101 are “intercepted” by the station, compared to the No Project alternative where there is no station and drivers must continue to Highway 101. Because most of these trips would probably occur early in the morning (before 7:30 AM) or after 5:00 PM, the peak vehicle activity would not occur at the same time as school drop-off and pick-up. In other site plan options, the station vehicle traffic would be split between Main Gate Road and Hamilton Parkway, or confined to Hamilton Parkway.

A crosswalk would be installed across the entrance to the station on Main Gate Road, if the City of Novato concurs. If the option is selected that provides access from Main Gate Road, SMART would explore providing an adult crossing guard, if warranted.

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<sup>3</sup> Fax from Hans Grunt, City Planner, City of Novato, to Debbie Chan, senior planner, Dowling Associates, on October 18, 2007.

## **Master Response 5 – Quiet Zone Implementation**

Quiet Zones were identified in SMART’s 2005 DEIR as an environmental compliance measure to address train horn noise at grade crossings (DEIR, pp. 2-69, 3-138). SMART provided additional information about quiet zone implementation in its 2006 FEIR in Master Response Q on page 3.2-44. The following Master Response is intended to provide the most current information on quiet zone implementation with additional details.<sup>4</sup>

### **The Train Horn Rule**

Historically, states required both passenger and freight trains to sound their horns at grade crossings. Some states, however, allowed local jurisdictions to enact “whistle bans”. These bans often did not require any specific safety evaluations or improvements. According to a nationwide study commissioned by the Federal Railroad Administration (FRA) in 1995, the crossings quieted by whistle bans with no added safety improvements posed greater safety risks than crossings with whistles or horns.

In June 2005, the FRA pre-empted state rules regarding train horns with its “Final Rule on Use of Locomotive Horns at Highway-Rail Grade Crossings”. Horns were required by the federal government to sound, and states could no longer allow local jurisdictions to ban horns. However, the new rule provided a mechanism for all local jurisdictions to create quiet zones based on risk-reduction criteria.

### **Growth of Quiet Zones**

Currently, there are 308 quiet zones nationwide according to the FRA. This translates into approximately 3,300 quieted grade crossings. About 1/3 of those quiet zones have been established in the last three years (many “pre-rule” quiet zones were grandfathered in). There are at least 123 more quiet zones in the application process, representing hundreds and maybe thousands more crossings. Since the FRA only receives Notices of Intent from state agencies as a courtesy, there could be many more quiet zones on the way.

### **Quiet Zones Defined**

The establishment of a quiet zone allows trains not to sound their horns at crossings, although horns may still be sounded on occasion if a train operator perceives a serious safety hazard.

A “quiet zone” can include one single crossing, or it can include dozens of crossings. The Utah Transit Authority for example, which runs a new commuter rail service called the “FrontRunner” from Salt Lake City to Ogden, aided in the establishment of *one* single quiet zone for the length of their 38-mile corridor, which includes 14 jurisdictions and 41 crossings. The only size requirement is that quiet zones be at least ½ mile long.

Only a local public authority, the entity that has jurisdiction over the local street network, can officially establish quiet zones. Consequently, while SMART can make suggestions, it cannot “designate” certain intersections as being part of a future quiet zone.

Local jurisdictions can work together to create longer quiet zones, and to simplify the quiet zone implementation process. In the Utah example, the town of Woods Cross took the lead in officially establishing the quiet zone, working with over a dozen other local jurisdictions in the process.

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<sup>4</sup> Information in this master response is based largely on *Quiet Zones – In Depth Workshop*, presented by Ron Ries, Staff Director, Highway Rail Crossing and Trespasser Programs, Office of Safety, FRA, Ventura, CA, May 14, 2008.

As noted in its 2005 DEIR and 2006 FEIR, SMART will work with local jurisdictions to help implement quiet zones where desired, through technical assistance, coordination, and funding programmed in SMART's capital budget for improvements at crossings.

### Establishing Quiet Zones with SSMs

Grade crossings can be automatically included in a quiet zone when either one of two Supplemental Safety Measures (SSM) are present: curb medians or quad gates. Both are designed to prevent cars from driving around lowered gates at crossings, one of the most common causes of grade crossing incidents.



Mountable curb median

Curb medians physically prevent motorists from driving in the opposite lane to go around a lowered gate. Quad gates involve four separate gates or arms going down at a crossing rather than the traditional two, again to prevent motorists from driving around lowered gates to cross the tracks when a train is approaching.

Curb medians can include simple, mountable curbs with delineator panels, which generally cost \$10,000 to \$15,000 per intersection. A more permanent non-mountable curb median can be installed for about \$60,000 to \$80,000 per intersection. These can be made of concrete, brick, or other materials.

Curbs are recommended to extend 100 feet in each direction from the gates at the rail crossing. However, the required distance can be as short as 60 feet if a public street, commercial driveway, or residential driveway (to four or more housing units) is present in the area between 60 and 100 feet from the crossing. If one of these types of street/driveways is located less than 60 feet from the gate, then curb medians are not an option.



Curb median

There are numerous crossings in the SMART corridor where curb medians are possible, given the absence of major street/driveways within 60 feet of the crossing. And, there are several crossings where curb medians are already present.



4 Quad Gate

Four-quadrant gates are a solution where streets or driveways are located relatively close to the tracks. All gates incorporated into quiet zones are required by the FRA to have modern signal features like power-out indicators and constant warning time, a feature that detects train speed in order for gates to be lowered for a consistent length of time before trains enter the intersection.

As part of its capital plan and budget, SMART will be installing crossing gates that include the modern signal features mentioned above. These grade crossing improvements are estimated to have an approximate average cost of \$250,000

per crossing, as reflected in SMART's financial plan. Based on early rough estimates, SMART conservatively assumed that the average incremental cost of upgrading from two to four gates would be \$150,000. In practice, however, recent quad gate installations and quad gate estimates for potential future installations have been less expensive. Based on information in SMART's 2008 "Grade Crossing Estimate Summary," the average incremental cost of installing quad gates should be approximately \$108,000.

Some communities have spent more than the aforementioned amounts per crossing on projects that include the installation of four quadrant gates. However, these costs often include other infrastructure improvements beyond the quiet zone SSMs. Moreover, some of these projects involve circumstances that differ from SMART's project, including: construction occurring while heavy rail traffic continues to operate, work on corridors with multiple tracks which adds to cost and complexity, and work on a single crossing, which limits opportunities for economies of scale.

With both of the supplemental safety measures, curb medians and quad gates, a significant amount of money can be saved if these elements are incorporated into the overall construction plan, rather than added at a later date. For this reason, the 2006 FEIR recommended that quiet zone safety measures be incorporated into SMART's final design plans.

### **Establishing Quiet Zones with ASMs**

An alternative to the use of supplemental safety measures at grade crossing is the use of Alternative Safety Measures (ASMs). These include photo enforcement technology, public awareness campaigns, or SSMs that deviate from the general FRA requirements. These may include, for example, curb medians that are shorter than the 60 feet required. If ASMs are the only safety measures being pursued, then the local jurisdiction must acquire FRA approval. The use of ASMs does not automatically bring crossings into a proposed quiet zone, as SSMs do.

### **Establishing Quiet Zones with Risk-Based Exceptions**

Quiet zones can be established without any special treatments at grade crossing if the safety risk in a quiet zone when the train does not blow its horn is below one of two thresholds. It need not be below both thresholds.

Using a calculator provided by the FRA and available online, each crossing can be assigned a risk score. The average of these scores for all the crossings in a proposed quiet zone is known as the Quiet Zone Risk Index (QZRI).

If the QZRI is equal to or lower than the National Significant Risk Threshold (NSRT), then no further supplemental safety measures are required anywhere in the zone. The NSRT is the national average risk level that would be expected at a crossing if a train was blowing its horn. Currently, the NSRT is 19,047, although the figure is updated annually.

Likewise, if the QZRI is equal to or below the Risk Index with Horns (RIWH), then no further supplemental safety measures are required anywhere in the zone. The RIWH is the average risk level for a particular quiet zone that would exist if a train was blowing its horn.

Creating a quiet zone with no new improvements, based on a risk analysis, requires that crossings have gates and flashers and at least one crossing in the quiet zone has existing qualifying supplemental safety measures. If the QZRI is not below the NSRT or RIWH, then a QZ may still be established if implementation of SSMs at one or more crossings will bring the QZRI below the NSRT or RIWH.

About 1 in 5 new quiet zones established since the 2005 FRA train horn rule were established with no new improvements at any crossings. About 1 in 3 of the new quiet zones involved the addition of supplemental safety measures at some crossings but not at others. The chart at right shows how it's possible to establish a quiet zone, with improvements at only selected crossings. In this example, each crossing has a risk score. The average score for the proposed quiet zone, or the QZRI, of 20,850 exceeds the NSRT, so this quiet zone cannot be established without making some improvements. In the first example here, if crossing #4 is treated with a supplemental safety measure, however, all four crossings can be brought into the quiet zone with no additional improvements.

Crossing	QZRI	NSRT
#1	20,016	
#2	16,680	
#3	13,344	
#4	33,360	
Avg.	20,850	19,047

SSMs automatically reduce the QZRI score by 75%, so the previous score of 33,360 would be reduced to 8,340. This would bring the average of the four crossing to a number below the NSRT, allowing a quiet zone that included all four crossings, with no additional treatments, as shown in the table at right.

Crossing	Risk Index	NSRT
#1	20,016	
#2	16,680	
#3	13,344	
#4	8,340	
Avg.	16,028	19,047

If SSMs are done at every crossing in the proposed quiet zone, then there is no need for a public authority establishing the quiet zone to go through these calculation exercises.

### Special Types of Crossings

In some other cases, no improvements need to be made to a crossing to include it in the proposed quiet zone. One way streets, for example, need no supplemental safety measures. In addition, private residential crossings need only a stop sign and rail crossing sign to be included in the quiet zone.

Treatments for private crossing that involve public access, industrial activity or commercial activities are determined on a case by case basis through a diagnostic review involving the PUC, applicable railroads (SMART and NCRA) and Caltrans. This also is the case for pedestrian & bike crossing safety measures. It is possible that safety measures already planned in the SMART project may suffice for these types of crossings.

### The Quiet Zone Process

The establishment of a quiet zone does not require the submission of an application to the FRA and thus there is no need for a local jurisdiction to wait to see if its quiet zone has been "accepted". Rather, the process begins when a local jurisdiction files a Notice of Intent to establish a quiet zone with the California Public Utilities Commission (PUC), Caltrans, and applicable railroads (in this case SMART and the NCRA).

This notice should describe the length of the quiet zone, which crossings are to be included, and the supplemental safety measures proposed. The document need not be so detailed as to include construction drawings. The aforementioned agencies have 60 days to comment on the Notice of Intent. They do not have the authority to arbitrarily "veto" the quiet zone, so long as the jurisdiction is complying with federal rules.

The issuance of this notice is typically preceded by a formal diagnostic review of crossings in the proposed quiet zone. The PUC, railroads (in this cast SMART and NCRA), and Caltrans must be invited to

the diagnostic review. This diagnostic review is necessary to determine treatments for pedestrian crossings and private crossings that involve public access, industrial activity or commercial activity. The review is also intended to assist the local public authority in devising the best plan for quiet zone implementation.

Once any necessary supplemental safety measures have been installed, and/or the PUC has verified Quiet Zone Calculator data, the local public authority issues a Notice of Establishment. This is sent to the FRA, all applicable railroads, Caltrans, any local governments affected, and any private property owners affected by private crossings. Railroads must cease blowing the train horns within 21 days. In the case of the SMART corridor, quiet zones could be established and improvements incorporated into SMART's construction plan prior to service start-up.

### **Funding for Quiet Zones**

SMART has allocated \$4.5 million in its current 2008 Financial Plan for quiet zone implementation. Based on SMART's estimates for the incremental cost of installing quad gates instead of standard gates as a supplemental safety measure, this amount should conservatively cover a minimum of 30 public crossings. More crossings would be covered if curb medians were used as a supplemental safety measure at some locations. Still more crossings would be covered if the Quiet Zone calculator can be used to show a corridor average risk lower than the National Significant Risk Threshold or the Risk Without Train Horns, eliminating the need for SSMs at certain locations.

### **Maintenance**

SMART will maintain all railroad equipment and signage within its right of way. Quad gates, for example, would be maintained by SMART, along with all other gates and signals. Curb medians that are outside of the SMART right-of-way would be maintained by the local jurisdiction.

## **2.2 COMMENTS AND RESPONSES**

Reproductions of the DSEIR comment letters, public comment hearing transcripts and detailed responses to both written and oral comments on the DSEIR are included in this section. Table 2-2 lists the comment letters and oral comments received on the DSEIR. The comment letters are grouped by category (agencies, organizations, individuals). Within each category, letters are listed/numbered in the order of date received. Individual comments within each letter are delineated and numbered consecutively. Each individual comment is marked in the right margin with the number of the response, for example, responses A1-1 and A1-2 address the first two points raised in Comment Letter A1. The page number in the table refers to the beginning of the comment letter.

Each comment letter is followed by a set of corresponding responses. Public hearing comments and responses are grouped by hearing date. Where an individual comment is addressed by information in one or more Master Responses, the response refers to the Master Response(s). Where an individual comment is addressed by a previous response, the reader is referred to that previous response to avoid repetition.

The reader should note that there were numerous suggestions for text amendments, clarifications and corrections, but since the entire document is not being re-issued, only substantive corrections and clarifications are provided. All DSEIR text changes are shown in Section 3 of this FSEIR.

**Table 2-2. Comments Received on the Draft SEIR by Category**

<b>Comment Set No.</b>	<b>Commenter</b>	<b>Date</b>	<b>Page</b>
<b>Agencies</b>			
A1	City of Novato	4/23/08	2-15
A2	State of California Department of Transportation	4/23/08	2-26
A3	North Coast Railroad Authority	4/24/08	2-29
A4	City of San Rafael	4/24/08	2-32
A5	Novato Unified School District	4/24/08	2-34
A6	City of Larkspur	4/25/08	2-39
<b>Organizations, Groups and Nonprofits</b>			
B1	Sierra Club Marin Group	4/9/08	2-50
B2	Marin Conservation League	4/16/08	2-70
B3	Marin Citizens for Effective Transportation	4/22/08	2-84
B4	Transportation Solutions Defense and Education Fund	4/23/08	2-101
B5	Sierra Club Sonoma Group	4/22/08	2-109
B6	Marin Audubon Society	4/23/08	2-118
B7	The Environmental Protection Information Center	4/24/08	2-123
B8	Greenbelt Alliance	4/24/08	2-130
B9	Marin County Bicycle Coalition	4/24/08	2-133
B10	Californians for Alternatives to Toxics	4/24/08	2-136
B11	Friends of SMART	4/24/08	2-142
<b>Individuals and Companies</b>			
C1	McCaughrin, Eric	4/2/08	2-146
C2	Hayward, Ann	4/2/08	2-149
C3	Morris, Paul	4/2/08	2-151
C4	Hoch, Marie	4/2/08	2-153
C5	Chitale, Gaurangi	4/3/08	2-155
C6	Tacy, Allen	4/3/08	2-157
C7	Behbehani, Mandy	4/9/08	2-163
C8	Mitchell, Glen	4/9/08	2-165
C9	Evans, Douglas and Heather	4/9/08	2-167
C10	Diamante, John	4/9/08	2-169
C11	Berson, Elvera	4/9/08	2-171
C12	Marshall, John	4/9/08	2-173
C13	Gillis, Ian	4/12/08	2-176
C14	Hartshorn, Diane	4/14/08	2-178
C15	Belichick, Robert L.	4/14/08	2-180
C16	Oliva, Mercita	4/15/08	2-182

**Table 2-2. Comments Received on the Draft SEIR by Category**

<b>Comment Set No.</b>	<b>Commenter</b>	<b>Date</b>	<b>Page</b>
C17	Knoesel, Ralf	4/15/08	2-184
C18	Cockerham, Patricia S.	4/15/08	2-186
C19	Brown, Robert and Nannette	4/17/08	2-195
C20	Stiles, Jerry; Lamberson, Daniel; Hoover, Shawn; Pizzimenti, Pamela; Brajkovich, Patricia; Carpenter, Zane R.; Carpenter, Gigi; Badgesten, Kerry; Badgesten, Stephen; Fildes, Cindy; Fildes, Craig; Scott, Craig;	4/19/08	2-212
C21	Tanner, Robert	4/20/08	2-216
C22	Swearengen, Ph.D., Jack C	4/20/08	2-219
C23	Platt, Kalvin	4/21/08	2-222
C24	Fields, Marla	4/22/08	2-227
C25	Longmaid, Chrit	4/22/08	2-236
C26	Gambill, Lionel	4/18/08	2-238
C27	Ristow, Susan	4/22/08	2-243
C28	Richards, Willard	4/23/08	2-248
C29	North Western Pacific Railroad Company	4/24/08	2-251
<b>Public Hearing Participants</b>			
D1	Ristow, Susan	4/9/08	2-260
D2	Nygren, Karen	4/9/08	2-261
D3	Lowe, Erica	4/9/08	2-261
D4	Schonbrunn, David	4/9/08	2-262
D5	Theran, Peter	4/9/08	2-263
D6	Peters, Jerry	4/9/08	2-263
D7	Adams, Geoff	4/9/08	2-264
D8	Diamante, John	4/9/08	2-264
D9	Gambill, Lionel	4/9/08	2-265
D10	Berson, Dr. Alan	4/9/08	2-265
D11	Butler, Debbie	4/9/08	2-266
D12	Stammler, Sharon	4/9/08	2-267
D13	Birdlebough, Steve	4/9/08	2-267
D14	Theran, Chrissy	4/9/08	2-268
D15	Clark, Candace	4/9/08	2-268
D16	Tacy, Allen	4/16/08	2-272
D17	Narath, Tanya	4/16/08	2-272
D18	Karchevski, Kaye	4/16/08	2-273
D19	Richards, Willard	4/16/08	2-273
D20	Swearengen, Jack	4/16/08	2-274
D21	Darley, Julian	4/16/08	2-275

**Table 2-2. Comments Received on the Draft SEIR by Category**

<b>Comment Set No.</b>	<b>Commenter</b>	<b>Date</b>	<b>Page</b>
D22	Schonbrunn, David	4/16/08	2-275
D23	Fields, Marla	4/16/08	2-276
D24	Strakosch, Walter	4/16/08	2-277
D25	Kortum, Bill	4/16/08	2-278
D26	Birdlebough, Steve	4/16/08	2-279

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Comment Set A1  
City of Novato



THE CITY OF  
**NOVATO**  
CALIFORNIA

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Mayor  
Pat Eklund  
Mayor Pro Tem  
Jim Leland  
Councilmembers  
Carole Dillon-Knutson  
Madeline Kellner  
Jeanne MacLeamy

City Manager  
Daniel E. Keen

April 23, 2008

Lillian Hames, General Manager  
Sonoma-Marín Area Rail Transit District  
750 Lindaro Street, Suite 200  
San Rafael, CA 94901

Dear Ms. Hames:

Thank you for the opportunity to review and comment on the Draft SEIR for the SMART rail project from Cloverdale to Larkspur, including freight service. The City of Novato City Council has reviewed the document and directed City staff to provide the following comments on the DSEIR.

**1. Projected Service Levels:** The basis for projecting a maximum of eight freight round trips per day is unclear. The City has concerns that the project is being segmented by projecting unrealistically low levels of freight trips and that not all potential impacts will therefore be analyzed. There has been substantial discussion of potential development and/or business activities in Northern California that could contribute to a higher number of freight trips than projected in the DSEIR. Additional trips could increase the environmental impacts of the project. The DSEIR needs to include a worst case scenario projecting the maximum number of freight trips possible under the most extensive business plan and/or service scenario that has been discussed by the NCRA. That scenario needs to be fully analyzed and mitigation measures prepared.

A1-1

It is also unclear whether SMART would in the future propose service expansions. If so, any reasonably expected service level expansions must be analyzed.

A1-2

**2. Freight Service Scheduling:** It is not clear what the relationship is between SMART and the NCRA in regard to control of the scheduling of freight service on weekdays, nights and weekends. Clarifying this question is essential to understanding whether the NCRA would have the right to run all freight service at night if they so choose. Night time freight trips would substantially alter the impacts of freight service and the SEIR analysis would need to analyze the impacts of a worst case scenario of all freight trains running at night. If SMART controls freight service scheduling, a mitigation measure should be included limiting or prohibiting night time freight service. Otherwise the impacts of all freight service occurring at night must be analyzed.

A1-3

**3. Decreased LOS on City Streets:** The DSEIR states that SMART shall pay its fair share of intersection improvement costs to mitigate SMART station

A1-4

## Comment Set A1, cont. City of Novato

Lillian Hames, General Manager  
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traffic impacts at intersections such as Grant/Reichert, Nave/Alameda del Prado and Main Gate/Nave. Since the remainder of the funding for these mitigation measures is dependent on other sources, the necessary mitigation improvements may not be constructed and the impacts would remain unmitigated. This possibility needs to be addressed and full intersection improvement funding identified or the impacts identified as significant unavoidable. Since freight service could compound the impacts by affecting street crossings near stations, the final SEIR should analyze the LOS on city streets for the cumulative impact of passenger and freight service.

A1-4 cont.

A1-5

**4. Localized Emissions:** Air quality impacts are addressed in a cursory manner. For example the discussion of AQ-6, on page C.3-11 states “The addition of weekend service would result in smaller impacts on traffic volumes and intersection performance, and therefore, would not cause the project to violate any CO standards.” The impact discussion is subjective with no supporting analysis nor is there a review of possible cumulative impacts. In addition, the analyses do not fully address all of the pollutants that could cause localized impacts, including the components of diesel exhaust such as sulfur dioxide. The areas where localized air quality impacts could occur are not clearly identified. A mapping scheme showing the location of impacts would be helpful for the public to assess who would be affected.

A1-6

A number of equipment specifications are identified as emissions mitigation measures (“off-road” and “nonroad” engines, anti-idling devices and on-board diagnostics, see page C6.9). These equipment specifications are strictly optional and cannot be considered as mitigation measures. In addition, the analysis should include a discussion of the warning required by Proposition 65 regarding the potential health impacts of project emissions.

A1-7

**5. Alternative Station Location Analysis:** The analysis of the impacts of the various alternative stations locations should include a discussion of the potential for transit oriented development around each site and the possible impacts of such development. The impact analysis of the Stations should include mitigation measures such as requiring low intensity and shielded lighting that eliminate the glare and lighting impacts on adjacent neighborhoods.

A1-8

A1-9

**6. Novato Passenger Depot:** Since the Depot is designated a Historic Structure in the Downtown Novato Specific Plan, CEQA requires that appropriate mitigation measures be adopted regardless of whether the structure is eligible for NRHP designation.

A1-10

**7. Siding Locations and Use:** A map indicating the location of sidings to allow trains to pass should be provided and a discussion included of how train passing would be managed. Further, the potential impacts of these siding locations on adjacent land uses – such as noise and emissions created by an idling diesel locomotive on a siding – should be analyzed.

A1-11

Comment Set A1, cont.  
City of Novato

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**8. Noise Impacts:** Increased noise near sensitive receptors and increased ambient noise levels are identified as significant unavoidable impacts. Mapping the location of noise (and vibration) impacts, as was discussed above in relation to emissions, would assist the public in understanding potential impacts. The mapping should include a comparison to the City of Novato General Plan Noise Element noise level contours and noise standards. The analysis should specifically discuss train horn noise. The City also requests that full volume train horn noise demonstrations be conducted at all locations at which it could be expected the horns would sound.

A1-12

A1-13

The Draft SEIR identifies quiet zones as a potential mitigation measure and correctly states that local jurisdictions must apply for the designation and the designation must be approved. The Draft SEIR should make clear that quiet zones may not be approved and that there then would be no mitigation for noise impacts at street crossings. The Draft SEIR needs to explicitly state that there are no mitigation measures for noise events associated with rail crossings incorporated into the project. As a result, the noise of signals and train horns must be assumed and analyzed. As a consequence, the Draft SEIR must contain an analysis of the impact of train horn noise on the community. A noise analysis should include noise contour projections for single event occurrences during the day and evening.

A1-14

The cumulative noise impact discussion on Page C.6-14 and Table C.6-1 only includes 6 freight train pass-bys (three round trips) and the nighttime traffic scenario projects only one night time freight pass-by. This is not consistent with Speculative Scenario 2 used through out the rest of the document which projects 16 freight pass-bys (eight round trips), nor does it address the maximum number of trip possible (see Comment 1). In addition, as noted in Comment 2, unless freight trips are limited to daytime only, the analysis must address the possibility that all trips could be made at night. Analyzing this scenario could identify substantially more significant noise impacts.

A1-15

A1-16

The station noise analyses utilize noise measurements from sites far removed from the actual proposed station locations. Noise measurements from the proposed sites need to be prepared in order to accurately project potential noise impacts.

A1-17

**9. Vehicle Delays at At-Grade Crossings:** The Draft SEIR states that the impacts on increased emergency service provider delays where streets cross rail lines are insignificant (see C.6-17). In addition, there are cursory statements that additional train service will not create a significant cumulative increase in travel times and queues at at-grade crossings (see Page c.6-6). The criteria for making these assertions are not clearly stated. The City believes that delays of up to three minutes as are identified in the DSEIR are significant in a life or death situation. The number of times these delays could occur are increased with increased numbers of train trips and this impact needs to be better addressed.

A1-18

## Comment Set A1, cont. City of Novato

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**10. Hamilton Ridership Projections:** There is insufficient information on how the Hamilton ridership projections were developed. Hamilton employee, and Hamilton resident use of SMART are not clear from the information presented, nor it is clear how the Hamilton shuttle affects SMART use.

A1-19

The basis for the Hamilton station site ridership projections is unclear. If they are based on 2000 census data for Hamilton, the projections are inaccurate, as there has been substantial residential and commercial development in Hamilton since that time. Also, there are a number of approved commercial projects (such as a 30,000 sq. ft. office complex on Main Gate Road) that do not appear to be included in the analysis.

In addition, there are substantial differences in the projected ridership for the Los Robles station site and the Hamilton site. There should be better clarification of why the differences are so substantial.

**11. Mitigation monitoring:** There is no mitigation monitoring program included in the DSEIR. The program must address deadlines for implementation of all mitigation measures and who is responsible for implementing the measures. This is especially important for mitigation measures such as quiet zones. When will quiet zones be created and who will pay for their implementation?

A1-20

**12. Public Safety:** There are two schools near the Hamilton station site that were not included in the analysis. Any impacts on safety in these particular areas should be discussed, as well as any impacts on Safe Routes to Schools.

A1-21

There is no discussion of who will provide public safety policing at the stations. Policing needs to be discussed and the mitigation monitoring program should identify implementation responsibility and funding for same.

A1-22

**13. Property Values:** Community members would benefit from understanding the possible impacts on property values resulting from the project. The City requests this analysis be included.

A1-23

**14. Sea Level Rise:** The SEIR fails to analyze the long-term effects of sea level rise on the SMART and NCRA infrastructure, including miles of track and roadbed that are in areas projected to be permanently inundated by a modest rise in sea levels. The San Francisco Bay Conservation and Development District should be consulted in this analysis. At a minimum, the SEIR needs to reflect the effects of a one meter and a three meter sea level change and describe the mitigation measures required to protect or adapt any effected SMART infrastructure

A1-24

Comment Set A1, cont.  
City of Novato

Lillian Hames, General Manager  
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improvements. A projected cost estimate for any such mitigation measures must be provided along with a creditable financing plan.

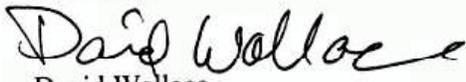
A1-24 cont.

**Procedural Comments:** There are two separate, independent agencies sponsoring inter-related projects: SMART and NCRA. Each agency is conducting a separate environmental review of the project proposed by that agency. The environmental reviews are occurring at different times so there will be no opportunity to compare analyses from the separate documents. There is no way to determine if accurate, consistent analyses are being prepared, or to fully understand the cumulative effects of both projects. The City would prefer that the public comment periods for the two documents overlap or that each document contain a comprehensive cumulative analysis rather than the cursory analysis that the City believes has been presented in the DSEIR.Summary:

A1-25

Thank you again for the opportunity to comment on the Draft SEIR. The City looks forward to the opportunity to review the Final EIR.

Sincerely,

  
David Wallace  
Community Development Director

Cc: City Council  
City Manager  
City Clerk

## **Responses to Comment Set A1**

### **City of Novato**

- A1-1 See Master Response 2 and Section B.3 of the Draft SEIR, which provides details regarding the development of the cumulative impact scenarios. Speculative Scenario 2 addresses the freight trips that might be generated by substantial development and business activities in Northern California, including sources of freight demand such as aggregate shipments and Humboldt Bay container traffic. This level of demand is well beyond current or reasonably foreseeable levels. By analyzing up to 16 individual freight trains per day, the SMART SEIR already provides a “worst case” analysis of the maximum freight operations forecast in any long-range NCRA planning document. Additional analysis of even higher levels of speculative service is unwarranted.
- A1-2 The 2005 DEIR and 2006 FEIR analyzed SMART’s proposed passenger service operations through the year 2025. SMART has proposed no new service increases beyond the 30 minute peak period service included in the DEIR and FEIR other than the four new trains per week-end day analyzed in the DSEIR.
- A1-3 The legislation that created SMART, AB 2224, states that SMART must work with NCRA and the Federal Railroad Administration to achieve safe, efficient, and compatible operations of both passenger rail and freight service along the rail line in Sonoma and Marin Counties. Toward that end SMART will be negotiating a new Operating Agreement with NCRA. As explained in Master Response O in the 2006 FEIR, the existing Operating Agreement with NCRA regarding joint use of the NWP rail line provides that SMART would be responsible for dispatching both passenger and freight trains throughout this section of the railroad. It is not anticipated that SMART’s responsibility for dispatch will change with the new Operating Agreement. Additional constraints on nighttime freight operations could be an additional negotiated term of the new Operating Agreement. As noted on page C.6-2 of the DSEIR, freight service at the levels proposed by NCRA could be accommodated on the SMART right-of-way during daytime off-peak hours without the need for night trains.

It should be noted that, contrary to the comment, it is unlikely that NCRA’s freight operator would propose operating all freight trains at night. The type of commercial freight service proposed by NCRA in the NOP for its Russian River Division Freight Rail Project depends on pick-ups and deliveries to shippers and receivers along the line. At least some of the freight customers along the NWP would maintain normal business hours; access to the sidings that serve these customers would likely occur during business operating hours. An assumption that all freight trains would operate at night is therefore unwarranted. However, because some freight operations could occur at night, cumulative impacts associated with night freight rail service were analyzed in the DSEIR, as noted in the Assumptions on DSEIR page C.6-2 and in the impact analysis on page C.6-14.

- A1-4 Payment of a project’s fair share of the funding for improvements to mitigate a cumulative traffic impact is a common and acceptable mitigation measure (see CEQA Guidelines §15130(a)(3)). This issue is not unique to this project, and could be resolved by (1) developing a joint funding program for intersection improvements that SMART is not completely responsible for, and with new development in the area paying their fair share of costs or (2) the project proponent (in this case, SMART) paying the costs, with repayments from the City, possibly from

new development in the area. It is noteworthy that the City's own studies<sup>1</sup> have, for some years, called for improvements, such as the Alameda del Prado signalization and widening of approaches, and the Nave Drive/Main Gate right-turn overlap phasing. Therefore, these improvements would be required in the long term even without the SMART project, according to the City's traffic analysis.<sup>2</sup>

- A1-5 The cumulative impact of passenger and freight operations on street crossings was fully analyzed in the 2006 FEIR, supplemented with additional information on pages C.6-5 – C.6-7 of the DSEIR. The cumulative impact of freight and passenger operations will not be significant for the reasons identified in the 2006 FEIR. Also, please note that freight service would not operate south of Highway 37.

There are no established impact significance thresholds for train operations (freight or passenger). The delay caused by train traffic at street crossings is occasional (several times a day) and intermittent, as opposed to the delay caused by a traffic signal, which may cycle through its indications of red-green-yellow a thousand times a day, or more. For this reason, it is not surprising that none of the agencies had written statements stating what constitutes an environmentally significant impact for rail operations. This contrasts with all of the jurisdictions having impacts for traffic on traffic signals, which is based on a maximum delay. Therefore, it is not possible to "analyze the LOS on city streets for the cumulative impact of passenger and freight services." Rather, the approach has been to disclose what the vehicle delays caused by individual train movements would be, for both the passenger and freight services.

- A1-6 Localized impacts would be short term and would occur less frequently during each day of weekend service than during days of weekday service. The maximum potential concentrations of carbon monoxide, the pollutant most likely to cause adverse localized concentrations, were disclosed in the 2005 DEIR and 2006 FEIR and determined to be less than significant. The short-term impacts for weekend service are described qualitatively because localized concentrations would diminish quickly after each pass-by and would not be cumulative due to their short-term nature (the source would only be present during the moments of the pass-by). Modeling localized concentrations of all the pollutants emitted, for example sulfur dioxide, is not necessary because the less than significant quantities emitted would not be likely to result in concentrations approaching the ambient standards. Because impacts from localized pollutants would be less than significant, mapping of localized concentrations of these pollutants would not provide meaningful information. The analysis of cumulative air quality impacts from localized concentrations of pollutants is addressed in Section C.6.3.1 on page C.6-10. Additional details on the methodology for analyzing air quality impacts are in the 2006 FEIR (pp. 4-37 to 4-39).

- A1-7 The emission controls identified in the cumulative air quality analysis in the DSEIR are those that have been proposed by NCRA for use in its freight project. To disclose the potential cumulative impacts of passenger and freight service, the DSEIR considers the reasonably foreseeable freight operations scenario, including information provided by NCRA regarding equipment specifications. As noted on DSEIR p. C.6-10 (in footnote 12), the DSEIR

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<sup>1</sup> W-Trans, *Final Report 2002 Citywide Traffic Model Update*, for the City of Novato, April 16, 2000, page 3.

<sup>2</sup> W-Trans, *2002 Citywide Traffic Model Update* for the City of Novato, April 2002. Page 3 notes the need to "signalize and widen approaches" at Alameda del Prado/U.S. 101 overpass; this is identified as "Newly Identified Traffic Improvements in the 2001 Analysis. At Nave Drive/Main Gate it is noted there is a need to, "add right turn overlap phasing to the signal operation;..." This is identified as a recommended improvement but not included in the development impact fee. Reichert/Grant was not among the studied intersections.

conservatively assumes that the freight locomotives would emit at the allowable limit, although vendor information indicates they would emit well below those levels. It is important to note that NCRA is in the process of preparing its own EIR on its proposed freight operations. According to NCRA, the emission controls will be included in that document either as environmental compliance measures incorporated into the project or as mitigation measures. In either case, they would be incorporated into that project's enforceable mitigation monitoring program required by CEQA.

Proposition 65 requirements are distinct and separate from CEQA requirements. If freight rail operations become subject to the provisions of Proposition 65, appropriate warnings will be provided, as required by law. This would be an applicable regulatory requirement, rather than a mitigation measure.

A1-8 Transit-oriented development (TOD) is not proposed as part of SMART's project. If TOD-type development were to be proposed in the future on properties around the station sites, it would be subject to additional environmental review by the City and the provisions of the City's General Plan. The ridership projection did not assume any transit-oriented development on the property immediately adjacent to the Hamilton Station. The other two sites would not be appropriate for TODs; the downtown site is built out and would require amendment to the downtown specific plan; the Ignacio Wye site is not appropriate because of the poor access and environmental sensitivity of the location, as described in the DSEIR.

A1-9 The 2005 Draft EIR Mitigation Measure V-2 identified mitigation for lighting impacts and the proposed SMART project includes use of shielded lighting at the stations and other measures to reduce glare and lighting impacts on surrounding properties. During final design of the stations, the lighting plan will incorporate these measures. SMART has committed to these design features, as part of their environmental compliance measures included in the 2006 FEIR (page 4-11). The Draft SEIR reiterates these features (page C.5-46) in the discussion of visual impacts at the Hamilton alternative station site.

A1-10 Comment noted. No changes to the Depot structure are proposed. The text on DSEIR page C.5-10 states that consultation with the City of Novato would occur to ensure that impacts at the site are minimized. Furthermore, an environmental compliance measure in Section B.4 of the DSEIR states that any new structures or lighting shall be designed to be sympathetic to the local historic character and landscaping/spatial patterning, and designed in consultation with the City of Novato.

A1-11 SMART's proposed siding locations are described and analyzed in the 2005 DEIR and 2006 FEIR. Siding locations are shown on the revised maps in the 2006 FEIR Appendix E Revisions. Regarding freight sidings, see the assumptions on pages C.6-3 and C.6-4 of the DSEIR; see also Master Response O in the 2006 FEIR.

As noted in the DSEIR on page C.6-3, SMART is not proposing any new sidings beyond those already analyzed in the prior FEIR. Noise and emissions due to SMART passenger service and use of sidings would not change from the impacts disclosed in the 2005 DEIR and 2006 FEIR. Use of SMART sidings for passenger operations would be brief, as the passing of a passenger rail vehicle would take only a few seconds. See also SMART's Air Quality Mitigation Monitoring Plan, page 5-31 of the 2006 FEIR, which limits passenger train idling to 15 minutes. See DSEIR Section C.6 for a discussion of how freight service would use their sidings, and the expected impacts on air quality (p. C.6-11) and noise (p. C.6-15).

- A1-12 Increased ambient noise from passenger train pass-bys is identified as less than significant for SMART's proposed project, both as originally proposed (see 2005 DEIR and 2006 FEIR) and with added weekend service and/or the use of light DMUs. As disclosed and analyzed in the 2006 FEIR, the only significant and unavoidable project-level noise impact from passenger operations is from train horns at grade crossings in the absence of Quiet Zones. The project's consistency with local general plans, including noise standards set forth in the plans' noise elements, was adequately analyzed in the 2005 DEIR and would not significantly change with the revisions analyzed in the DSEIR. Significant and unavoidable cumulative noise impacts due to freight service are adequately described in the DSEIR (see Section C.6).
- A1-13 Train horn noise was evaluated and mitigation identified in the 2006 certified FEIR using appropriate regulatory standards and criteria (see 2005 DEIR, Section 3.7). A demonstration of train horn noise is not required for environmental analysis. Train horns can be experienced in the Bay Area on the three long-term operating commuter rail systems along the Capital Corridor, Altamont Commute Express or Caltrain. Along the Caltrain system, train horns can be heard in the residential neighborhoods of Palo Alto and Atherton. As noted in the 2006 FEIR and DSEIR, SMART proposes to fund Quiet Zones as mitigation for train horn noise. The 2008 SMART Funding Plan includes a recommendation to triple the amount of funding allocated to Quiet Zone crossings. Also, see Master Response 5.
- A1-14 The impact of train horn noise and the ability of Quiet Zones to mitigate this impact was disclosed in the 2005 DEIR and 2006 FEIR and explicitly characterized as significant and unavoidable, both at the project level and cumulatively, in the event that Quiet Zones are not implemented. See 2006 FEIR Figure 3.7-6 for contours of passenger train horn noise. See also Master Response 5.
- A1-15 The analysis and table referred to in the comment address DSEIR Section C.6.4.1, which analyzes cumulative impacts of the reasonably foreseeable freight operations that are likely to occur as proposed by NCRA. Noise impacts associated with Speculative Scenarios 1 and 2 are addressed in DSEIR Section C.6.4.2, with significant noise impacts identified for both scenarios. See DSEIR Sections B.3 and C.6.1 for details on the cumulative scenarios and the methodology for analysis. NCRA is in the process of preparing its own EIR on its proposed freight operations, including cumulative impacts.
- A1-16 The possibility of night-time freight operations is acknowledged (see p. C.6-2) and analyzed (see p. C.6-14). As noted in the DSEIR, NCRA's proposed level of freight service could be accommodated on the SMART right-of-way during daytime off-peak hours without the need for night trains. Since the freight operator may nevertheless opt to run freight trains at night for independent operational needs, impacts associated with night-time freight service are also discussed. The DSEIR Section C.6.4.1 shows a significant cumulative noise impact associated with NCRA's proposed level of freight service and notes that additional night-time freight traffic would result in greater impacts (p. C.6-14). See also response A1-3.
- A1-17 To accurately determine potential maximum noise impacts, it is not necessary to show the existing noise levels at every location around the stations. The DSEIR shows the expected noise levels with the project near the edge of right-of-way and at relevant noise-sensitive locations. As shown in the 2006 FEIR, except for train horn noise, passenger train noise would only adversely affect receptors within 100 feet of the tracks. The Roblar Drive measured noise levels (of 58 dBA Ldn as shown in 2005 DEIR Table 3.7-3) are the most representative levels for this portion of the corridor. Noise levels at other more urban sites in the area are higher (e.g., 64 Ldn at Railroad Avenue and West Orange Avenue in Novato) than

what would be expected at the Hamilton station site, and away from traffic, levels are lower (e.g., 48 Ldn at Smith Ranch Road in San Rafael). Even if existing conditions at the Hamilton Station Site are assumed to be similarly quiet at 48 Ldn, the nearest residence would need to be within 80 feet of the track to experience an adverse impact of 53 Ldn or within 30 feet of the track to experience a severe impact of 59 Ldn (based on 2006 FEIR Table 3.7-5). Because the residence closest to the Hamilton Station Site would be about 300 feet away, no further measurements are needed to show that no adverse impact would occur.

- A1-18 As explained in the DSEIR (pp. C.6-5 – C.6-7 and C.6-17), project-level and cumulative impacts of train operations on vehicle delays at crossings, including the impact on emergency response vehicles, were fully analyzed in the 2005 DEIR. The DSEIR provides additional information regarding these less than significant impacts. This railway corridor has been an operating rail line for more than 100 years. SMART trains would stop traffic at railroad crossings for at most only 35-40 seconds. SMART passenger trains and NCRA freight trains would not have a cumulative impact on delays at intersections for the reasons stated in the 2005 DEIR and DSEIR. Any significant impact caused by freight trains would be NCRA’s responsibility to mitigate.

It should be noted that all of the larger cities along the tracks, including San Rafael, Novato, Petaluma, Rohnert Park, and Santa Rosa, have multiple (ranging from 3 to 8) fire stations with a least one on each side of the railroad tracks. This distributed approach to fire service coverage, and in some cases paramedic services as well, minimizes the probability of these emergency responders needed to cross tracks and potentially encountering at-grade crossing delay. Novato has fire stations on both sides of the tracks, e.g., Fire Station 1 is west of the tracks at 7025 Rowland Blvd.; Fire Station 2 is east of the tracks at 450 Atherton Avenue; Fire Station 4 is at 319 Enfrente Drive (near Ignacio Blvd, which is grade separated over the tracks). A number of grade separated alternatives for emergency first responders exist in Novato, including DeLong Avenue and San Marin Drive. These primary roadways are elevated over the tracks. SMART has further agreed to establish an emergency communications link between first responders and its dispatching center that could allow for holding trains in the event of a critical emergency. This was stated both on page 4-8 and in Chapter 5, Table 2 (Environmental Compliance Measures) under Security/Public Safety in the sixth bullet, of the 2006 FEIR. The following additional point should be noted: all SMART trains would “fit” within station areas and would not block adjacent cross streets. Even in cases where at-grade crossings are close to stations, the gates would go up (allowing the passage of vehicles) once the train is fully stopped, and loading passengers. Freight trains would not stop at stations.

- A1-19 See Master Response 3 regarding Hamilton ridership projections.
- A1-20 A mitigation monitoring program is not required in the Draft SEIR. A comprehensive mitigation monitoring plan was included in the 2006 FEIR and will be readopted by the SMART Board when it makes the necessary CEQA findings for approval of the 2008 sales tax ordinance. The 2006 mitigation monitoring plan already includes environmental compliance measures proposed as part of the project, such as Quiet Zones. Additional mitigation measures identified in the DSEIR will be incorporated into the 2006 plan prior to its adoption.
- A1-21 The text of Section C.5.3.9, Public Safety (Setting and Impacts), has been revised. The SMART project has the overall public safety benefit of removing commuter vehicles from the highway and providing increased passenger safety compared with automobiles, as detailed in Master Response P of the 2006 FEIR. Nonetheless, local traffic in the vicinity of stations may slightly increase. See Master Response 4 regarding traffic issues around the Hamilton Station

site. A city-wide Safe Routes to School project is being carried out in the City of Novato concurrent with the permitting requirements for the SMART project and SMART will coordinate with the City of Novato on the Safe Routes to School project. The Safe Routes to School project's safety improvements include installation of florescent yellow-green advance school warning signs and markings, high-visibility yellow crosswalk markings, walkway improvements, and traffic-calming measures. A number of these improvements are taking place specifically in the vicinity of Hamilton Elementary, among other locations throughout the City, and will serve to reduce automobile-related safety incidents with schoolchildren. Safety impacts on schoolchildren from the Hamilton Station will remain less than significant as described in the Draft SEIR.

- A1-22 SMART's responsibility to provide rail security has not changed since publication of the 2006 FEIR; only the location of the Novato South Station has been proposed to be changed in the SEIR. As noted in the 2006 FEIR, Master Response P, security services for the proposed project would be provided either by in-house personnel, contracted local law enforcement, contracted security firms, or some combination. Personnel working in rail operations often provide a primary level of security. Security may be supplemented with contracted personnel that patrol and monitor stations, platforms, parking facilities, and administrative buildings and/or with security cameras to monitor stations and station parking lots. SMART's Expenditure Plan includes a line item for the costs of providing security services. The precise details of security service contracts will be established in the future in consultation with local jurisdictions and first responders. The provision of station security patrols will serve to deter crime at the proposed Hamilton Station.
- A1-23 Although property value impacts is not a CEQA issue, this issue is addressed in the 2006 FEIR in Master Response T.
- A1-24 This comment requests additional analysis of the potential impacts associated with the proposed project's infrastructure. This is a comment on the adequacy of the analysis in the 2006 FEIR and/or 2005 DEIR and is outside the scope of the SEIR. See Master Response 1. Please note that if track areas are identified in the future as being susceptible to sea inundation, adjustments to the rail bed can be made with additional ballast. See also response B6-1.
- A1-25 As described in Section B.3 (Revised Cumulative Impact Scenario) of the DSEIR Project Description, NCRA and SMART are independent governmental agencies proposing separate projects that will have cumulative impacts in some issue areas. As required by CEQA, the SMART DSEIR analyzes the reasonably foreseeable cumulative impacts that may occur as the result of both projects based on available information. SMART's EIR technical consultants consulted with NCRA's EIR technical consultants in preparing the DSEIR analyses to ensure consistent analyses to the extent possible. The public and decision makers will have the opportunity to evaluate and comment on the project-specific details of NCRA's proposed freight service when NCRA releases its DEIR for public review. There is no requirement in CEQA that the public comment periods for the EIRs prepared for two separate projects proposed by two separate agencies overlap. See also Master Response 2.

## Comment Set A2 California Department of Transportation

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

ARNOLD SCHWARZENEGGER, Governor

### DEPARTMENT OF TRANSPORTATION

111 GRAND AVENUE  
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TTY 711



*Flex your power!  
Be energy efficient!*

April 23, 2008

SON/MRN-GEN  
SON000124  
SCH # 2002112033

Ms. Lillian Hames  
SMART District  
750 Lindero Street  
San Rafael, CA 94901

Dear Ms. Hames:

#### **Sonoma–Marín Area Rail Transit (SMART) Project – Draft Supplemental Environmental Impact Report (DSEIR)**

Thank you for continuing to include the California Department of Transportation (Department) in the environmental review process for the SMART project. Based on the review of the DSEIR, we have the following comments:

##### ***Weekend Service***

The Department supports the proposal to add weekend SMART service as a further step to increase modal alternatives in the US 101 corridor in Sonoma and Marin. SMART service in general would provide a viable alternative to US 101, especially where it passes through downtown areas, making them more accessible and attractive and thereby complementing the region's investments in focused growth.

While overall traffic congestion is lower on weekends when traffic is more evenly distributed throughout the days, as described in the Transportation section (C.3.1) of the DSEIR, the rail service would provide an attractive alternative to freeway travel to recreational and weekend event destinations along the corridor (and/or in San Francisco). However, it is important that the weekend service be coordinated with Golden Gate Transit and major destination centers, such as National and State Parks, and others to ensure feeder services are provided to the stations.

##### ***Downtown Novato Site***

The Downtown Novato station site is the alternative with the highest potential for drawing ridership from non-motorized travelers as a third of the population lives within a one-mile radius of the station. The site is close to mixed-use developments and provides both destinations as well as origins for trips.

A2-1

A2-2

*"Caltrans improves mobility across California"*

Comment Set A2, cont.  
California Department of Transportation

Ms. Lillian Hames/ SMART District  
April 23, 2008  
Page 2

For better access to the station we recommend that the pedestrian and bicycle crossing at the southern end of the platform be included into the project to connect to the existing multi-use path that is part of the Bay Area Trail system.

A2-3

In order to address the issue of lack of parking near the station, SMART could explore the option of shared parking for example with the nearby Whole Foods store and/or other businesses.

A2-4

**Hamilton Site**

The Hamilton location is projected to generate the most ridership and growth in ridership, given existing and planned housing at the former Air Force base and business employment expansion in the hangar area. Also, there is ample room for parking and Hamilton's SFO Airport terminal is nearby, thus providing a good opportunity to connect to SFO.

A2-5

Regarding noise and safety issues mentioned on page C.5-44, to mitigate vehicle and pedestrian safety hazards, we recommend that the Hamilton Parkway at-grade railroad crossing be upgraded by installing Federal Railroad Administration (FRA) approved Supplemental Safety Measures and to establish a Quiet Zone designation as allowed by the FRA.

A2-6

**Future Freight Operations per NCRA Proposal**

Page B-23: B.3.3 Maximum Freight Service – Speculative Scenario 2:  
For information purposes: A project to rehabilitate the northern corridor of the NWP railroad from the Port of Humboldt Bay to South Fork, and implement sediment control from the Humboldt Bay to reduce shoaling at its entrance, was submitted for funding to the Proposition 1B Trade Corridor Improvement Fund (TCIF) program (total project cost: \$38.3 million). TCIF program requirements dictate a 1:1 funding ratio and approximately 50 percent (\$ 19.1 million) in local funding has been identified. While this project was not funded, other sources at the federal level may become available allowing this project to move forward.

A2-7

Should you require further information or have any questions regarding this letter, please call Ina Gerhard of my staff at (510) 286-5737.

Sincerely,



LISA CARBONI  
District Branch Chief  
Local Development/Intergovernmental Review

c: State Clearinghouse

"Caltrans improves mobility across California"

## **Responses to Comment Set A2**

### **California Department of Transportation (Caltrans)**

- A2-1 Comment noted. SMART is committed, as noted in the letter, to working with Golden Gate Transit and other transit operators to coordinate weekend (as well as weekday) transit services; and to coordinate with owners of major recreational destinations in the corridor, such as National and State Parks.
- A2-2 The highest projected overall ridership is at the Hamilton site, not the Downtown Novato site. Please see Master Response 3 regarding ridership estimates at Hamilton. While it is correct that the downtown site has a higher population within a 0.5-mile radius, the site is constrained by having no land available for parking. The downtown location would probably draw somewhat more non-motorized trips than Hamilton, but this would be more than made up for by the additional park-and-ride trips at Hamilton due to its station parking.
- A2-3 The planned pedestrian crossing at the south end of the platform of the Downtown Novato Station is for the exclusive use of passengers going to and from the trains. This is not a designated public crossing but essentially a private crossing. In order to integrate the bicycle/pedestrian pathway into the crossing at the south end of the platform, an application for a public at-grade crossing would have to be made to the CPUC. The existing public at-grade crossing at the north end of the platform at Grant Avenue would allow the public to cross the tracks. Both SMART policy and CPUC policy is to discourage the creation of new public at-grade crossings.
- A2-4 Comment noted. SMART would be open to the idea of shared parking where feasible.
- A2-5 Agreed. Connections to the Marin Airpórtér could be made here, and/or at the Larkspur terminal.
- A2-6 The comment requesting Quiet Zone upgrades at Hamilton Parkway is noted. However, this comment does not relate to the adequacy of the DSEIR. See Master Response 5 regarding quiet zone mitigation and implementation.
- A2-7 Comment noted. It is SMART's understanding that no Proposition 1B funding was allocated to NCRA. SMART is unaware of any additional federal funding that has been approved for freight rail service to the Bay of Humboldt. The conclusion in the DSEIR that freight service in that area is not a reasonably foreseeable cumulative project within the meaning of CEQA is unchanged. See Master Response 2.

## Comment Set A3 North Coast Railroad Authority



North Coast Railroad Authority  
419 Talmage Road, Suite M  
Ukiah, CA 95482  
(707) 463-3280  
<http://www.northcoastrailroad.org>

April 24, 2008

Ms. Lillian Hames  
SMART  
750 Lindero St., No. 200  
San Rafael, CA 94901

Subject: Comments on Draft Supplemental EIR

Dear Lillian,

Thank you for this opportunity to comment on SMART's Draft Supplemental EIR for the Sonoma-Marín Area Rail Transit Passenger Rail Project. NCRA submits the following comments:

1. NCRA is in the process of preparing a Draft EIR for freight operations along the Russian River Division. As part of this process, several technical studies are being prepared that will provide updated and more in-depth information than was included in NCRA's Initial Study. In preparing its cumulative analysis, SMART used information from NCRA's Initial Study because this was the best information available at the time. It is anticipated that the cumulative traffic, noise, and air impacts described in NCRA's Draft EIR will support the findings in SMART's Draft Supplemental EIR, but with slight differences in technical calculations.
2. On page C.6-2 reference is made to "potential impacts unique to freight, such as hauling odorous or dusty loads." NCRA wishes to clarify that all cars hauling trash would be fully enclosed.
3. Regarding Truck Traffic Offsets (page C.6-3), comparing the results of technical studies performed to date for NCRA's Draft EIR with SMART's conclusions in the Draft SEIR, NCRA generally supports SMART's findings, however, NCRA's conclusions in regards to the number of trucks diverted from the Highway 101 corridor show that a higher number of trucks will be displaced as a result of resuming freight rail service, hence resulting in an even greater benefit to the area than the SMART analysis concluded.
4. The information and data regarding additional freight service used in SMART's speculative scenarios was not obtained from NCRA. The freight service for the proposed NCRA Russian River Division project has been identified in the project description provided in NCRA's Initial Study.
5. On page C.6-13 the cumulative noise levels along the SMART project route are analyzed. Comparing the results of technical studies performed to date for

A3-1

A3-2

A3-3

A3-4

A3-5

**Comment Set A3, cont.**  
**North Coast Railroad Authority**

Ms. Lillian Hames  
April 24, 2008  
Page 2 of 2

NCRA's Draft EIR with SMART's conclusions in the Draft SEIR, NCRA generally supports the finding that there are unavoidable significant impacts related to noise, but with differences in assumptions and detailed output.

6. On page C.6-13 SMART references its 2006 FEIR Mitigation Measure N-5 for Quiet Zones. It is anticipated that NCRA will have different Mitigation Measures than SMART, and that this is appropriate because of the nature of the two different projects undergoing environmental review. SMART's project includes stations, trails and expanded right-of-way that will require more extensive mitigation than NCRA anticipates for restoring freight service on existing right-of-way.
7. NCRA strongly encourages SMART to pursue either obtaining an FRA waiver of the requirements of 49 CFR Part 238 to operate light DMUs, or consider using heavy DMUs until such time a waiver can be obtained, so that NCRA's presumptive operator can provide freight service at the same time as SMART's commuter service will be operating in the SMART Corridor.

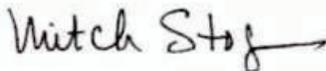
A3-5 cont.

A3-6

A3-7

If you have any questions regarding these comments please contact me at (707) 463-3280.

Sincerely,  
North Coast Railroad Authority



Mitch Stogner  
Executive Director

## **Responses to Comment Set A3 North Coast Rail Authority (NCRA)**

- A3-1 As described in Master Response 2, the NCRA Draft EIR will provide additional details on NCRA's project.
- A3-2 Comment noted. The SMART Draft SEIR acknowledges on page C.6-16 that potential trash hauling by NCRA would be in enclosed freight cars.
- A3-3 Comment noted. The DSEIR took a fairly conservative view of the truck offset issue, e.g., assuming that 100% of freight railcars would be returned empty. Less conservative assumptions may be valid and supported by NCRA's more specific project-level analysis.
- A3-4 It is true that the speculative cumulative scenarios were not based on NCRA's 2007 Initial Study. The basis for the speculative cumulative scenarios is provided in Draft SEIR Section B.3.
- A3-5 Comment noted.
- A3-6 The comment regarding different project-specific mitigation measures is noted.
- A3-7 Comment noted. The decision regarding the type of vehicle that will be used in the SMART project has not yet been made. The DSEIR provides the necessary environmental analysis of light DMUs if the SMART Board were to choose that option.

Comment Set A4  
City of San Rafael



April 24, 2008

Ms. Lillian Hames  
SMART General Manager  
750 Lindero St. #200  
San Rafael, CA 94901

**Re: Comments on the Supplemental Environmental Impact Report for the Sonoma-Marín Area Rail Transit Project**

Dear Ms. Hames:

The City of San Rafael begins its comments by noting its continued support of the establishment of commuter rail service from Sonoma County through San Rafael to Larkspur. We appreciate the opportunity to comment on the Draft Supplemental Environmental Impact Report, released March 2008.

The Draft Supplemental Environmental Impact Report (DSEIR) reviews impacts from the following changes in service reviewed in the project's certified EIR: weekend service, an alternative vehicle, alternative station sites in Novato, and an update of changes in future NCRA freight service.

After reviewing the DSEIR, we have the following comment regarding **Weekend service**. Table C.3-4A "Saturday Peak Hour Level of Service Analysis for Downtown San Rafael" (page C.3-8) states that:

- Delay at Mission Avenue and Irwin St./NB 1010 will increase from 36.9 seconds (LOS D) for existing conditions to 92.1 and 93.1 seconds (LOS F) in 2025 without and with the project.
- Delay at 5<sup>th</sup> and Irwin Streets will increase from 27.1 seconds (LOS C) for existing conditions to 108.5 seconds (LOS F) in 2025 either without or with the project.

These increases in delay are substantial, and not consistent with the projected delays at other intersections in the vicinity. We would like to see the source of this data to better understand these projected impacts.

The City's primary concern continues to be the grade-crossing impacts from the rail traffic on the downtown traffic signal operation system. The traffic signal system and the train operations determine the street network operations. The City looks forward to more detailed work coordinating with SMART's traffic engineering consultant to provide the optimal signal timing and roadway operations in Downtown with the SMART rail service.

Sincerely,

s/Linda M. Jackson

CITY OF SAN RAFAEL  
Principal Planner

*Community Development Department*  
1400 Fifth Avenue, P.O. Box 151560, San Rafael, CA 94915-1560  
Phone: (415) 485-3085 • Facsimile: (415) 485-3184

A4-1

A4-2

## **Responses to Comment Set A4**

### **City of San Rafael**

- A4-1 Information on the weekend level of service analysis was mailed to Ms. Jackson on April 29, 2008 in response to her letter. The data included the level of service calculation sheets. The reason for the substantial increase in delay is that as vehicle traffic volumes increase, the increase in delay is not a straight line, but rather increases faster than the increase in traffic volume. For example, a 10% increase in traffic volume at a signal operating at LOS D will normally cause more than a 10% increase in the average vehicle delay. This was based on a growth factor developed from the City's current General Plan. The resulting amount of growth assumed for the analysis may be overstated. In any case, the additional delay caused by the SMART project would be less than one second and therefore less than significant.
- A4-2 This is a comment on the project analyzed in the 2006 FEIR and not on the adequacy of the DSEIR's environmental analysis. SMART is aware of the City's concerns, and SMART's consultants have been working with the City to create a downtown traffic simulation for evaluating and testing the best possible signal timing plans and hardware configuration for trains.

Comment Set A5  
Novato Unified School District



**NOVATO UNIFIED SCHOOL DISTRICT**

1015 SEVENTH ST. • NOVATO, CALIFORNIA 94945 • TEL: (415) 897-4201 • FAX: (415) 898-5790

Dr. Jan La Torre–Derby  
Superintendent

Ms. Lillian Hames  
SMART General Manager  
750 Lindaro Street, #200  
San Rafael, CA 94901

April 24, 2008

Subject: SMART Supplemental Environmental Impact Report (SEIR) Comments

Dear Ms. Hames,

The Novato Unified School District (NUSD) has reviewed the subject SEIR and offers the following comments:

1. The SEIR acknowledges the NUSD owning the property housing the Novato Charter School, but does not indicate the Public Benefit Transfer process the NUSD is engaged in with the Department of Defense (DoD). The property to the northwest of the charter school is known as parcel 1A and parcel 1B (see attached exhibit) and is referenced in the SEIR as “vacant”. This land is expected to transfer from the DoD to NUSD in June of 2008. The property is slated to become an alternative education center. The combined property lines of the charter school parcel and parcel 1B contiguous to the railroad right of way is 1,374 linear feet. **A5-1**
2. School drop-off times produce increased traffic pressure, both vehicular and pedestrian. Morning drop-off coincides with morning commute times. Many of the students attending the Novato Charter School, the future alternative education center and the Hamilton Elementary School (located on Main Gate just off Nave) presently walk or ride their bikes from home to school. Much of the housing in the area is located on the east side of the tracks and will require children on foot/bike to cross the railroad tracks to attend these schools located on the west side of the tracks. A well worn pedestrian path presently exists at the end of State Access Road where it used to cross the tracks. Children presently cross the tracks in many locations. The only developed track crossing at this time is Main Gate Road, which is a busy street. Some method allowing school children on foot and bike to cross the tracks at multiple locations is needed. **A5-2**
3. The NUSD is concerned about air quality, noise and vibration near our campuses, especially if the Hamilton site is chosen for a station. The SEIR indicates the Novato Charter School is 200 feet from the station. While the present locations of the schools building are that distance, the area between the buildings and the property line contiguous with the railroad right of way includes areas where children spend considerable time. This area includes playfields, playgrounds and an organic garden. Just to the north of the playfield, the Nexus Academy (the first phase of the alternative education center) is housed. Some of these activities occur much closer to the tracks than 200 feet. In addition, the NUSD is anticipating remodeling building 971 (the former PX located on parcel 1A) and adding additional buildings on parcel 1B after the land transfer. Please review the present and proposed uses of the NUSD property contiguous to the railroad right of way for air quality, noise and vibration issues. **A5-3**

“An Equal Opportunity Employer”

BOARD OF TRUSTEES: Debbie Butler, Cindi Clinton, Thomas Cooper, Derek Knell, Ross Millerick, Leslie Schwarze, Jennifer Treppa  
<http://www.nusd.org>

**Comment Set A5, cont.  
Novato Unified School District**

4. The SEIR indicates correctly that the charter school parcel is elevated above the present tracks. The elevation differential diminishes as you progress north from Main Gate Road. Shortly beyond the playfield, the elevation drops to track level. The protection afforded the charter school parcel due to elevation differential does not exist for parcels 1A/1B. In addition, the fencing that exists between the charter school and the railroad right of way does not extend all the way to State Access Road. Please review these conditions for parcel 1A/1B.

A5-4

The Novato Unified School District looks forward to your responses to the above concerns. Should the comments be unclear or confusing, please do not hesitate to contact me for further clarification. I am also available to meet onsite if needed.

Sincerely,

John Silvestrini  
Executive Director of Facilities, Maintenance, and Operations  
Novato Unified School District  
1015 Seventh Street  
Novato, CA 94945  
(415) 897-4245



## **Responses to Comment Set A5**

### **Novato Unified School District**

A5-1 The information regarding future use of the land adjacent to the Novato Charter School was not made available to the EIR preparers during the scoping process. This information has been added to the environmental analysis in the land use and safety sections of the SEIR (see Section 3 of this FSEIR). However, the overall conclusions of the Draft SEIR and previous 2006 FEIR are not changed by this information

A5-2 This is a comment on the original SMART project, studied in the 2006 Final EIR, not on the Draft SEIR. Rail crossings would not change as a result of placing the Novato South Station at Hamilton. There are two existing public crossings in the vicinity of the Novato Charter School and the Hamilton Elementary School. The Main Gate Road crossing is an existing grade separated crossing in the form of an overpass for vehicles, bicycles and pedestrians. The other crossing is an existing unimproved at-grade crossing at State Access Road. Prior to commencement of rail service, the informal crossing near the Hamilton Station site at State Access Road would be upgraded to provide gates, signals and other warning devices to provide a safe crossing. This is the location for the planned bicycle/pedestrian pathway crossing, (the pathway would cross from the east side of the tracks to the west side at this crossing), so children walking to school could cross at this site.

In order to add additional public crossings, an application would have to be made to the CPUC. In general, both SMART policy and CPUC policy is to discourage the creation of new public at-grade crossings. The planned bicycle/pedestrian pathway between Main Gate Road and State Access Road (0.31 miles north of Main Gate Road) will be located on the west side of the track and a safety structure or fence will be placed between the pathway and the track the entire distance. Therefore, in addition to existing fencing, a safety structure will be located between school facilities and the tracks. The pathway will parallel the boundary of the school. The pathway information and analysis was provided in the 2005 Draft EIR.

See Master Response 4 regarding Hamilton station site traffic concerns. It should be noted that most SMART patrons would generally be arriving prior to class start times at Hamilton Elementary; classes currently start at 8:30 or 8:50 AM, and most SMART patrons would be at the station well before then. Similarly, in the afternoon, school dismissal (depending on the day of week and grade) is at 1:50 or 2:55 PM; most SMART patrons would be leaving the Hamilton Station between 5-6:30 PM. The Novato Charter School classes start at 8:30 AM and end at 3 PM, except kindergarten, which is 8:45 AM to 12:45 PM. SMART is also committed to working with local schools and police departments to create an education program to make students aware of where and how to cross train tracks safely; this was also identified in the 2006 FEIR. A driveway entrance on Main Gate Road is not expected to present any more danger to students than a driveway to any other business, and probably less so because the station driveway's use will primarily be outside of normal hours when pupils might be walking to school.

A5-3 The proximity of the Novato Charter School to the Hamilton Station Site in its existing configuration and the potential air quality, noise, and vibration impacts are described in DSEIR Sections C.5.3.2 and C.5.3.8, respectively. For air quality, DSEIR Section C.5.3.2 finds that localized concentrations from passenger service would not adversely affect residences at greater than 75 feet from idling trains. The analysis for residential locations assumes a person would be exposed over a 70-year lifetime, thus providing a worst-case analysis (see Section

C.6.10). Outdoor use of the playfields or proposed school buildings would involve less exposure of children or workers than assumed for residences.

The Hamilton Station platform would be almost entirely south of the homes on Marblehead Lane and Parcels 1A and 1B of the school district property. New school uses on Parcels 1A/1B would not be adversely affected by station activities (air emissions or noise) because they would be separated from the station platform site by more than 75 feet. Regarding train passby emissions, on Parcel 1B, school uses would not be within 30 feet of the tracks where the traveling trains would pass by. Since the 2006 FEIR Table 3.5-11 (p. 4-39) shows that a distance of 30 feet would be a sufficient buffer to ensure less than significant cumulative localized air emission impacts with SMART and NCRA's proposed freight service, school use of Parcel 1B north of the station platform would not experience significant health risk impacts.

For noise, DSEIR Section C.5.3.8 referred to the analysis in the 2005 DEIR and 2006 FEIR, which determined that passenger rail service noise at distances greater than 50 feet from the tracks would be less than 60 dBA Leq and therefore less than significant (2005 DEIR p. 3-136 and 2006 FEIR Table 3.7-5). See the 2005 DEIR and 2006 FEIR for a discussion of vibration impacts of the heavy DMUs, which were less than significant.

A5-4

The discussion in the SEIR was focused on the conditions adjacent to the Hamilton Station site location. Parcel 1A is not adjacent to the station site, and it appears that only a very small portion (if any) of Parcel 1B would be across the tracks from the station, as the station site is closer to Main Gate Road. Safety considerations associated with the rail tracks is an issue analyzed in the original 2005 Draft and 2006 Final EIR. The only new issue studied in the SEIR is the potential location of a station at the site, which would not change the overall number of rail trips along the corridor. School property adjacent to the station area is elevated and fenced, as stated in the Draft SEIR. Although the school is not continuously elevated and the school's fence does not extend the entire length of its boundary with the railroad tracks, SMART's proposed security features for the pedestrian/bicycle pathway would provide a safety structure in the vicinity of the school. As shown in Figure 1 of Appendix E of the 2005 DEIR, between Main Gate Road and North Hamilton Parkway, SMART proposes to install a safety structure. As explained in Section 2.5.2 of the 2005 DEIR, SMART will install these safety structures between the pedestrian/bicycle pathway and the railroad. SMART will work with the California PUC and local communities to design the appropriate safety structures consistent with safety requirements and community land use, including school proximity and the use of the SMART pathway by schoolchildren en route to these schools.

The text of Section C.5.3.9, Public Safety: Impacts, has been revised to incorporate reference to the other land uses mentioned in the comment.

## Comment Set A6 City of Larkspur

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### CITY OF LARKSPUR

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Twin Cities Police 415 927-5150  
  
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Web www.ci.larkspur.ca.us

April 23, 2008

BY FAX, EMAIL AND POSTAL MAIL

Lillian Hames  
SMART General Manager  
750 Lindero Street, #200  
San Rafael, CA 94901

Re: Supplemental EIR for SMART, March 2008

Dear Lillian:

The Larkspur City Council is appreciative of its recent meetings with members of the SMART Board. The Council is also looking forward to a cooperative planning effort with the SMART Board, the Transportation Authority of Marin, and the Golden Gate Bridge and Highway Transportation District for the Larkspur Landing Ferry area. However, due to the timing and deadline for comments on the Supplement EIR (SEIR), it is necessary for the City to comment on the adequacy of the SEIR document relative to addressing the project's impacts and responding to the City's October 18, 2008 letter regarding the Notice of Preparation.

In summary, SMART continues to ignore Larkspur's concerns relative to the lack of parking available for or planned for the proposed Larkspur Station and its concerns with the long-range consequences related to housing and traffic within the Larkspur Landing area. Therefore, the City's comments in its October 18, 2008 letter remain the same regarding the SEIR (letter attached).

A6-1

Further, it is clear from the statement on page B-3 (see Section B.2.1 Weekend Service, that "Weekend service could offer rail travel options to people making trips in the SMART corridor for a variety of work and non-work purposes such as day trips to and from San Francisco (via ferry or bus connections, the Sonoma wine country, events in San Rafael, Novato, Santa Rosa, Healdsburg and other towns..."), that no consideration has been given to anyone ever coming from the East Bay going north on SMART or anyone ever driving to the Larkspur Station on the weekend as well as during the week. Where is the analysis of the number of potential riders from the East Bay and the available transit from the East Bay to the Larkspur station?

A6-2

On page C. 3-5, Weekend Parking, it states, "Because ridership would be lower on weekends than weekdays, impacts on parking (e.g. spillovers) would be negligible... Passengers could walk, bicycle, drive, be driven, or take a bus or taxi to the stations on weekends." Again, there is no analysis of the Larkspur terminus station, which has NO parking.

A6-3

400 MAGNOLIA AVENUE, LARKSPUR, CALIFORNIA 94939

Comment Set A6, cont.  
City of Larkspur

Lillian Hames  
April 23, 2008  
Page 2

It is interesting that one of the primary disadvantages identified for the Downtown Novato Station is the lack of parking. The concept plan for the Downtown Novato Station shows a number of on-site spaces for vehicle and shuttle drop-off and pick-up, whereas there is no parking or available on-site parking spaces for vehicle and shuttle drop-off and pick-up at the proposed Larkspur Station.

A6-4

Larkspur looks forward to a cooperative planning effort for the Larkspur Landing area, however, there needs to be a solution identified relative to parking for SMART prior to the construction of the station. Given the lack of available land and funding for parking structures, it is imperative that a solution or potential alternative solutions are identified prior to the creation of a larger, potentially unmanageable, problem. Again, the extension to Larkspur and the ferry terminal should be considered at a later phase of the project. The shuttle service planned for Larkspur could provide a service from the Downtown San Rafael station to the Ferry as well as to the other area job centers planned for shuttle service.

A6-5

With regards to the planned shuttle service, SMART staff previously informed the Larkspur City Council that there would be shuttle buses (i.e., more than one) that would make 30-minute trips to pick-up as well as drop off passengers. At the recent joint meeting with the SMART Board, the Council was told that there would be only one shuttle that would stop at the ferry terminal, San Quentin, College of Marin and Marin General Hospital. It is unlikely that the proposed trip could be made every 30 minutes and will likely discourage riders from taking the train given the additional time added to a commute. This change in the project should be taken into account in the environmental analysis.

A6-6

It is confusing to the City as to why a project that has been presented and marketed as reducing greenhouse emissions would propose to eliminate parking for and possibly endanger the success of the Marin Airporter, which is an successful multi-modal operation that removes hundreds of vehicles from the freeway on a regular basis. The project would displace approximately 200 parking spaces or cars of persons that currently use the Marin Airporter for a project that within the next 20 years is *projected* to serve only 182 round-trip passengers (to and from the Larkspur Ferry Terminal) some of which currently take the bus. These 182 round-trips, which will displace 200 Marin to San Francisco trips, are to be served by the most expensive segment of the SMART rail line at a disproportionate cost of \$18 million for construction of the one-mile rail line link between San Rafael and Larkspur. The addition of the added car trips resulting from the displaced Airporter parking must be taken into account in the environmental analysis of the project.

A6-7

Until the issue of parking and, as noted by Larkspur in earlier letters and in the Larkspur City Council/SMART Board joint meetings, the issue of long-range impacts on housing and land use are analyzed, the environmental studies for the SMART project remain inadequate and deficient relative to CEQA.

A6-8

It was stated at the recent joint meeting that since the SMART Board certified the Draft/Final EIR and there were no legal challenges, the document provides an adequate environmental review of the project other than for the issues addressed in the SEIR. This statement suggests

A6-9

Comment Set A6, cont.  
City of Larkspur

Lillian Hames  
April 23, 2008  
Page 3

that the City may only be able to get its concerns addressed via legal action. However, the City of Larkspur simply wants its concerns adequately addressed and continues to seek a cooperative working relationship with SMART. Therefore, the City continues to look forward to a cooperative planning effort and to a sincere and thoughtful response to its concerns.

A6-9 cont.

Sincerely,



Jean A. Bonander  
City Manager

Attachment

- C: Lorraine Lerman, Community Planner, FTA Region IX
- Larkspur City Council
- Board of Directors, Sonoma Marin Area Rail Transit Authority
- Public Works and Planning Directors
- Supervisor Hal Brown
- Supervisor Steve Kinsey

## Comment Set A6, cont. City of Larkspur

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### CITY OF LARKSPUR

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October 18, 2007

Nina West  
SMART District  
4040 Civic Center Drive, Ste 200  
San Rafael, CA 94903

Re: Notice of Preparation of a Draft Supplemental EIR for the SMART Project

Dear Ms. West:

Thank-you for the opportunity to comment on the Notice of Preparation of a Draft Supplemental Environmental Impact Report (EIR) for the Sonoma-Marín Area Rail Transit Project (SMART). The City of Larkspur has previously expressed its concern with the inadequacy of the previous EIR, and hopes that the proposed Draft Supplemental EIR will correct the deficiencies of the earlier document. Attached, for the record, is a copy of the City's July 17, 2007 letter to Lillian Hames, Executive Director, regarding the City's concerns with the Final for the SMART Project. I also refer you to the City's comment letter on the November 2005 Draft SMART Project EIR printed in the June 2006 Final EIR for the SMART Project (Comment letter #9).

The City's additional comments relating to the Notice of Preparation are included below:

1. **Weekend Service-Parking.** As noted in the City's earlier letters regarding the project, there is insufficient parking available for the existing uses in the Larkspur Landing Circle area, particularly as the Golden Gate Ferry Terminal parking lot frequently reaches capacity. As stated in the Final EIR, **no parking** is planned for the Larkspur Rail Station and the project may reduce existing parking utilized by the Marin Airporter and Golden Gate Ferry passengers. The Final EIR for the SMART Project states that, "access to the station would be by rail, shuttle buses, walk/bike, or drop offs of Golden Gate Transit fixed route bus service." How does SMART intend to enforce only these modes of access to the station, particularly on the weekends when many of these forms of transportation are limited? To assume that persons using the rail to travel north will only access the station by ferry or bus is naïve, at best. How are persons from Oakland and other parts of the East Bay that may wish to travel on the train to Sonoma Country, be able to access the train?

The previous Final EIR further states that SMART will work with the City, adjacent property owners, and GGBHTD to closely monitor illegal parking and would respond with appropriate parking management actions, if warranted. What specifically is intended

A6-10

Comment Set A6, cont.  
City of Larkspur

relative to “closely monitor illegal parking” and “respond with appropriate parking management actions”? These are very vague responses to a serious parking problem that will be exacerbated by the original and expanded project. Parking shortages are known to increase air quality impacts due to resulting traffic congestion, travel of autos looking for parking availability, and decisions to drive when parking cannot be found.

A6-10 cont.

2. **Additional Phase 1 Bicycle/Pedestrian Pathway.** It is unclear from reading the NOP as to what additional bicycle/pedestrian pathway segments may be considered for development in Phase 1 of the SMART project, particularly since an additional \$80 million is proposed for bike/pedestrian pathways – and no funding is proposed for parking at a Larkspur Train Station. The County of Marin in its attempts to plan for a connection between the Cal Park Tunnel and Larkspur Landing Circle has drawn plans which impact circulation, parking and landscaping on privately owned property. The City has concerns that without adequate planning and thorough study of the impacts of the proposed pathways there will be additional circulation, parking and landscaping impacts. Unfortunately, the NOP lacks enough information to allow the City to provide any more specific comments regarding this issue.

A6-11

The Notice of Preparation further requests information regarding applicable permit and environmental requirements of our agency. The comments above and previously submitted express the City’s concerns regarding environmental requirements. In terms of applicable permits, the proposed train station would require Design Review by the City’s Planning Commission and ultimate approval of the City Council. Also, any impacts to private property, as proposed by the Marin County Multi-Use Pathway, may require Planning Commission and City Council approval of amendments to existing Preliminary and Precise Development Plan approvals. Grading, building and encroachment permits would also be required.

A6-12

Once again, the City requests that SMART consider the extension to Larkspur and the ferry terminal as a later phase of the project, which would allow for more time to study alternatives to ensure that the best alternative is selected. It also would allow time to do some “smart” planning to address all issues, particularly parking, which will be a major issue should the project be the success that everyone would hope for should it proceed. You should be aware that as BART’s ridership increased they found the need to build a number of parking garages. It is unrealistic and naïve to assume that only those that take a bus or ferry, and are fit enough to walk from the ferry to the train station, will want to use the train service. The SMART project needs more forward thinking and consideration of the past experience of other local transit agencies.

A6-13

Sincerely,



Robert Sinnott  
Deputy City Manager

Attachment

C: Lorraine Lerman, Community Planner, FTA Region IX  
Larkspur City Council  
Public Works and Planning Directors  
Supervisor Hal Brown  
Supervisor Steve Kinsey

Comment Set A6, cont.  
City of Larkspur

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July 17, 2006

Lillian Hames, Executive Director  
Sonoma Marin Rail Transit Authority  
4040 Civic Center Drive, Suite 200  
San Rafael, CA 94903

Re: Final EIR for the Sonoma-Marín Area Rail Transit Project

Dear Ms Hames:

This letter is in response to the Final Environmental Impact Report for the Sonoma-Marín Area Rail Transit Project, which was received by the City of Larkspur on July 5, 2006. In addition to the City's concerns about the proposed Larkspur Rail Station and the inadequacy of the Draft and Final EIRS, the City has concerns by the Transit District's processing of the environmental document.

First, SMART continues to put the selection of the Larkspur Rail Station location on the City's comments. However, the record clearly shows that the City has had issues with all of the locations that have been presented and has asked for a thorough analysis of each alternative. Response to comment 9-14 states that SMART intends to prepare a Draft EIS at a later date. This would appear to be a piecemeal approach since an EIS would require comparable analyses of the alternatives.

Second, Section 15088.5, Recirculation of an EIR Prior to Certification, of the State CEQA Guidelines, clearly require the recirculation of an EIR when a draft EIR is "fundamentally and basically inadequate" and so "conclusionary in that meaningful public review and comment are precluded." Given the multitude of errors in the draft EIR, which included the need for 21 corrections to the model runs alone, the document must be recirculated for public comment to allow the public time to review the revised information and provide comment. Two weeks' time is not sufficient to allow for an adequate review of the responses and the revised data that has been provided. Therefore, we are unable to fully comment on the responses to the City's comments.

From a cursory review of the Final EIR, it is evident that the majority of our comments either have been inadequately responded to or not responded to at all. For example, response to part of comment 9-2 is that "construction impacts are identified and analyzed in each impact section of the DEIR. The analysis of project impacts includes the impacts associated with a "reverse" rail commute." This statement does not respond to the City's specific concerns regarding construction impacts in the Larkspur Landing Circle area and further responses to other

**Comment Set A6, cont.  
City of Larkspur**

comments regarding construction impacts simply refer to a future construction plan. Given that there is currently a parking shortage in the area as well as poor levels of service, a future plan is not a response to the City's concern. General statements about attempting to obtain other access points and staging areas does not address these concerns. What if these options are not available given CalTrans' own construction projects? The statement in response to "reverse" commutes only says it is addressed but not identify where in the document this analysis occurs.

Comment 9-7 requests that the discussion of travel patterns include a comparison of traffic from Sonoma County to San Rafael to traffic from Sonoma County to San Francisco. The response simply states that the data is in a table in an appendix. The Draft EIR, however, does not discuss or analysis the data. Further, the response to comment 9-10 states a confusion with the City's comment implying that we have referred to "walking from the Ferry to the proposed station," which appears no where in our comment.

These are just a few examples of where the responses are inadequate. Comments from our traffic consultant are attached. Unfortunately, as stated above, inadequate time was provided for a thorough review of the document given the number of corrections that were necessary to the original analysis.

Most importantly, the City once again requests that SMART realistically consider the extension to Larkspur and the ferry terminal as a later phase of the project, which would allow for more time to study the alternatives to ensure that the best alternative is selected. Even SMART needs to acknowledge that an eight minute walk for an average person from the station to the ferry terminal will be much longer and difficult for someone who walks slower, is disabled and/or elderly, particularly given the grade differences that must be crossed both at the station and over East Sir Francis Drake Boulevard. It would be inappropriate to assume that the only ones who may wish to use the rail and ferry transfer are young and fit.

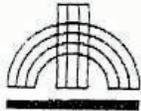
Sincerely,



Jean A. Bonander  
City Manager

C: Lorraine Lerman, Community Planner, FTA Region IX  
Larkspur City Council  
Public Works Director  
Planning Director /

Comment Set A6, cont.  
City of Larkspur



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RECEIVED  
JUL 13 2006

**Memorandum**

To: Nancy Kaufman, Larkspur Planning Department  
From: Bob Harrison  
Date: July 13, 2006  
Re: Review of Sonoma Marin Rail Transit (SMART) Project  
Final Environmental Impact Report (FEIR)

FAX 927-5023  
Page 1 of 2

In response to your request I have conducted a brief review of the June 2006 SMART Project FEIR.

In summary, while most of the major technical errors in the DEIR have been corrected in the FEIR, the conclusions on the effectiveness of the proposed rail service remain the same. According to the FEIR, the SMART project as proposed would have a small marginal advantage over the No Project alternative. The advantage is so minor, however, that, in my opinion, the selection of the rail project would have to be based on criteria other than transportation service.

**Summary of Major Findings**

1 -- The impact of the SMART Project on the operation of the mixed flow lanes on Highway 101 would be minimal. The peak hour traffic volume on Highway 101 projected for 2025 would be the same with or without the SMART project. (Tables 3.6-7 a and b and 3.6-8 a and b).

2 -- The impact of the SMART project on Vehicle Hours of Travel (VHT) show a 0.26% improvement over the No Project Alternative in the AM peak hour and NO improvement over the No Project Alternative in the PM peak hour. (Table 4.2-1)

3 -- The Express Bus alternative shows even less impact on Highway 101 than does the No Project Alternative. (Tables 4.2-2 a and b and 4.2-3 a and b). According to the SMART analysis, the Express Bus Alternative is less effective in removing traffic from Highway 101 than would be the No Project approach. This finding raises concern on the procedures used to study the Express Bus alternative.

4 -- The proposed Larkspur rail station is projected to attract 182 daily passengers. Of these, between 40 and 55 are projected to transfer to the ferry each day. The cost effectiveness of the extension of rail service from San Rafael to Larkspur would appear low based on the use projected for the Larkspur station.

Comment Set A6, cont.  
City of Larkspur

Memorandum to Nancy Kaufman - July 13, 2006

Re: Review of the SMART Project FEIR

Page Two

5 -- The "Larkspur Ferry" station (should be named the Larkspur Landing station) is proposed to be located closer to the Cal Park Hill Tunnel and thus reduce its visual impact, reduce its impact on the Marin Airporter and make use of the pedestrian/bike routes being developed for the Tunnel bicycle route project. The walk from the station to the ferry of about 1,900 feet would make use of the existing pedestrian bridge over E. Sir Francis Drake Boulevard.

6 -- The impact of the SMART Project on traffic operations on E. Sir Francis Drake Boulevard has been revised in the FEIR to show a slight increase in traffic delay due to SMART. According to the FEIR, SMART would have a limited impact, good or bad, on the Larkspur Landing area.

In summary, the FEIR continues to find that the SMART Project would be environmentally superior as compared to the No Project or Express Bus alternatives. However, the advantage of the project in terms of transportation service would be small or none when compared to the other alternatives evaluated in the FEIR.

#### Other Selection Criteria

Rail transit is sometimes selected over other transportation modes because of the beneficial effects it would have on land use or other environmental features. In Larkspur and most of Marin County, there is limited opportunity for the rail transit system to create such an advantage. In Larkspur and San Rafael most of the opportunity to create rail oriented development has been foreclosed by the existing development patterns. At the Marin Civic Center recent development approvals have removed all significant areas of undeveloped land.

The one undeveloped area in Marin where the rail transit service could have been used to foster a modern transit oriented community, the St. Vincents / Silveira properties, has been excluded from the rail service by State law.

The proposed north Marin stations are also constrained by the already established development patterns.

In Sonoma County there continues to exist several opportunities for the rail service to help establish new higher density central city developments. Perhaps the selection of the SMART project could be justified by the positive impact it could have on these Sonoma cities.

## **Responses to Comment Set A6**

### **City of Larkspur**

A6-1 This is a comment on the adequacy of the analysis in SMART's 2006 FEIR and/or 2005 DEIR, rather than on the analysis in the SEIR. The SMART 2006 FEIR was the document that examined impacts on the Larkspur station area as required under CEQA (see especially Master Response R).

That document comprehensively examined the traffic impacts at nearby intersections near all stations. In Larkspur, the analysis examined both the eastbound and westbound traffic conditions at Larkspur Landing and Sir Francis Drake Boulevard, as well at the intersection of Sir Francis Drake Boulevard and the U.S. 101 onramps. It found that the SMART project would have no significant impact of the levels of service (LOS) at these intersections. For details, please see page 3.3-107 in the SMART 2006 EIR.

SMART remains willing to work with Larkspur, private property owners, and other major trip generators (such as Golden Gate Transit) to comprehensively address general parking concerns in the Larkspur Landing area. Comments listed in the City's October 18, 2007 letter are addressed in responses A6-10 through A6-13.

Regarding the comment on the long-range consequences of the project related to housing, it should be noted SMART does not control local land use regulations, or make decisions about housing development in Larkspur. The likely impact of a Larkspur SMART station on housing in the nearby area, would be an increase in property values, as discussed on page 3.2-50 in the 2006 FEIR. Moreover, the presence of a SMART station will not impact Larkspur's Regional Housing Need Allocation (RHNA) under existing ABAG policy, a fact verified with ABAG officials.

A6-2 It is possible that SMART riders could arrive from the East Bay, either by driving or by transit, but this does not represent a substantial percentage of the overall ridership. Pages C.3-3 and C.3-4 of the DSEIR refer to GGT Routes 40 and 42, which travel between the San Rafael Transit center and the El Cerrito del Norte BART station, via the Richmond-San Rafael Bridge. Route 42 also serves the Richmond BART/Amtrak intermodal station. It is noted that there is parking available at the Larkspur Ferry terminal on weekends; and the volume of this traffic (driving from the East Bay to Larkspur to ride SMART) on weekends is expected to be very small. Also, it should be noted that transit travel times from the East Bay are not likely to be very competitive with driving from the East Bay, so this is not a substantial factor in projecting ridership. (The SEIR transportation consultant made a sample transit trip from downtown Oakland to Terra Linda which took approximately three times as long as the driving time.)

A6-3 There is parking available on weekends at the Larkspur Ferry terminal, which is within walking distance from the station.

A6-4 A shuttle or drop off location at Larkspur was shown in the 2006 FEIR on page 4-21. The Larkspur station is physically constrained, as is the downtown Novato site, and the site plans make the best use of the available land.

A6-5 This is a comment on the project analyzed in the 2006 FEIR and is not a comment on the adequacy of the DSEIR's environmental analysis. In 2003 SMART staff presented a parking structure alternative with rail station to the Larkspur City Council and it was not accepted. See Master Response R in the 2006 FEIR. SMART remains willing to participate in the City's new undertakings to address parking issues in the future. Since 2004, the project has been defined by the

SMART Board of Directors as Cloverdale to Larkspur (see page 2-11, 2005 DEIR). A connection to the regional ferry system is a key linkage for passenger rail service.

The nine shuttles proposed in the 2005 DEIR serve individual rail stations. The shuttle serving Larkspur would serve San Quentin, Marin General, College of Marin and other destinations along its route. The Larkspur Station shuttle would not serve the San Rafael Station as the connection between downtown San Rafael and the ferry terminal would be the rail corridor. The San Rafael Station also has shuttle service linking that station to employment areas along West and East Francisco Boulevard, as well as the Canal District.

- A6-6 The provision of shuttle buses to serve weekday rail passengers was evaluated in the 2006 FEIR; no changes have been proposed with respect to shuttle services. The FEIR included information on one shuttle bus serving the Larkspur Station with multiple stops at San Quentin, College of Marin, and Marin General Hospital. A more detailed shuttle service plan will be developed in concert with a shuttle provider prior to startup of service.
- A6-7 This is a comment on the original project analyzed in the 2006 FEIR and is not a comment on the adequacy of the DSEIR. The effect of the SMART project on the Marin Airporter was considered in the FEIR (see Master Response R). The comparison between the number of Airporter trips with and without the SMART project is not correctly calculated in the comment, since it assumes that the parking lot is always full, and that every vehicle parks for only a day, then leaves so that another vehicle can park. In reality, the average length of stay for this type of operation is usually four or five days.
- A6-8 See response A6-1.
- A6-9 Comment noted. This is not a comment on the adequacy of the DSEIR's environmental analysis; see Master Response 1 regarding the 2006 FEIR. SMART concurs in the desire to develop and maintain a cooperative working relationship with the City of Larkspur.
- A6-10 Both visual inspections and conversations with GGT planning staff have indicated that there is sufficient parking available at the Larkspur Ferry terminal parking lot on weekends, which is the subject of this SEIR. SMART patrons could park there and use the footbridge over Sir Francis Drake to access the station. The California Vehicle Code permits local agencies to ticket or remove a vehicle that parks unauthorized on private property. Parking enforcement would presumably continue as it does today. See Master Response R in the 2006 FEIR. SMART would provide information to station users indicating that vehicles unlawfully parked at either local businesses or the ferry terminal may be ticketed or removed. In addition, SMART will work with Larkspur, Golden Gate Transit and the Transportation Authority of Marin to develop long term parking strategies for this area.
- A6-11 The additional Phase 1 bicycle/pedestrian pathway segments described in the NOP were not included in the Draft SEIR. See Draft SEIR Section A.2.3.
- A6-12 This comment does not pertain to project components studied in the Draft SEIR. Permit requirements for the overall project, including original proposed stations, are outlined in the 2005 DEIR Section 2.10.
- A6-13 This is a comment on the project analyzed in the 2006 FEIR and is not a comment on the adequacy of the DSEIR's environmental analysis. See response A6-5 regarding Larkspur parking planning efforts and original parking proposals presented to Larkspur. The Larkspur Ferry shuttle will also service the Larkspur Ferry for those individuals who cannot, or choose not to, walk between the two facilities.

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Comment Set B1  
Sierra Club, Marin Group



**SIERRA  
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FOUNDED 1892

Sierra Club Marin Group  
P.O. Box 3058, San Rafael, CA 94912  
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Lillian Hames  
SMART General Manager  
750 Lindero Street, #200  
San Rafael, CA 94901

Re: SMART Draft Supplemental Environmental Impact Report Comments

April 9, 2008

Dear Ms. Hames and SMART Board of Directors:

The Sierra Club Marin Group appreciates the opportunity to comment on the Sonoma Marin Area Rail Transit Draft Supplemental Environmental Impact Report (DSEIR). The Marin Group finds there are issues which remain unanswered in this report. The Sierra Club Marin Group's position regarding the project has not yet been defined. We ask our questions and make comments for clarification of the impacts and to have a more comprehensive understanding of the project as described in the DSEIR. We are looking forward to having additional analysis to answer remaining outstanding issues related to the project discussed in the DSEIR.

Executive Summary

1. Page ES-5, points ES.4 and ES.5: The DSEIR points out only one primary area of known controversy regarding the SMART project. We disagree with this conclusion. There are many other major areas of controversy still unresolved. There are concerns about traffic and parking in Larkspur; congestion in downtown San Rafael; no parking for southern Marin residents; inadequate shuttle service for Marin residents to get to the stations in Larkspur and Downtown San Rafael; freight operating at night since passenger service controls dispatch and will run during the day; uncertainty about funding; growth inducement; etc. The section, ES.4 must be expanded to contain more of the known areas of controversy and include discussion of the unresolved issues.

B1-1

Project Description

2. Page B-4: There is a discussion of the Siemens "Desiro" light DMU's length, speed and capacity, but no description of the Bombardier's "Talent" light DMU's length, speed and capacity. Please include this information as well, so we can obtain a true comparison of these two light DMU's. Also, what is the difference in weight between the heavy DMU and light DMU's?
3. Page B - 4 and 5: Passenger capacity is "generally 130 seats" for the Desiro light DMU without taking into account the interior configuration. Approximately, what would be the number of seats remaining if a bathroom, storage for 10 to 20 bikes, and handicap and wheel chair accommodations

B1-2

B1-3

Comment Set B1, cont.  
Sierra Club, Marin Group

were included within the train? How much space would these occupy? How many seats would remain when these improvements are included?

B1-3 cont.

4. Page B- 20 and 21: Please clarify: SMART plans to operate its service to Cloverdale north of the Healdsburg. NCRA is subordinate to SMART south of Healdsburg. Does NCRA control the easement between Healdsburg and Cloverdale? If so, is SMART subordinate to NCRA in this section of the track? How could this affect the Smart/NCRA Operating Agreement and control of dispatch between Cloverdale and Healdsburg if SMART is subordinate to NCRA between Healdsburg and Cloverdale?

B1-4

5. Page B-23: The DSEIR states it is highly unlikely the NCRA could open the entire NWP line (including both the Eel River diversion and North End diversion). Does NCRA or NWP agree with this statement, that these future operations are highly unlikely? Documented information shows the NCRA's future plans are to operate freight service from Humboldt Bay, through the Eel River Canyon, down through Cloverdale and Novato, all the way to Lombard.

B1-5

6. NCRA is in the process of producing its own DEIR. When NCR's EIR is complete, will SMART need to revise its own analysis to adopt to NCRA's own EIR conclusions?

B1-6

7. Page B-23: If midday passenger service is not feasible, because the FRA's requirement when using light DMU's is to provide a dedicated "window" for daytime freight service operations, how will this affect SMART's passenger ridership, schedules, revenue, etc? Would the benefits associated with the SMART's proposed project need to be recalculated?

B1-7

Regional Setting and Study Methods

8. Page C.2.5: Updated baseline information from EMFAC 2007 indicates the benefits achieved by SMART'S project by taking cars off the road may not be as large as identified in the 2006 FEIR. The DSEIR states these updated baseline changes do not warrant revisiting the analysis of the proposed project with new information. The DSEIR says this is because the project's effects with respect to other regional pollutants are beneficial and emissions such as NOx would continue to remain less than significant. How can the DSEIR come to this conclusion without any specific study? There is no analysis, other than mere subjection in these statements. SMART proposes to use a new type of Ultra Low Sulfur Fuel (ULSF). The 2006 DEIR and FEIR discussed SMART's use of biodiesel fuel. There is no longer a mention of the use of biodiesel fuel in the DSEIR. Biodiesel fuel was considered as an important means to emit less greenhouse gases than standard biodiesel fueled engines in SMART's FEIR (page 4-37). How does the ULSF compare to biodiesel fuel in the reduction of greenhouse gases in SMART's heavy and/or light DMU's? Please include updated information including a study of the NOx emissions using new baseline information to show how the DSEIR has arrived at its conclusions. Also, include a discussion of the reduction of greenhouse gases and toxic emissions of diesel particulate matter from biodiesel fuel verses ULSF.

B1-8

Comment Set B1, cont.  
Sierra Club, Marin Group

9. Throughout the DSEIR, as well as the previous DEIR, FEIR, there is mention of "peak period" trips. What is SMART's "definition" of peak period trips? This is not described in any of SMART's EIR documents. This information would be helpful in understanding the EIR analysis and its continued reference to SMART's operations in the DSEIR about peak period operations. Do the SMART EIR documents use MTC's latest standard of four hour windows of 6 – 10 AM and 3 – 7 PM for their peak period time slot (MTC's Transportation 2035: Change in Motion document, page 147), or does SMART have its own definition for what are their peak periods? Please clarify.

B1-9

Weekend Passenger Rail Service

10. C3-2 and 3-3: Weekend traffic conditions for the DSEIR were performed on only one fall day, Saturday, October 6, 2007. Is it a truly valid method to determine traffic volumes and congestion in a major corridor by having information collected on only one day? Would a more accurate measure of congestion be established by monitoring weekend traffic over several different Saturday and Sunday's and several different months? Is a traffic study truly credible when on the one day studied, the traffic counting sensors were disabled in Central San Rafael? How can a study be valid when no traffic study was performed on a Sunday as well as only one Saturday to determine weekend traffic congestion levels? In order for this study to be reliable the weekend traffic volumes and congestion in this major corridor must be redone in order to obtain accurate information to adequately compare and understand the SMART corridor and its environmental impacts such as pollutant emissions.

B1-10

11. C.3-5: If no shuttles are scheduled to operate on weekends, and if public weekend transit service is limited, how will residents and tourists get to the train stations as well as their shopping, social and tourist destinations? Is it valid to presume people will easily be able to ride the weekend trains if they are severely hampered by limited public transit to and from the stations or restricted ability to use autos and park at several key train stations? How has the lack of connectivity been reflected in the ridership numbers and total energy consumption and greenhouse gas emissions?

B1-11

12. C.3-9: Would GGTD, MCTD or SCTD weekend bus schedules coordinate in a timely manner with weekend train service without negatively affecting local weekend bus routes?

B1-12

13. C.3-5: Would a family pay for a taxi to get to and from a train and then pay an additional family fare for a train ride? Would the total cost of the family's trip be less by merely driving in their own vehicle to their destination? The example of passengers paying for taxis to arrive at a station and then to pay to ride the train in the DSEIR should be deleted as it is unrealistic.

B1-13

14. On page C.3-6 it presumes 2,020 rail trips would be made on a Saturday. Is this 1,010 passengers each way? How many riders would ride the trains on a Saturday and on a Sunday from point A to point B? What times of the day would have the highest and lowest number of riders from point A to point B.? There has been no ridership study or survey to show how many tourists and/or residents would use the train on the weekends. The DSEIR's

B1-14

Comment Set B1, cont.  
Sierra Club, Marin Group

conclusion is based primarily on assumptions. Other than comparing the SMART service primarily to the Capitol Corridor rail service, which is technically in intercity train (different than the SMART corridor), to reach the Saturday weekend ridership number is inadequate. There was no other study performed. In the 2006 DEIR actual ridership numbers were studied in the Travel Demand Forecasting Report detailing where a specific number of people would board and alight from the train at specific stations along the entire length of the SMART line. This portrayed a more factual method of determining ridership numbers. We are unable to find any such study or analysis in the DSEIR showing how the ridership conclusions were reached other than from looking at other rail services and merely deducing a percentage number from other rail operations.

B1-14 cont.

15. C.3-6: Would the projected total of 2,020 ridership be cost-effective for SMART to run a weekend service? Is SMART's weekend service, which it states on page C3-9 is more likely to appeal to tourists than residents, be a cost effective use for Marin and Sonoma tax payers' dollars? How will climate and time of year impact tourist revenue? This discussion should be included in SMART's financial analysis.

B1-15

16. C.3-13: Are the estimates of direct and indirect annual energy consumption for transit bus and passenger vehicles estimated presuming the passenger rail cars are filled to capacity? The analysis is incomplete as to how many automobile users have been diverted from the highway since we have no quantified information regarding the number of people riding the weekend trains. The ridership assumptions in the DSEIR are based primarily on a comparison with the Capitol Corridor commuter rail services weekend service. Without the DSEIR completing a more in-depth Travel Demand Forecasting Study of weekend service in the SMART project area, it is unclear how the DSEIR is able to correctly compare weekend passenger service to the number of vehicle miles traveled (VMT) in relation to overall net energy reduction with rail service. How can the estimates of comparing energy consumption in Table C.3-8, page C.3-13, of passenger vehicles, transit buses, and passenger rail be valid without also knowing a more accurate number for the passengers the weekend train will rationally take off the highway. If the trains only run one quarter to one half full, what would be the VMT relation to direct and indirect energy use? Please include a more comprehensive study and analysis to validate the DSEIR's conclusions about energy saved from diverting auto trips to rail service.

B1-16

Alternative Train Vehicles – Light DMU's

17. C.4-1 through C.4-3: In comparison to the 2006 EIR information regarding emissions levels as well as energy use, the DSEIR does not distinguish between the biodiesel fuel standards for the heavy DMU versus the light DMU. How do the light DMU's compare in energy and pollutant levels to the bio diesel heavy DMU? This comparison is missing from the DSEIR. Please include.

B1-17

18. C, 4-4: What are the vibration impacts to residents along the track? The DSEIR only discusses noise impacts, but fails to mention vibration impacts in this section.

B1-18

Comment Set B1, cont.  
Sierra Club, Marin Group

19. The DSEIR fails to discuss the noise and vibration impacts to riders traveling inside the light DMU. What would be the difference between the light and heavy DMU's passenger experience in regards to noise and vibration? This is not discussed in the DSEIR. B1-19
20. Will the light DMU be as easy to enter and exit the passenger car as the heavy DMU? The heavy DMU was said to be lower to the ground and station platform so bicycles, passengers and handicap passengers would have easy and quick access to the vehicles. Please explain. B1-20
21. The light DMU is proposed to use new ultra low sulfur fuel (ULSF). Will there be a cost savings or cost increases to SMART from using ULSF versus standard diesel fuel? Do heavy and/or light DMU's obtain the same fuel economy and efficiency using standard diesel fuel, ULSF or biodiesel fuel? When projecting SMART's financial analysis, this information should be included regarding the difference in cost of using different fuels? With the cost and availability of fuels continuing to sharply escalate, this is an important consideration for the long term financial viability of SMART. B1-21
22. The DSEIR fails to discuss the maintenance requirements of the light DMU. Would the maintenance requirements be the same for the light DMU as the heavy DMU? This was discussed regarding the heavy DMU in the 2006 EIR. Would an engine using ULDF require more maintenance than one using standard diesel or biodiesel fuel? Where would the light DMU's be maintained? Would all the maintenance be performed in Cloverdale? What is the availability of parts for the light DMU? Are the parts for the light DMU coming from Europe, since the light rail trains under consideration are primarily European in origin? Would the trains need to be taken off-site for servicing? If so, how will they be transported and how far? Are the costs associated with maintaining the light DMU the same as the heavy DMU? Are the fuel costs for operating the light DMU the same as the heavy DMU? Please include this information in a cost comparison in the financial analysis. B1-22
23. There is no discussion in section C.4 in regards to the FRA requirements for the differing time separation standards of a light DMU versus heavy DMU in relation to operation on the same single track with freight trains. Please include this information. Also, what are the steps required to achieve FRA approval in order to use light DMU's versus heavy DMU's on the same single track with freight operations? How long does it take to obtain such a FRA approval? What are the chances, in percentage, the FRA will grant the use of light DMU's versus heavy DMU on the SMART right-of-way? How many times has the FRA allowed light DMU's to share the same single track with an operational freight service? B1-23
24. SMART plans to begin operations with a limited startup operation schedule. (See page 2-9, section 2.4.4 reference to start up service in SMART's DEIR) NCRA's freight service also plans to begin freight operations with a somewhat limited operation schedule, particularly in its first year of operations. Over time, both the NCRA and SMART plan to expand their services. If SMART, as claimed, has control over dispatch of the freight B1-24

Comment Set B1, cont.  
Sierra Club, Marin Group

operations and SMART expands its service schedule using a light DMU in the future, what would happen to freight's schedule if they too expand their operations? When using a light DMU, the required window for time separation by the FRA is most likely to be a much greater separation than the 30 minute lead time for a heavy DMU. Would freight be able to continue to operate in off-peak times during the day? Would freight service be pushed into operating during more evening and night time hours? If both freight and SMART light rail DMU service expand, how will this affect the operations on the same single track? If substantial time separation is required between freight and light DMU trains, how will this requirement impact the future ability for SMART to expand its service? What would need to be arranged regarding scheduling of freight and light DMU passenger service if and when either one or the other services expand? How would they meet the FRA requirements for specific time separation?

B1-24 cont.

25. Please evaluate the impacts of expanded schedules of both light DMU and freight service in regards to noise, vibration, safety, scheduling, etc. The DSEIR fails to evaluate the cumulative impacts to the light DMU service with scheduled expansions planned for both freight and passenger service. With the increased window of time separation by the FRA, the impacts from expanded light DMU passenger service will be different then the impacts from a startup light DMU passenger and freight service.

B1-25

Novato South Station Alternatives

26. C.5.-39, Impact BR 8 (Oaks): The DSEIR mentions at the Hamilton station, potentially 15 large oak trees might be removed as a result of clearing the land for development of the station. A 3 to 1 ratio for replanting is a mitigation measure required for the removal of oak trees. Is it possible, to preserve and move the exiting large oak trees to another location at the same station site and used for screening the station from residents on Marblehead Lane and Chapel Hill Road? This would be a way to preserve the trees on-site. Will these trees be removed during times when birds are not nesting?

B1-26

27. C.5-42 & 43, C.5.3.7, Setting: The Hamilton site is crossed by transmission lines and has several transmission towers along the perimeter. In order to improve the visual quality of the area and reduce the number of exposed transmission lines, would SMART consider under grounding these lines at the same time they'd be installing the Hamilton station and its utilities? Would this be a benefit as well as mitigate some of the impacts of the station and rail line to the adjacent school, athletic field and nearby residents?

B1-27

28. C.5-45, Impact V-2: There is only a discussion in the DSEIR of the new sources of lighting at night from the station and parking lot. During winter months would there also be early-morning light shining from the station, parking lots, as well as vehicle's lights in the parking lots? How could this be mitigated?

B1-28

29. C.5-60, Table V.5-6: There are projected to be between 220 - 250 riders boarding at the Hamilton station. How many of these riders will ride North to Sonoma or South toward Larkspur? What percent of riders, at this station, will be from residents residing in the neighboring area or from commuters to

B1-29

Comment Set B1, cont.  
Sierra Club, Marin Group

jobs in the surrounding area? This is not explained in Table C.5-6. The table merely "lumps" the number of all boarding passengers together. The 2006 DEIR included a Travel Demand Forecasting Report which portrayed a more accurate analysis regarding the number of passengers boarding and alighting at a station. The DSEIR should include this same type of analysis in order to understand and compare the Novato South Alternatives.

B1-29 cont.

30. C.5-33: The Hamilton station alternatives are said to be somewhat removed from the nearest freeway interchange and from Highway 101. The DSEIR states it is assumed the Hamilton station location is not to be under consideration for a potential Novato bus transfer center for Marin County Transit. What are the pros and cons regarding connectivity to other public transit if the Hamilton Station is not located at the same site as the Marin County Transit's proposed northern transit hub?

B1-30

31. C.5: Would it be possible to have a Novato North, a Downtown Novato plus a Hamilton station in Novato? Would 3 Novato stations be more convenient and induce the opportunity for more riders in Novato to use the SMART commuter train? How would three stations in Novato affect SMART's schedule and ridership numbers?

B1-31

Revised Cumulative Impacts

32. C.6-2: SMART's heavy DMU passenger train time separation between freight trains may be no closer than 30 minutes behind their leaders. Is this 30 minute separation requirement the same when using heavy and/or light DMU's? If this 30 minute time separation is only for heavy DMU's, what would be the amount of time separation required between light DMU's and freight? The DSEIR only discusses one potential alternative for light DMU's; a time separation using Positive Train Control (PTC). What would another alternative for light DMU's then using PTC with freight sharing the same single track? What would be the required amount of time separation with or without use of PTC?

B1-32

33. C.6-2 and 3: FRA currently has not approved the use of light DMU passenger service on the same single track as freight service using PTC (Positive Train Control). When might FRA make such an approval? What is the chance, in percent, PTC will be approved and for allow light DMU's to share the same single track with freight service? If the chances for approval by the FRA is in the distant future or of low probability, should SMART realistically be considering using light DMU's for its passenger service? If SMART initially purchases heavy DMU's to start up its service and later on decides to change train cars and purchase light DMU's, what changes would be required to SMART's schedules, tracks, signaling, etc. and its relation to freight service. Please have the financial analysis include the cost of SMART first purchasing heavy DMU's and then later on, when changing to light DMU's, the new additional capital costs to make this change. Would it be cost-effective for SMART to purchase two different sets of (heavy and light) DMU's over a 10 to 20 year period?

B1-33

34. C.6-2 and C.6.5.2: Hours of Freight Operation and System Capacity: SMART's current peak hour schedule is actually the basis for SMART's

B1-34

Comment Set B1, cont.  
Sierra Club, Marin Group

startup schedule of operations. (On page 2-9, 2.4.4 of the DEIR it mentions this is SMART's start up schedule for operations.) After a few years of operations SMART has publicly stated it hopes to be able to expand its hours of operation and scheduling to increase its ridership. How would this expanded schedule and hours of operation impact SMART in relation to start up and expanded freight operations? Please discuss this in relation to freight startup service as well as potential expanded freight service and expanded SMART passenger service.

B1-34 cont.

35. C.6-3: Freight Service Track Repairs: Would NCRA's track and bridge repairs between Cloverdale and Highway 37 meet the level of standard required for SMART's passenger trains? If not, would SMART need to redo and/or upgrade the track and bridge repairs made by NCRA? If NCRA decides not proceed with its track repairs and freight operations, would SMART need to pay the entire cost for upgrading the tracks from Healdsburg to Highway 37? Has SMART's financial plan factored in SMART paying the entire cost of upgrading the tracks and bridges without the financial assistance of NCRA's project? When preparing SMART's financial analysis, include the cost savings or expense to SMART regarding the coordination of costs of track and bridge repair between SMART and NCRA.

B1-35

36. Would light DMU's require a different level of track improvements and a higher or lower quality of track then required for heavy DMU's?

B1-36

37. C.6-3: Would increased level of freight service, due to the heavier weight of freight cars than passenger cars on the same single track, cause the tracks quality to deteriorate at a faster rate? Would this require more maintenance by SMART in order for SMART to maintain its faster train speeds for its light DMU passenger service than is required for freight service? Would a heavy DMU be more "forgiving" during its operations along a deteriorating tracks condition than a light DMU?

B1-37

38. C.6-3: Freight Sidings: NCRA has indicated in their letter to SMART dated November 27, 2007, page 4, number 13, the location of four new freight sidings. Would any of these sidings interfere with the bicycle/pedestrian paths that SMART plans to construct parallel to their tracks? If so, what might be the impacts of these sidings to the bicycle/pedestrian paths?

B1-38

39. C.6-5 and 6: The DSEIR mentions the length of time a freight train would take to cross an intersection is dependent on the speed and length of the train. It states a 60 car freight train could take up to three minutes to pass through an intersection? What is the total length of a 60 car freight train including engine and caboose? In Ap. 2-5 it states that each freight car is 67'7" and a locomotive is 62'6". This means a 60 car freight train would be approximately 4,118 feet long. Would a train of this length extend across more than one intersection at one time when analyzing the various crossings between Cloverdale and Highway 37? What is the length of a 40 car train? Is this about 2800 feet long? Is the average city block between about 264 feet (New York City) to about 500 feet (World Trade Reference)? If so, which intersections and how many would be impacted by a 60 or 40 car length train? Provide information detailing the locations where more than one

B1-39

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intersection would be simultaneously blocked and for what period of time if a train is traveling about 20 -25 mph. How would this affect the cumulative impacts between freight and passenger service? How might this impact the ability for emergency vehicles and/or the public to cross tracks if more than one intersection is blocked during the same period in times of emergency?

B1-39 cont.

40. C.6-7, C.6.2.2: Both Speculative Scenario One and Two discuss cumulative impacts between SMART and freight as only freight service expands. Please also include a discussion of cumulative impacts of freight, as it increases its frequency of use along with the increase of SMART's passenger service beyond its currently proposed startup level of service. (Page 2 - 9, 2.4.4, of SMART's DEIR stated this was SMART's startup service.) How would this cumulatively impact vehicle delays at crossings? How might this affect the scheduling of freight trains along with passenger train service?

B1-40

41. C.6-13 and 14: Freight service which travels at speeds greater than 25 mph would have noise that exceeds 60dBA Ldn at 50 feet. If SMART expands its service or chooses to use light DMU's, (which could cause freight to operate in early morning, late evening or night time), the noise and vibration impacts to homes and other facilities along the railroad right-of-way will have significant cumulative impacts. Would a 60dBA, noise spike of two minutes, when people are sleeping, have a greater impact than daytime noise? What would be the long-term cumulative impacts on people living close to the tracks from the continued nightly disruption of their sleep? Would this sleep disruption in the evening and/or night occur if freight trains were not forced to run at evening and/or night times, since passenger trains have priority to run during the day?

B1-41

42. C.6-15 and C.6-6: This section discusses vibration. On page C.6-15, it says a 60 car freight train will take less than two minutes to pass at 25 mph. On page C.6-6, it states it could cause a delay from 87 seconds to slightly more than three minutes. Thus, there is a difference of approximately one minute of delay between these two references. Please clarify the difference between the two references. Which delay time is accurate?

B1-42

43. C.6.18: The DSEIR states midday trains, if the light DMU is selected to run along with freight service on the same single track, might be eliminated due to the FRA's requirement for strict time separation. How would elimination of the midday train affect SMART's projected ridership numbers? What was SMART's purpose for having a midday train? Who will be affected by the elimination of the midday train? When developing SMART's financial analysis, discuss the changes of ridership and financial implications to SMART from the elimination of the weekday midday train service.

B1-43

Project Alternatives

44. D.2: Bus Service: The DSEIR concludes that the weekend rail passenger service will offer an environmental advantage over express bus service on the weekends. How did the DSEIR reached this conclusion? This conclusion appears to be mere assumption. If the bus service is not discontinued, is not the weekend SMART service just an added source of energy consumption and greenhouse gas emissions? Is SMART proposing that the Route 80 bus

B1-44

Comment Set B1, cont.  
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be discontinued? There is no information given in the DSEIR regarding Golden Gate Bridge and Transit District's weekend bus service. Route 80 runs every day, including weekends, from Santa Rosa to San Francisco. Golden Gate Transit states it takes the same amount of time on the weekends to travel from Santa Rosa to San Francisco by bus as it does the express bus which runs on weekdays. How many buses run on the weekend in the same corridor as the proposed weekend rail service? The weekend rail service will not offer any connecting shuttle service to the train. Would the weekend train service connect in a timely manner with the weekend ferry and/or public bus service? Compare Route 80 bus from Santa Rosa to San Francisco, to the train plus its other required modes of transportation on weekends. The comparison should include the length of travel time and convenience. Also, evaluate weekend trains required connecting service verses Route 80 bus direct service from San Francisco to Santa Rosa. Compare this for both Saturday and Sunday weekend service. What would be the ridership numbers for weekend rail versus weekend bus service between Santa Rosa and San Francisco? Would people be able to reach their final San Francisco or Santa Rosa destination more readily by rail versus bus on the weekends? Please give information used by the DSEIR to reach its conclusion that passenger rail would offer environmental advantage over weekend bus service. Evaluate this including the analysis that both bus and train are operated using diesel-electric hybrid technology.

B1-44 cont.

45. D-2: The DSEIR states "passenger rail service would continue to offer environmental advantages over bus service in these same issue areas,...lower energy uses and emissions... Utilizing light DMU's would further increase environmental advantages due to better fuel efficiency, fewer emissions and reduced greenhouse gases." Golden Gate Bus will implement, in December 2008, new bus service using fuel cell-battery hybrid buses. MTC is currently assisting bus transit agencies to purchase alternative fuel buses, such as diesel-electric hybrid buses and other types of buses using zero emission technologies. San Mateo Transit District is currently running three zero emission buses. Golden Gate Transit has acknowledged they could operate their express buses as well as regular bus service using new technologies. Would these changes to new clean air buses alter the conclusion that rail service is superior to bus or express bus service over the 20 year period of a light or heavy DMU dependent on using ULSF or engines changing to use diesel – electric hybrid technology?

B1-45

Thank you for allowing the Sierra Club Marin Group to share our questions and comments regarding SMART's Draft Supplemental Environmental Impact Report. We look forward to hearing the FSEIR responses.

Yours truly,



Karen Nygren  
Sierra Club Marin Group Transportation Chair

## Responses to Comment Set B1 Sierra Club, Marin Group (Karen Nygren)

B1-1 The areas of controversy outlined in the Draft SEIR pertain to project components studied in the SEIR. It is not necessary to revisit other issues identified and adequately analyzed in the 2005 DEIR and 2006 FEIR. The issue of nighttime freight operations is fully addressed in the SEIR. It should be noted that, contrary to the comment, the Draft SEIR determined that the proposed level of freight service could be accommodated during daytime hours.

B1-2 The Bombardier Talent vehicle, currently operating in Ottawa, Canada has a length of 160 feet, a top speed of approximately 90 mph (although speeds would not exceed 79 mph on the SMART rail line), and a seating capacity of 135 with room for 150 standees.

The Colorado Railcar “heavy” single-level DMU weighs about 0.9 tons per seat. The Siemens and Bombardier “light” DMU vehicles weigh about 0.6 tons per seat.

The purpose of the SEIR is to provide sufficient information to allow a reasonable analysis of the likely environmental effects of using light DMU vehicles. The Siemens Desiro vehicle is an example of a light DMU vehicle type, and has many similar characteristics to the Bombardier Talent. It should be noted that rail vehicles are generally produced according to the specifications of the organization making the order. In other words, the dimensions and other specifications of an existing, operating vehicle should not be viewed as fixed and unchangeable. By the time a request for bids is issued, there may be new vehicles that are still on the drawing boards that may be worth considering. The ultimate vehicle selection will be made by the SMART Board and would be based on, among other things, public input, bid prices and operating characteristics, including operating cost.

B1-3 The Siemens Desiro vehicle being operated by North County Transit District (NCTD) in San Diego (the “Sprinter”) has a seating capacity of 136 seats. Vehicles are furnished with a large “multi-purpose area” where transverse seats are positioned along each side of the train facing the opposite window. These seats fold-up automatically when not in use. In the case of the Sprinter, there are 6 of these types of seats on either side. This multi-purpose area can be used by those with luggage, those in wheelchairs, and those with bicycles. Vehicles will also be equipped with restrooms, as was noted in the response to comments in the 2006 FEIR. The presence of this amenity would likely require a reduction of seating capacity by about 12 seats, resulting in an overall capacity of about 124 seats.



According to the NCTD in San Diego, each multi-purpose area can accommodate about eight bicycles. For a two-car train set, this would suggest maximum capacity for 16 bikes. Accommodating more bicycles could be accomplished through reconfiguration and would slightly reduce seating capacity. Overall, the precise configuration will be determined in the final planning stage of the project. The exact details of the interior design are not necessary to provide an adequate CEQA analysis.

- B1-4 As described in the 2005 DEIR, SMART has an easement for the purpose of operating passenger commute train service on NCRA owned right-of-way from Healdsburg (MP 68.2) to Cloverdale (MP 85.4). Once SMART is operating trains, it is anticipated that train dispatching will be controlled system wide (Larkspur to Cloverdale) by SMART. See also response A1-3.
- B1-5 NCRA and NWP Co. both commented on the Draft SEIR and did not dispute statements in the DSEIR regarding future speculative service levels. See Draft SEIR Section B.3 regarding the basis for determining these scenarios speculative. Also, see Master Response 2.
- B1-6 It is not anticipated that SMART will need to revise the analysis presented in the DSEIR and FSEIR in response to NCRA's EIR. See Master Response 2. There is no requirement to "adopt" NCRA's EIR conclusions.
- B1-7 If the midday train were eliminated in the event that freight trains are operating in the SMART corridor and light DMUs are the selected SMART vehicle, the reduction in ridership and revenues would not be significant. This is because the ridership on the mid-day train is modest (three percent of daily ridership), so the reduction in ridership/revenue would be equally modest. The benefits of the SMART project would not be significantly affected.
- B1-8 The 2006 FEIR Tables 3.5-7 and 3.5-8 showed the emission reductions of taking cars off the road along with the emission increases caused by the heavy DMUs. These tables show that the increases caused by the heavy DMUs would be less than significant after implementing NOx control technologies (environmental compliance measures) previously committed to by SMART. These emissions would be less than significant even without considering the reductions associated with taking cars off the road. In the DSEIR, the conclusion in the 2006 FEIR is not changed.

As noted on page C.2-5 of the DSEIR, the baseline forecasts of the 2025 motor vehicle traffic emissions were reviewed for the DSEIR, but revising the baseline of the 2006 FEIR is not required to prepare the supplemental analysis. Reducing the study area traffic (and thereby reducing VMT) would still reduce NOx, regardless of the model used to estimate the reductions. Previous estimates showed a reduction of 50 pounds per day NOx (lb/day) in the Bay Area Air Basin (2006 FEIR Table 3.5-7) and a reduction of 17 lb/day in the North Coast Air Basin (2006 FEIR Table 3.5-8). Based on current information in EMFAC2007, these reductions would be about 35 lb/day in the Bay Area and 12 in the North Coast. As future updates to the EMFAC models occur, these estimates could change over time. In any case, the heavy DMUs analyzed in 2006 would cause less than significant increases with environmental compliance measures proposed as part of the project. The 2006 FEIR shows that NOx emissions from the DMUs can be reduced by 80 to 85 percent with the environmental compliance measures.

Ultra low sulfur diesel fuel has been a requirement statewide since 2006, and this would not change any aspect of the project analyzed in 2006. The 2005 DEIR and 2006 FEIR showed that bio-diesel would cause slightly higher (additional two percent) emissions from the DMUs when compared to diesel. SMART continues to contemplate use of bio-diesel as reliable supplies emerge. This should occur in compliance with the Governor's Executive Order S-1-07, the Low Carbon Fuel Standard (LCFS) of January 18, 2007. This order calls for a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. The California Environmental Protection Agency is required to coordinate activities to meet the 2020 target. CalEPA would need to consider the emissions consequences of using fuels under the LCFS or emerging bio-diesel specifications.

- B1-9 The use of the term “peak period” was extensively explained in the 2005 DEIR (see, e.g., Section 3.6.2) and in the 2006 FEIR (see, e.g., Master Responses C and E). The peak period is the time of day, usually once in the morning and once in the late afternoon/early evening, when the highest percentage of weekday trips is made. For most trips, this occurs between 7-9 AM and 4-6 PM. However, the starting and ending time of the peak period may depend on local conditions, e.g., the morning peak in the Novato Narrows typically begins as early as 5:30 AM and may last until 9 AM.
- B1-10 October 6, 2007 was a typical fall day for traffic, in terms of events, no unusual crashes, and weather. Therefore it is a valid day. Fall and spring conditions are typically considered the most representative of average annual conditions in transportation studies (e.g., studies of Bay Bridge traffic have typically been done on one day in October and a day in April). The purpose of this information was to characterize weekend traffic conditions, and to point out that there is existing significant traffic congestion in the corridor, even on weekends. This would tend to encourage train ridership on weekends. Traffic sensors in central San Rafael, where there is substantial congestion, will not be restored until construction on the gap closure is completed, which will be some time in the future.
- B1-11 This comment was answered on DSEIR page C.3-5 under Weekend Parking:
- There are no plans to run shuttles on weekends, although this would have only a small impact on parking, since shuttles are mostly intended to carry passengers from the station to their destination (primarily employment centers), not from their home to origin station. Passengers could walk, bicycle, drive, be driven, or take a bus or taxi to the stations on weekends.
- All of the commuter rail services that offer some weekend service included in the telephone survey have lower levels of feeder transit service levels on weekends. Some commuter rail systems have no weekend transit service at all. This is part of the reason why ridership is lower on Saturdays and Sundays than it is on weekdays, and thus is implicitly factored into the weekend ridership estimate and associated impacts.
- B1-12 SMART staff and consultants have been holding on-going discussions with bus operators that operate near proposed station sites. Local operators have expressed a willingness to consider coordination (for both weekday and weekend service). It is not possible to discuss final schedule coordination until firm schedules are developed; bus operators usually develop bus schedules just a few months prior to implementation “on the street.” It should be recognized that the ridership projections do not presume coordination with other local operators.
- B1-13 Using taxis as a feeder to transit is a small and not very widely recognized function of this mode of transportation. Someone who would pay for a taxi probably is not someone making the trip that often (e.g., perhaps a tourist or someone going to the airport). One advantage of taxis is that the fare is the same for a family or group travel; e.g., a two-mile taxi ride to the station might cost \$6 or \$7, but split among three people works out to only about \$2 per person.
- B1-14 This comment requests clarification regarding boarding trips and overall weekend ridership projections. To clarify references to trips, all trips are expressed as one-way boarding trips, which is the ridership methodology used by all transit agencies. The 2006 FEIR (page 3.2-10, Master Response C) said, in part:

The terms “trips,” “passengers,” “boardings,” “boarding passengers” and “ridership” are all synonymous with one-way passenger trips. If every passenger made a return trip, and rode every working day of the year, then the number of individuals using the system would be half the number of boarding passengers. However, there is considerable evidence that many people will occasionally use transit for a portion of their trip (perhaps catching a ride home with a friend), or may ride less than five days per week. This means that the actual number of people benefiting from the proposed service would be more than taking the number of boarding passengers and dividing by 2.

Regarding weekend ridership questions, no attempt was made to develop a station-to-station weekend trip table (trip matrix), because that is an output from the travel forecasting model, and the weekend ridership forecasting methodology used did not employ a “formal” mathematical travel forecasting model. It is unclear what would be the added value of ridership surveys or studies to show how many tourists and/or residents would use the train on the weekends; even a travel forecasting model could not reliably provide that information. The DSEIR presented a range of ridership projections, one which included the Capitol Corridor trains, and one which excluded them, to develop SMART’s weekend ridership estimate.

In San Diego, which has a considerable tourist industry, transit rider surveys indicate that approximately 6 percent of riders were from outside the area, and thus presumably are tourists.

Weekday travel forecasting models are readily available at the regional and county level in the Bay Area, and are in fact a requirement of some state and federal transportation planning law. These models typically produce an explicit, quantified number of person-trips for each household and job (stratified into various categories), and consider the distribution, choice of mode, and specific route used by each trip. They are extremely “data hungry” and as a result are seldom created from scratch, except in emerging metropolitan areas. They work well when there are known residential and job locations — the model is then oriented to predicting how many trips, and by what mode, travel will occur between these two locations.

The MTC travel forecasting model system, known as BAYCAST, provides forecasts for weekday, but not weekend travel. Predicting weekend travel is a much more daunting task and has rarely been undertaken except in places where there is significant recreational travel (e.g., national parks). Weekend travel is for the most part discretionary, in terms of when, where, and how the trip is made. Some trips may not be required, in comparison to the mandatory nature of most commute trips. Therefore, the difficulty of modeling these trips has led to relatively less effort being expended on them.

Most agencies that require weekend travel forecasts make use of a factoring process, e.g., this was done for the Sonoma County *Draft General Plan 2020*. SMART’s consultant is unaware of any *metropolitan* area or *urban corridor* that has a working weekend travel forecasting model. Southern California (SCAG) is in the development stages of such a model, primarily for use in predicting transportation-generated air quality problems (on some days, air quality in the South Coast area is bad on weekends). To develop and calibrate a full travel forecasting model for the area would cost approximately \$500,000, assuming existing data sources could be used (no new surveys). The consultant believes this would be a poor investment of public funds given the small additional accuracy in the forecast that it would produce. Alternatively, comparing the demand for other, actual weekend services in areas around the U.S. that have reasonably similar characteristics, in terms of land use intensity is readily understandable, reduces the effort considerably, and has greater utility.

- B1-15 The DSEIR (Appendix 2, page 6) notes that current commuter rail operations provide weekend service for as few as 700 riders per day (Metrolink IEOC line), and several are in the 2,000 to 3,000 riders per day range. The point is that with a significant investment in capital and infrastructure (trackway, stations, trains, etc.) the incremental or marginal cost of running the service on weekends is very low — it consists mainly of the cost of the train operator, fuel, and added wear on the train. This figure is very low. In economic terms, this is the difference between *fixed* costs (which do not vary with the amount of service supplied), and *marginal* costs (which do vary with the service). Please note that CEQA does not require a financial analysis as part of the SEIR.
- B1-16 Energy use and emissions related to train trips are calculated based on train miles traveled, not passenger miles traveled. The analysis uses the change in VMT (not total number of users) and the energy use of the DMUs, operating at the proposed service level. The energy use for the DMUs is generally the same whether the vehicle is full or partially full. Please see the 2005 DEIR and 2006 FEIR for details on the energy analysis.
- Weekend ridership and the number of cars taken off the road are from best available forecasts of transit demand. The comment is incorrect in stating that the ridership assumptions in the DSEIR are based primarily on a comparison with the Capitol Corridor commuter rail services' weekend service. Rather they are based on a comparison of seven different systems around the U.S., primarily in areas with lower density, auto-oriented land use patterns. The reasons for not doing a weekend travel forecasting model are stated in response B1-14.
- B1-17 The 2005 DEIR and 2006 FEIR showed that bio-diesel would cause slightly higher (additional two percent) emissions from the DMUs when compared to diesel. This effect would be similar in light DMUs, although no additional information is available from light DMU equipment suppliers on the effects of bio-diesel use. See response B1-8 for additional general information on bio-diesel.
- B1-18 See the 2005 DEIR and 2006 FEIR for a discussion of vibration impacts of the heavy DMUs, which were less than significant. Because light DMUs are lighter than heavy DMUs, vibration due to the light DMUs would be less than that shown in the 2005 DEIR and 2006 FEIR and thus would also be less than significant.
- B1-19 As noted in the 2006 FEIR, noise levels inside DMU rail cars have been measured between 68 and 78 dBA. These levels are typical of levels in transit vehicles, and similar to levels inside an automobile traveling on the highway. Interior noise levels often may be reduced through insulation and choice of materials used for interior finishing; these issues would be addressed during vehicle specification. Interior noise levels for the light DMUs would be similar, based on vendor data for Desiro.
- B1-20 The light DMU vehicle is lower to the ground than the heavy DMU. Light DMU vehicles have a floor height of approximately 22.6 inches, while heavy DMUs have a floor height of approximately 51 inches. In either case, the vehicles will be completely ADA accessible. State and federal law require that there be adequate access for all passengers, including those with disabilities. In addition, SMART will pursue level platform boarding, regardless of which vehicle type is selected. The precise method for achieving this objective will be determined in final engineering and will be based, in part, on which specific vehicle is ultimately selected. Moreover, the vehicle selection process will give consideration to how each vehicle type will achieve level platform boarding, which may influence vehicle procurement decisions.

- B1-21 As noted in response B1-8, for all freight and passenger locomotives, the fuel would be ultra low sulfur diesel as required statewide since 2006. Fuel economy with bio-diesel would be slightly reduced when compared to the ultra low sulfur diesel, as noted in the 2006 FEIR. Long term costs of fuels are not within the scope of the environmental review process.
- B1-22 The maintenance requirements are generally similar for light and heavy DMU vehicles. Vehicles will be maintained at the SMART maintenance facility. Two locations for this facility were studied in SMART's FEIR, one in Windsor and one in Cloverdale.
- The Siemens Desiro light DMU, currently in San Diego, obtains many of its parts from Germany. This does not necessarily mean, however, that acquiring parts for a light DMU would be more difficult or more expensive. Rail vehicle parts are sourced by vehicle manufacturers from all over the world in the case of both vehicles.
- See response B1-8 and B1-21 regarding fuel requirements. The fuel costs for operating a light DMU would be slightly lower, given the slightly better fuel economy as noted on page C.4-3 of the Draft SEIR. A financial analysis is not required by CEQA.
- B1-23 Draft SEIR Section C.4 relates to the proposed SMART project with light DMUs and is not intended to be a cumulative impact analysis. FRA requirements for light DMUs in relation to potential future freight operations are described in the cumulative analysis, which is in Draft SEIR Section C.6 (see Section C.6.5). Both light and heavy DMUs are still under consideration for the project. No final decision has been made. Most of the questions in this comment ask for details that are not relevant to assessing significant environmental impacts under CEQA. It would be speculative to guess whether FRA will grant the use of light DMUs and the timing for FRA approval is not under the control of SMART.
- B1-24 The DEIR section referred to in the comment described a 2002 passenger rail plan that was a precursor to the proposed SMART project. The 2005 DEIR analyzed both short-term (2010) and long-term (2025) impacts, assuming full operations of 28 trains per day. (2005 DEIR, Section 2.5.1, p. 2-13.) That level of weekday service was also assumed in the DSEIR; no expansion of that service is proposed. With respect to freight service, the DSEIR evaluated the cumulative impact of SMART's proposed service when combined with the maximum service proposed in NCRA's Notice of Preparation of an EIR for its Russian River Division Freight Rail Project. SMART's DSEIR also provided information on higher levels of freight service that are well beyond the three round trips per day proposed by NCRA in the NOP (see Master Response 2).
- Information regarding time separation of passenger and freight operations, in the event that light DMUs are used, is discussed in DSEIR Section C.6.5.1.
- B1-25 As noted previously, SMART is not planning for service expansions. Moreover, the DSEIR considers the cumulative impact of freight service well beyond that described in the NCRA NOP.
- B1-26 The Hamilton station site was re-designed during preparation of the Draft SEIR to preserve several large oaks on the property. Unlike some other types of trees, re-locating large oaks is not feasible. The 2005 DEIR Mitigation Measure BR3a addresses impacts on bird nests by requiring trimming and removal during certain time periods and requiring pre-construction surveys for nesting birds. See also response B2-35.

- B1-27      Undergrounding the existing transmission lines at the Hamilton alternative station site is not financially feasible for SMART, nor is it a required mitigation measure for the SMART project. CEQA requires mitigation of impacts caused by a project, not remediation of existing conditions. Screening the station is included in the proposed project, as described in Draft SEIR Section C.5.
- B1-28      The Draft SEIR night time visual analysis includes all hours of darkness, whether it is early morning or late evening. The same mitigation applies to all night time lighting (e.g. shielding of lights, landscape screening, etc.).
- B1-29      Table C-1, page 3.2-12 of the 2006 FEIR showed that the South Novato Station’s trips would be split about 65-70 percent from the south, and 30-35 percent from the north on a weekday. Q&A Research (March 2008) conducted a survey of Hamilton Landing employees, which indicated that, of workers who said they would use the proposed rail service, 58% lived in San Rafael or south. Because of the concentrations of employment to the south, an even higher percentage of Hamilton residents would be likely to commute to the south. The SEIR consultant estimates that approximately half the ridership of the Hamilton Station would come from area residents, and half from workers with jobs in the vicinity of the station. For the reasons stated in response B1-14, there was no formal origin/destination trip table developed for this analysis. See Master Response 3 regarding ridership projections for the Novato South Station alternatives.
- B1-30      The DSEIR notes that the Hamilton Station site is currently served by two GGT routes and an existing Hamilton shuttle (page C.5-33). SMART has no control over the location of Marin Transit’s northern transit hub, so therefore this question is not relevant to this SEIR. It is a question more appropriately posed to Marin County Transit District for their consideration.
- B1-31      It would be physically possible to have three stations, but not desirable, for at least three reasons: (1) the cost of additional stations; (2) the fact that schedules would be unfavorably affected (rail vehicles typically need about a mile to accelerate to 60 mph), then would almost immediately have to start slowing down; (3) equity with other cities (Santa Rosa, which is almost three times as large, is proposed to have only two stations).
- B1-32      The comment apparently confuses SMART’s proposed operating plan of 30-minute headways with time separations required by the FRA. The text on DSEIR page C.6-2 referenced in the comment describes the assumptions regarding SMART’s planned 30-minute headways and explains the rationale for applying this assumption to freight service for the cumulative impact analysis. The operating plan and, thus, the 30-minute time separation between DMUs would apply to both heavy and light DMUs. Under existing FRA rules, freight trains may follow heavy DMUs (and vice versa) as closely as the signal system will allow. For light DMUs, discrete time windows will have to be established to separate SMART passenger trains from freight trains, as described in the third bulleted paragraph on pages C.6-2 and C.6-17 to C.6-19 of the DSEIR, unless an alternative system, such as Positive Train Control, is approved.
- The amount of time separation that would be required if PTC were implemented has not yet been established, and will involve additional technical studies as the signal system is designed, as well as agreement among the parties, including the FRA.
- B1-33      It is not known whether the FRA will approve the use of Positive Train Control in connection with the use of light DMUs. For this reason, the DSEIR’s cumulative analysis does not assume development of this technology (see Assumptions, p. C.6-3). As discussed in the

cumulative impact analysis, light DMUs may be operated on the same line as freight trains with appropriate time separation.

SMART will be moving into the final design phase of the project over the next two years. During that period of time it is possible that additional decisions or rulings may be forthcoming from the FRA on this topic. The purpose of analyzing the light DMU at this time is to provide decisionmakers and the public with the necessary environmental impact analysis prior to recommending a final vehicle. Schedule impacts on light versus heavy DMUs are noted in SEIR in the conclusion that SMART's mid-day train could not be accommodated if both light DMUs and freight were operating. The use of light versus heavy DMUs would have minimal impact on tracks, signals and other capital improvements.

Cost analysis of the proposed use of light DMUs is not part of the SEIR process.

B1-34 SMART has consistently proposed 30 minute headways in the peak period for passenger rail service. SMART has no plans for expanded service, other than the four weekend trips analyzed in the SEIR. See response B1-24.

B1-35 The comment asks for additional information regarding the project analyzed in the 2005 DEIR and 2006 FEIR; this information is not necessary for the supplemental analysis of the changed circumstances that are the subject of the SEIR. The NCRA's maintenance and repair of the existing track between Cloverdale (MP 85.4) and the Ignacio Wye (MP 25.8 near State Highway 37) will not bring the level of track to the standards and requirements for the operations of SMART passenger trains. The NCRA maintenance work will not require SMART to perform any additional work that is planned for the upgrade of the track. The upgrade of the track to SMART passenger operating conditions from Healdsburg to the Ignacio Wye (near Hwy 37) is included in SMART's most current cost estimate. The capital cost estimate for the upgrade of track and bridges to passenger rail standards was prepared independently by SMART.

B1-36 Light DMUs would NOT require a different level or quality of track improvement than heavy DMUs.

B1-37 Having freight service operate on the same track as SMART will require more maintenance than if there were no freight service; the Operating Agreement between SMART and NCRA will address the responsibility of each agency for maintenance and repairs. Tracks will be maintained as necessary to safely operate both passenger and freight operations; neither light nor heavy DMUs will be required to be "forgiving."

B1-38 Of the four sidings proposed in the NCRA letter to SMART dated November 27, 2007, only three of them are planned to be placed on the SMART rail corridor. The three locations are as follows:

- Just south of the Haystack Landing (Petaluma River) bridge, 0.74 miles long
- North of Rohnert Park between Todd Road and the Highway 101 overcrossing near Wilfred, 1.58 miles long
- South of Santa Rosa between Bellevue Avenue and Todd Road, 0.90 miles long

None of these siding locations would be in conflict with the planned SMART pathway. However, it is important to note that NCRA subsequently indicated in a January 2008 letter that these siding locations were not final and different sidings may be identified in its EIR,

currently in preparation. If new siding locations are identified, NCRA will be required to conduct both project and cumulative impact analysis in their EIR.

- B1-39 The calculations of freight train length stated in the question are generally correct. A 40- to 60-car freight train would extend across more than one intersection, when the length of the train is more than the distance between intersections. However, the fact that the train is moving is the key point. It is the length and speed of the train that determines the blockage time at each individual intersection. See DSEIR Appendix 2 for additional detail regarding delays at intersections. The impact of freight trains on emergency vehicles and/or public crossings is primarily a matter for NCRA's project DEIR, which is under preparation; the cumulative impact of freight and passenger operations is less than significant, as described in the DSEIR. SMART's trains will not extend across multiple intersections and will not substantially delay traffic flow at crossings, as the total gate down time would be 35-40 seconds. Furthermore, it should be noted that most cities have emergency services on both sides of the SMART tracks, minimizing the impacts of delay. This topic was addressed in the 2006 FEIR Master Response E.3 (pages 3.2-23 and -24). See also response A1-18.
- B1-40 The question incorrectly presupposes an "increase of SMART's passenger service beyond its currently proposed startup level of service." The "startup" service referred to was in a 2002 feasibility study, and was not part of the DEIR or FEIR. There are no plans contemplated to increase or change the SMART service beyond what is stated in the Project Description of the DSEIR. See also response B1-24.
- B1-41 The significant noise impact takes into account the potential for sleep disturbance by considering the noise in terms of day-night levels (Ldn). The Ldn metric applies a 10 dBA penalty to noise that occurs between the hours of 10 p.m. and 7 a.m. to account for the additional sensitivity of people during nighttime hours. Contrary to the comment, SMART is not contemplating an increase in service beyond the year 2025 service analyzed in the 2005 DEIR, 2006 FEIR, and DSEIR, nor would the use of light DMUs force freight trains to run at night, due to the elimination of SMART's midday train (see DSEIR, p. C.6-18). Rather, as explained throughout the DSEIR, freight service can be accommodated on the SMART corridor during daytime, non-peak hours. Nevertheless, because the freight operator may choose to operate freight trains at night, the DSEIR discloses the additional cumulative noise impact that would occur (see page C.6-14).
- B1-42 The reference is on page C.6-14 (the commenter says -15) and refers to a specific combination of length and speed for a medium volume street. The purpose of the range given on page C.6-6 was to bracket the slowest freight train (20 mph) crossing a low volume street (87 seconds), and the slowest freight train crossing a high volume street (just over 3 minutes).
- B1-43 See response B1-7. Regarding the purpose of the midday train, see Master Response A.3 in the 2006 FEIR.
- B1-44 The travel mode selection of passengers between buses, SMART, and motor vehicles dictates the level of energy and greenhouse gas savings, as illustrated in the discussion of greenhouse gas reductions in DSEIR Section C.3.2 (Impact AQ-3). Contrary to the comment, the DSEIR concludes that the SMART proposed project with weekend service added provides environmental advantages over express bus service. (As noted in Section D.1, under CEQA the comparison of alternatives focuses on the project as a whole, rather than its various components.) The weekend and weekday service together provides benefits in energy and greenhouse gas savings compared to the alternatives. The emissions from the future bus fleet include buses with higher fuel efficiency than today's, reflecting increased use of hybrid or zero-emission vehicles.

SMART does not propose any changes to the GGT Route 80 schedules. The statement that, “There is no information given in the DSEIR regarding Golden Gate Bridge and Transit District’s weekend bus service,” is incorrect. This information is provided on pages C.3-3 and C.3-4 of the DSEIR. It notes that Route 80 runs hourly, and that combined with the Route 70 service to Novato south, there is service every 30 minutes in Marin County. The level of detail requested in the comment is not necessary for purposes of assessing the incremental environmental effects of adding weekend service to the proposed project. As for the running time information, the commenter appears to assume that the mode with the faster travel time (whether bus or auto) would get all of the trips. This is contrary to what is known about how people choose modes; if two modes are exactly identical in all respects—cost, travel time, comfort, etc. — half would choose one mode and half the other. One mode can be slower than another (door-to-door) and still capture a reasonable share of the market between two points (as most transit is slower than driving, at least in most American cities). The question also presupposes an overwhelming desire to reach San Francisco, whereas SMART will serve primarily intra-district travel.

- B1-45 Emission forecasts for future bus fleets, including CARB-approved forecasts of cleaner bus fleets, are included in the 2025 No-Project scenario that was the basis for air quality analysis in the 2005 DEIR and 2006 FEIR. These forecasts include a certain level of conversion of the fleet to new technologies. The changing nature of future bus fleets and continued deployment of alternative fuel buses, diesel-electric hybrids, or zero emissions technologies would not be affected by the SMART project, and the ability of transit agencies like Golden Gate Transit to implement these technologies does not depend on whether the SMART project occurs. Since the future conversion of buses to new technologies is included in the baseline for analysis and the SMART project would not affect the emissions from the buses, no additional quantification of energy use or emissions is needed to conclude that SMART service would perform as shown in the DSEIR.

## Comment Set B2 Marin Conservation League



### MARIN CONSERVATION LEAGUE

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April 15, 2008

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Enclosed are comments, questions and clarifications regarding the SMART Supplemental Environmental Impact Report (SEIR) as developed by the membership of the Marin Conservation League, based on our review of the Draft SEIR and supporting documents. We look forward to your response to these comments.

#### Weekend Service

B.2.1 Additional ridership analysis of weekend service is required. Boardings and Lightings should be defined. This information is needed so as to determine the load factor of the entire route and to determine Passenger Miles for the weekend service. This information would then be used to conduct a proper comparison of energy consumption and air quality with alternatives. The information is also needed to conduct an adequate Financial Analysis including revenue and expenditures of the weekend service. Given the low ridership per day, will SMART weekend service be in conformity with PUC and MTC farebox recovery regulations? Would more riders be gained if the miles of weekend service were re-directed to additional weekday trips and service? Consider adding trips with 30 minute headway throughout the day.

B2-1

This section suggests that (2) trains could be stored in Cloverdale and thus reduce deadheading. The SEIR proposes four round trips per day for weekend service. The SEIR should disclose the schedules proposed. If train(s) start at Cloverdale at a reasonable time, it will be an hour later for the first train to arrive in Larkspur to start northbound service. What is the demand for riders at different times of the day? Disclose the impacts of these schedule constraints.

B2-2

The SEIR states that Saturday service has up to 2020 riders on 4 round trips, which would be 8 one way trips. This would average 252 riders per train. The SEIR must identify the configuration of the Heavy or Light DMU's that could accommodate this number of riders. If the 252 riders do not go the full length of the project, then the SEIR must identify the location of boardings and lightings as was done in the DEIR.

B2-3

The SEIR should make a confirming statement that SMART will comply with the requirements of AB-2224 that stated there were to be no passenger stations between Cloverdale and Healdsburg. This must apply to weekend service.

B2-4

*Marin County's Environmental Guardian*

A nonprofit corporation founded in 1934 to preserve, protect and enhance the natural assets of Marin County.

## Comment Set B2, cont. Marín Conservation League

### Weekend Transit Service Levels

Pg. C.3-3. The SEIR goes into considerable length describing existing weekend transportation (bus) service. It is also necessary to estimate how many of these bus riders will shift modes and ride the weekend train. The SEIR should also estimate how much weekend bus coverage will be eliminated because of the mode shift of some riders. Note that when a given route loses riders to rail it is common for bus operators to cut back on low ridership routes. This results in the remaining bus passengers suffer a loss of mobility. This is an example of how the spreading of transit financial and ridership resources results in degraded service. The SEIR should analyze this degradation of service. It also follows that if the bus operators do not cut back operations the VMT for bus and rail remain the sum of both systems.

B2-5

### Light DMU's

B.2.2 The SEIR should evaluate the effects of greater acceleration and deceleration possible with the light DMU's; does this movement cause discomfort with passengers? If the train accelerates before the passenger has been seated with the passenger be thrown off balance and possibly injured. This is particularly significant for seniors, who are likely passengers.

B2-6

The internal configuration of the candidate light rail cars should be included in the SEIR, including provisions for bikes and assessment of the railcars' ability to accommodate the likely bike passenger traffic. There also needs to be provision for restrooms to meet ridership needs for those taking the long trip from Cloverdale to Larkspur.

B2-7

The Light DMU depicted in the SEIR shows two cars permanently connected. If such is the case, the SEIR should indicate wasted energy while the second car is being pulled during periods of low ridership.

B2-8

Section C.4 Page C.4-2 The SEIR claims greenhouse gas emission and energy consumption improvements with the use of Light DMU's. The SEIR should include detailed performance specifications of the Light DMU, relating to fuel efficiency and engine, transmission, brake, passenger comfort and serviceability. The SEIR should disclose whether the SMART Technical Advisory Committee has reviewed the currently available Light DMU's.

B2-9

### Novato South Station

B.2.3 The SEIR should more thoroughly evaluate the impacts of placing a South Novato Station where it is not accessible to the trunk line buses traveling along Highway 101. The location of this station will make it impractical for rail passengers to shift to and from GGT main lines 54, 56, 58, 70, and 80. It also makes it difficult for passengers living in Ignacio to walk to the Hamilton site. What is the net negative impact on the selection of the Hamilton Site? The SEIR must explain how the ridership at Hamilton is twice that of Los Robles despite the fact that the Los Robles was in close proximity to Hamilton, Ignacio, new Safeway shopping center and Bel Marin Keys. The SEIR must also explain how the Hamilton station will attract riders as it will only link with local buses and shuttles, and not trunk line bus service.

B2-10

B.2.3.3 Note on Pg. B-11 the sentence "No larger bus transfer center is proposed for this site." The DEIR should clarify whether they are referring to large buses or referring to enlarging the proposed Hamilton site.

B2-11

## Comment Set B2, cont. Marin Conservation League

Section C.5.3.1, Page C.5-33, Third paragraph. The SEIR states that the Hamilton site is “somewhat” removed from the freeway. See our comments on Page 2, starting with B.2.3. The SEIR should develop and document its methodology for determining changes in ridership for alternative considered. If the MTC model could not differentiate ridership levels, the SEIR should conduct surveys of current riders boarding at the Ignacio Interchange and into the Bel Marin Keys Industrial Park. Earlier ridership methodologies place strong emphasis on the proximity of home/work to train station.

B2-12

Impact T-2, Page C.5-34 How were the ridership numbers included in the supporting paragraph determined? It is counter intuitive to assume that there will be greater ridership at the Hamilton site compared to Ignacio with its high density housing, proven ridership and access to Bel Marin Keys.

B2-13

### Freight Trains

Table B-1 The SEIR should explicitly include a table of alternative freight train trip numbers assumed in the SEIR analysis. The SEIR should present information objectively, avoiding prejudicial language such as identifying Scenario #1 and #2 “as speculative”. Were these scenarios identified as speculative in any NCRA documents? Otherwise if the SEIR were to identify these scenarios as “speculative”, then all of the SMART operating scenarios and ridership estimates should also be similarly identified as “speculative”; The public expects and deserves a balance, objective document.

B2-14

B.3.3 The SEIR states in second paragraph on Pg. B-23 that “most freight trips could be accommodated during day and evening hours and ...minimizing the need for nighttime trains.” Yet is the next sentence the SEIR states that there is not enough documentation to determine how the freight operation will be conducted. The SEIR should remove the statement that nighttime trains will be minimized and should state that NCRA can operate freight any time over a 24 hour period except when tracks are occupied by SMART trains. As noted above, the SEIR should present a table clearly showing the alternative freight train configurations (number of trains, number of cars, etc) analyzed in the SMART SEIR.

B2-15

B-3.4. This paragraph states “Depending on the level of future freight service, the midday passenger service may not occur”. This implies that the NCRA can determine if midday service will occur. Yet midday service was a critical factor in estimating total SMART ridership. Midday service is needed to provide riders assurances of getting home in emergencies, and provide convenience to part time workers and students (to SRJC, Dominican, and elsewhere). The SEIR should clarify this paragraph or include new estimates of total ridership if midday service is preempted. The loss of midday service would be a significant impact on GHG emissions and air quality and should be so analyzed.

B2-16

B2-17

### Hours of Freight Operation and System Capacity

Page C.6-2 What are the details of the system capacity? The SEIR should contain one or more tables showing how trains would be handled at the maximum capacity point for each scenario.

B2-18

### Freight Locomotives

Page C.6-3 The SEIR should include detailed performance characteristics of the “non road” Tier 3 locomotives. What is the availability of these types of locomotives? At the April 9, 2008 NCRA meeting in Petaluma it was stated the Tier 3 locomotives were not on the development horizon. What binding regulations would require NCRA to upgrade their locomotives instead of

B2-19

## Comment Set B2, cont. Marin Conservation League

continuing to use their old equipment? There should be a written commitment by the Freight Operator that Tier 3 Locomotives will be used, and in what time schedule. The SEIR should clarify the type of fuel used to compare the fuel consumption in footnote 10, Page C.6-9. If this additional information is not available, the SEIR should assume that freight rail operations would use the poorest equipment allowed by law, including grandfathered equipment.

B2-19 cont.

### Air Quality

C.2.2.2 The methodology for determining air quality comparisons must be documented and results presented. The first paragraph on Pg. C2.5 states" ...that the benefits achieved by SMART in taking cars off the road may not be as large as identified in the 2006 FEIR". The DEIR should show the revised figures for pollutant emissions with heavy and light DMU configurations. The analysis should relate all air pollutants on a passenger mile basis. This is particularly true since the weekend service is going to have low daily ridership but still consume nearly the same energy. The statement that the emissions are based on a fuel consumption per day basis provides no basis for comparison of emissions with other transit modes. It follows that the statement in C.2.5.1 that there is no inefficient use of fuel must be revised to reflect the passenger/mile factor. The term "inefficient use" needs to be defined. We believe the measure of efficiency used here is the energy consumed per person for each of the modes of transportation. Comparisons with the no build case or bus alternatives must also incorporate consideration of the number of rail passenger trips diverted from buses, carpools and passenger drop-offs as well as include emission for shuttle buses and rail car non-service deadheading.

B2-20

B2-21

B2-22

### Public Safety

C.2.10.1 The addition of weekend service creates potential risk for children roaming the community, including the crossing or walking parallel to the rail line. This is reflected in the recent fatality of a student walking the tracks in Oakly while wearing earphone so did not hear the train coming. More operating hours increases the probability of accidents. The SEIR should reflect that fact.

B2-23

### Weekend Passenger Rail Service

C.3 The SEIR must restate the purpose for this service. Table C.3.2 shows that there was heavy congestion in Santa Rosa and the Highway 101 segment between Highway 37 and San Pedro Road. All other segments had either no congestion or moderate congestion. The two segments with heavy congestion are the very sections where major construction is being completed to provide an extra lane through these segments. The SEIR should also reflect the improved schedule of construction of the Marin Sonoma Narrows. The SEIR should evaluate the traffic conditions relevant to the post-2011 period when SMART will be operating and highway improvements are completed.

B2-24

### Weekend Project Ridership Forecasts

Pg. C.3-5. The ridership forecast by analogy is a marginal guess at best. The passenger ridership estimate range shown is indefensibly narrow – 100 to 200 for Sunday and Saturday respectively – when the crude, broad-brush methodology can support +/- 15-30% at best. The SEIR does not indicate what "weekend attractions" can be reached from destination train stations in the absence of buses (i.e., by walking, bike or taxi/car rental options). Nor does the SEIR explicitly consider the effect of the adjacent pathway on train usage. The SEIR should include a comparison of service areas for its benchmark comparison systems listed on this page as well as more direct analysis of the SMART corridor attractions and train/pathway synergy. What is the

B2-25

B2-26

**Comment Set B2, cont.  
Marín Conservation League**

population density compared to Marín and Sonoma Counties. Of great importance is how the population density is distributed over the route. What are the attractions at the ends of the routes? SMART's highest weekday ridership is concentrated in the middle of the route. What are the lengths of the routes listed? What is the seasonal variance in ridership? Compare that with the variance of GGT ferry and bus ridership over the year.

B2-26 cont.

Weekend Shuttles

If shuttles will not be available for weekend service, the SEIR should determine the added induced VMT auto traffic is created by the SMART weekend service.

B2-27

Future Highway and Roadway Conditions

Pg. C.3-6, fourth paragraph, states there are 2050 rail trips that would reduce VMT by 11,000 per day. That comes out at 5.3 miles per trip. The SEIR needs to determine and document the VMT per day, per rider.

B2-28

Energy

C.2.5.1 Regional Setting. This section of the SEIR concludes that it is unnecessary to revisit the prior analysis of the proposed project with updated baseline projections even though New Vehicle Energy Efficiency Standards will be in effect during the time period of the project as reviewed in the FEIR. The SEIR states that " Because new standards for motor vehicles would result in more fuel efficiency for the passenger vehicle fleet, the net reduction in energy use associated with the SMART project compared to the 2025 No-Project would not be as great as identified in the 23006 FEIR." This observation is an important one.

B2-29

We remind SMART that the FEIR adopted the conclusions of the November 2005 DEIR regarding the Indirect and Direct Energy Consumption Projections as follows: (figures in thousands of barrels)

	<u>Proposed Project</u>	<u>No Project Alternative</u>	<u>Express Bus Alternative</u>
Indirect	2,760	2,766	2,790
Direct	6,135	6,147	6,200

We note that the Indirect and Direct Energy Consumption totals for the proposed SMART project as compared with these alternatives were only marginally superior. The new regulatory fuel efficiency standards for vehicles which are now known and established law will have a substantial impact on vehicle energy consumption, and, therefore, deserves careful analysis in this SEIR. It is not clear under these circumstances that SMART's energy consumption will continue to be superior. The projected Indirect and Direct Energy Consumption Projections should be re-calculated in incorporate the new regulatory regime for vehicle fuel efficiency standards plus expected/planned adoption of Hybrid technology for Express Bus Service in the region.

## Comment Set B2, cont. Marin Conservation League

### Air Quality Impacts and Mitigation Measures

Pg. C.3-10 The section on Impacts and Mitigation is poorly written and confusing. The method of calculating greenhouse gas emissions and source of methodology must be documented along with the detailed results shown within the SEIR.. The negative symbols in Table C.3-5 and C.3-6 are not defined. The text on Page C.3-11 appears to state that there will be a net increase in CO2 with the added weekend service and yet it implies that this is acceptable because the combined service, daily and weekend, is still below BAAQMD standards. The SEIR should show calculations and results that there is an increase in CO2. Impact AQ-3 should read "The proposed project of added weekend service increases the discharge of greenhouse gases." In addition the SEIR needs to incorporate a Table or Figure reporting total daily greenhouse gas emissions in Marin and Sonoma counties and the emission reduction due to SMART.

B2-30

It must estimate and document the number of train passenger trips which are diverted from carpools, buses and passenger drop offs. Moreover the SMART rail air emissions must include the emissions from in-service train operation, from deadheading to the maintenance facility and overnight storage, and from shuttle buses. In addition the SEIR needs to incorporate a Table or Figure reporting total daily greenhouse gas emissions in Marin and Sonoma counties and the emission reduction due to SMART

B2-31

### Documentation of Air Quality Emissions Calculations

Comparisons with the no build case or bus alternatives must also incorporate consideration of the number of rail passenger trips diverted from buses, carpools, and passenger drop-offs as well as include emissions for shuttle buses and rail car non-service deadheading. Emission comparisons should include advanced-technology hybrid and alternative fuel buses.

B2-32

Regarding the weekend rider estimation methodology, the SEIR should identify how many of the weekend riders are induced trips that otherwise would not be made. Such riders would not create an auto trip offset of energy and greenhouse gas emissions. The same consideration of induced trips applies to the energy offsets described in Section C.3.3, Page C3-13. The Energy section of the SEIR should thus be modified.

B2-33

### Permanent Loss of Wetlands

BR-5a and 5b, Page ES-8, explains Mitigation Measures to replace impacted Wetlands at a minimum 1:1 ratio of acres of habitat permanently impacted/affected. There should be an explanation of the rationale for a 1:1 replacement ratio, especially in light of the fact that it is common practice in such cases to have a higher replacement ratio of 2 or even 3:1. Replacement wetlands are not as successful as established wetlands which is why a higher replacement ratio is a more appropriate mitigation.

B2-34

### Tree Loss

Impact BR-8, Page C.3-38 The SEIR should contain strong language regarding the saving of the existing Oak trees. We cite the example of the loss of a mature Oak tree in the Whole Foods Project where the tree was damaged by the developer causing its demise. Mitigation measures must be included to protect the Hamilton trees.

B2-35

### Quiet Zones

N-5, Page ES-16 explains The Mitigation Measure for Train Horn Noise and notes that Train Horn Noise is a Significant and Unavoidable impact. However, the mitigation does not state that

B2-36

## Comment Set B2, cont. Marin Conservation League

this must be a Condition Precedent to the operations of SMART in order to be effective. The SEIR analysis should be expanded to clarify how and where Quiet Zones will be put into place, their cost, and what procedural steps are required to implement this Mitigation. Without this analysis and exposition the public will not know what the prospects are for its implementation.

B2-36 cont.

### Noise

Impact N-2, Page C.5-44 The SEIR states that the long term noise increase in the Hamilton station vicinity would be less than significant. Yet, in San Rafael SMART is building a soundwall between the tracks and the adjacent residential area. The SEIR should explain why these two residential areas are being treated differently. What is the likelihood that SMART will have to come back later and build a soundwall at the Hamilton Station?

B2-37

### Assumptions

Page C.6-2 The SEIR should clarify the effect of passenger and freight trains traveling in the opposite direction. The first assumption mentions a "following train" with 30 minute headways. The SEIR should identify the handling of trains going in the opposite directions. If a passenger train is going to be stored in Cloverdale at the end of the day, will this require that the freight train stay off the track until the last train arrives in Cloverdale?

B2-38

### Reduction of VMT & Traffic on Highway 101

Page C.6-4 The SEIR should disclose the source of the number "10 and 14% of 3+ axle trucks" being removed from the highway as a result of the freight rail operation. The SEIR does not explain this assertion, and should elaborate on why this is the case. Freight transfers from truck carriage to transport by train is likely to occur only for commodity products in carload lots. The SEIR should expand its analysis of Freight Transport in the corridor to justify this statement.

B2-39

### Vibration

Page C6-15 Freight trains with heavy loads and dual locomotives will induce more vibration that was evaluated in the FEIR. Of particular importance is the effect on non-invasive surgery conducted at Novato Community Hospital and associated doctors' offices. Note that the two buildings south of the existing hospital have been taken over by Sutter since the FEIR. A careful examination of the potential vibration problems should be conducted.

B2-40

### Public Safety

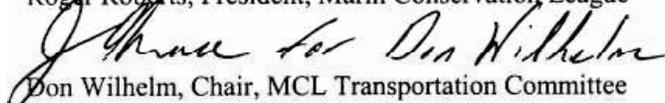
C.6.5 Public Safety, Page C.6-16. The SEIR states that solid waste hauling trucks are fully enclosed. This is not true. Many of the solid waste trucks have open mesh screens over the top of the trailer. At present the resulting litter gets picked up by routine highway maintenance crews. The SEIR should identify how the railroad right of way will be maintained.

B2-41

Yours truly,



Roger Roberts, President, Marin Conservation League



Don Wilhelm, Chair, MCL Transportation Committee

## Responses to Comment Set B2 Marin Conservation League

B2-1 The terms “boarding” and “alighting” were explained in the 2006 FEIR. A “boarding” is a person stepping on to a train. An “alighting” is someone stepping off a train. Every passenger trip has one boarding and one alighting. To determine the passenger miles for the service, a trip table of station origins and destinations is not required; only the average trip length is required. The information provided in the DSEIR adequately addresses the incremental environmental effects of adding weekend service, including energy consumption and air quality, as required by CEQA. With respect to farebox recovery requirements, a financial analysis is outside the scope of the DSEIR

The purpose of adding weekend service to the proposed project is to expand the opportunities for district residents to use the service, not just to maximize ridership. This is a policy decision rather than a technical one; evaluation of weekend service in the SEIR was directed by the SMART Board in response to numerous requests.

B2-2 The DSEIR assumes four roundtrips per weekend day for purposes of assessing the incremental environmental impacts of adding weekend service. The additional detail requested in the comment is not necessary to adequately make this assessment. See also response B2-1 regarding the purpose of adding weekend service to the proposed project.

B2-3 The 252 riders per train represent boarding passengers *per train*, over a 70-mile line. Not all riders are making end-to-end trips; some riders may be traveling from Windsor to Petaluma, while another rider may go from North Novato to Larkspur. Therefore, the number of seats does not define the total number of passengers carried as there is turnover of individual seats. The level of detail requested in the comment is not necessary to adequately assess the incremental environmental impacts of adding weekend service to the project.

B2-4 SMART will comply with state law that prohibits commuter stations in the unincorporated area north of Healdsburg in Sonoma County (Pub. Util. Code, §105096, subd.(d) (AB 2224)).

B2-5 The 2005 DEIR and 2006 FEIR forecasting work included a “network type” computer model that made it possible to estimate how many new rail riders would be diverted from buses.

Response B1-14 explains why the DSEIR weekend forecasting technique was used. Master Response H of the 2006 FEIR noted that perhaps an 8% reduction in bus ridership on routes parallel to SMART (i.e., GGT 70/80) would occur as a result of riders shifting from bus to rail.

Common sense indicates that bus and rail services are different enough that they would not compete for the same passengers; GGT buses do not run north of Santa Rosa, and SMART, unlike GGT, does not run south of Larkspur into San Francisco. Passenger surveys on the San Diego *Coaster* indicate that 83% have a car available for their trip, but chose to use the train instead. The (weekend) running time from downtown Santa Rosa to downtown San Rafael transit center via bus is 93 minutes,<sup>1</sup> compared to 50 minutes for the same trip from Jennings Avenue (Santa Rosa). GGT will run more frequently (hourly through most of the day, half hourly south of Novato) and will have more stops. Contrary to the comment, the addition of a

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<sup>1</sup> Time is prior to lengthening of bus schedules due to construction on Highway 101 in Santa Rosa and San Rafael.

new mode of transit in a region does not necessarily result in the “degradation” of existing transit service. See information in comment and response D26-3. Predictions about service reductions are speculative at best. At meetings with GGT planners, they indicated that they have no set criteria for making such changes. Once the SMART service commences, they would evaluate ridership changes and the best deployment of services — as they continually do today.

B2-6 Light DMU vehicles are in operation all over the world. Their acceleration does not cause passenger discomfort. Naturally, when passengers are seated it will minimize the risk of stumbling and falling over, just as it does in buses, ferries, BART, and other commuter rail trains.

B2-7 See responses B1-2 and B1-3.

B2-8 The photograph of the North County Transit District’s “Sprinter” railcar does not show two cars permanently connected to one another. The photograph on page B-4 of the DSEIR is of one rail car. These cars have nose cones at each end, so that if a single car were operating, it would be aerodynamic whichever direction it is traveling. Rail cars can be connected and disconnected from one another, allowing for flexibility in overall train capacity.

The energy consumed per train for the light DMU would be similar during times of low ridership and higher ridership. No revision is needed to the forecasts of energy consumption and the comparison to auto-based vehicle energy consumption. See response B1-16 regarding energy use calculations.

As noted in the SMART 2005 DEIR on pages ES-1 and ES-2, one of the objectives of the SMART project is to provide “an alternative transportation option to automobile travel in the highway 101 corridor.” In the year 2000, the average vehicle occupancy in the Bay Area was 1.1 during commute hours. Meanwhile the average capacity of the vehicle fleet was well in excess of 4 seats per vehicle. The discrepancy between the size of vehicles and their passenger loads represents an existing substantial “waste” of energy.

B2-9 The DSEIR Project Description in Section B.2.2 identifies performance information for two similar light DMUs being reviewed by SMART. Fuel efficiency is discussed in Section DSEIR Section C.4.3. Because the energy use analysis in Section C.4.3 uses a fuel economy performance factor that would be achievable by either of the light DMUs under consideration or other similar equipment if available, no additional detailed specifications are needed to demonstrate that the energy use impact would be less than significant.

The purpose of the SEIR is not to make a determination about which rail vehicle to purchase. Rather, it is intended to evaluate the environmental impacts resulting from the potential use of a light DMU. Prior to vehicle procurement, SMART will evaluate in detail the performance specifications of all vehicles being considered. SMART will seek public input on this decision prior to final selection by the SMART Board. As noted previously, there are multiple manufacturers of light DMU vehicles, including Siemens, Bombardier, Stadler and Alstom. Passenger comfort is not an issue requiring analysis under CEQA.

B2-10 This is not a comment on the adequacy of the SEIR’s environmental analysis. Linkages with transit are factored into the transportation and intersection LOS analysis. If a bus rider is on one of the mainlines referenced in the comment, it is unlikely that they would transfer to or from rail in Novato. It is more likely that rail transfers in Novato would come from Marin County local routes. Better transfer opportunities exist at downtown San Rafael, since SMART trains will be timed to GGT’s “pulse” there. See Master Response 3 for information regarding

ridership. The ridership projections for the alternative station locations are adequately explained in the DSEIR.

B2-11 SMART is not proposing a large-scale transit transfer center at the Hamilton site. The only bus transfers that would occur are riders from local buses and shuttles to trains and vice versa.

B2-12 See response B1-14 and response B2-10. This type of survey is not typically used to project ridership, because it is not considered reliable and would not likely be accepted by FTA for purposes of directly forecasting future ridership. GGT is in the process of conducting rider surveys to gather demographic information, which SMART may use in the future.

B2-13 See Master Response 3 regarding ridership estimates for the Novato South Station alternatives.

B2-14 DSEIR Table B-1 provides the freight train numbers assumed for each cumulative scenario in the DSEIR analysis. Regarding the rationale for describing Speculative Scenarios 1 and 2 as speculative, see DSEIR Section B.3 and Master Response 2.

B2-15 It is true that the projected freight operations, as proposed by NCRA, could be accommodated within day time hours. However, the Draft SEIR (Section C.6.1) acknowledges that freight trains could operate at night and the analysis includes assessment of impacts of nighttime freight operations. Table B-1 in the Draft SEIR shows the estimated number of freight trains and cars per train, based on available information.

B2-16 For reasons stated in the DSEIR, the operating schedule would be a negotiated issue between NCRA and SMART, subject to the provisions of the right of way agreements and enabling legislation. See also response B1-7.

B2-17 Deletion of the midday train service would not be a significant impact on greenhouse gas emissions. The overall project reduces greenhouse gases and has a net environmental benefit. Eliminating one roundtrip per day would have the potential to slightly reduce greenhouse gas benefits, but there would still be a substantial benefit associated with the project.

In addition, elimination of the midday train would only occur if light DMUs were the selected vehicle *and* if freight service were to resume on the rail corridor; light DMUs have additional beneficial air quality effects due to lower emissions and a greater decrease in GHG emissions over heavy DMUs. Therefore, no significant adverse effects would occur if the midday SMART train were eliminated.

B2-18 Additional details regarding system capacity are not necessary for an adequate supplemental analysis of cumulative impacts. See Master Responses 1 and 2. The DSEIR appropriately analyzes the reasonably foreseeable probable freight project for purposes of assessing cumulative impacts from freight and passenger service, as well as disclosing possible impacts from a highly speculative level of 16 freight trains per day; determination and analysis of the “maximum capacity point” is not required by CEQA.

B2-19 As described in the DSEIR, SMART’s assumptions regarding the locomotives that would be used by NCRA’s freight operator are reasonably based on NCRA’s 2007 NOP and Initial Study and subsequent clarification from NCRA, which is the best available information. It is important to note that NCRA is responsible for preparing its own EIR that would provide more detail, as needed, to characterize the emissions and fuel economy of freight service (also see Master Response 2). For all freight and passenger locomotives, the fuel would be ultra low sulfur diesel as required statewide since 2006.

- B2-20 The baseline forecasts of the 2025 motor vehicle traffic emissions were reviewed for the DSEIR, but revising the baseline of the 2006 FEIR is not required for supplemental air quality analysis. With environmental compliance measures to reduce NO<sub>x</sub> from the heavy DMUs or light DMUs, the increases in emissions would be less than significant. See response B1-8 for additional information on the emission benefits from taking cars off the road.
- B2-21 Energy use and emission calculations and comparisons are based on the number of rail and vehicle trips because it is the number of trips, not the number of passengers, that dictates energy use and emissions. DSEIR Section C.3.3 shows that adding weekend service would marginally increase energy consumption but the energy savings with the proposed weekday service would continue to outweigh the marginal increase on weekends. Additional details about the methodology for calculating energy use and emissions are provided in the 2005 DEIR.
- B2-22 The referenced emission sources and savings are factored into the overall comparative analysis. VMT changes are related to VMT on Highway 101. SMART shuttle VMT represents a very minor factor in the overall calculation of area-wide impacts. SMART intends to reduce deadheading by strategically storing trains overnight at passenger stations, such as Larkspur and Cloverdale, not just at the maintenance facility.
- Weekend passenger rail service diverting some patrons of buses to rail has been considered, but the number of bus-miles-traveled would not be notably affected. Rail patrons who are diverted from carpools and drop-offs are counted with the reduced passenger vehicle-miles-traveled.
- B2-23 Safety risks are analyzed in Impact PFS-4 in Section C.3.5 of the Draft SEIR.
- B2-24 DSEIR Section B.2.1 describes the reasons for offering weekend service. See also response B2-1. Future improvements on Highway 101 now under construction were factored into the original analysis for the weekday service. Weekend service is expected to reduce overall VMT on Hwy 101, so would not cause further congestion on 101; additional analysis is not required. It should be noted that even with these 101 improvements, long-term conditions would be congested, similar to current conditions.
- B2-25 See response B1-14.
- B2-26 The requested detailed information is not necessary to conduct an adequate CEQA analysis. The analysis in the DSEIR is based on reasonable assumptions to forecast the likely impacts of the incremental environmental effects of adding weekend service to the proposed project. The purpose and “synergy” of the bike path with the rail line was described on page 3-114 of the 2005 DEIR.
- B2-27 It is unclear what “induced” means in this context; to transportation planners, an induced trip is a person-trip that would not otherwise be made in the absence of adding an improvement. In SMART’s case, the number of induced trips is likely to be very small given experience in other transit systems. Such estimates would be highly speculative at best, for they require an assumption of what someone’s next-best alternative activity would be. For example, if Mr. Smith would stay home watching TV, but because of SMART decides to drive to a station and make a SMART trip, that is an induced trip. But if Ms. Jones would drive to the shopping center, but instead decides to take a trip on SMART, that is not so much a “new” trip as a “displaced” or “diverted” trip. In most cases, SMART rail service would result in diverting auto trips, which in turn would reduce VMT, even if the rider needed to drive or be driven to the station, because the “access” portion of the trip would only be a fraction of the overall trip.

- B2-28 The VMT reduction is based on some riders who change modes; for example, someone who would carpool or use transit, who switches to SMART, is not considered in the net reduction in VMT.
- B2-29 The new fuel efficiency standards for passenger vehicles are disclosed in DSEIR Section C.2.5.1. Increasing auto fuel economy from 27.5 miles per gallon (mpg) to 35 mpg represents an ability of autos to travel equivalent mileage using 79 percent of the fuel as compared to the earlier standards. The 2005 DEIR Table 3.8-5 and DSEIR Table C.3-8 show that it takes more than four times the direct energy use to move riders in passenger vehicles than in the heavy DMUs. This means that autos would need to consume less than 25 percent of the fuel as compared to the earlier standards, or achieve more than 110 mpg, to become superior in terms of energy use. See response B1-45 regarding the likelihood of alternative fuel buses or hybrid buses; these alternatives would not notably affect the relative performance of the Express Bus Alternative.
- B2-30 Contrary to the comment, the impact statement is appropriate as written; the supplemental analysis considers the impact of the total project as revised, that is, the proposed project with both weekday and weekend passenger rail service and discloses the incremental increase in GHG emissions that would occur on weekend days. The changes in emissions due to taking cars off the road are presented for weekend service as they were for weekday service in the 2006 FEIR in Tables 3.5-7 and 3.5-8 (i.e., negative symbols refer to emission reductions compared to the No-Project scenario). There are no BAAQMD standards for greenhouse gas (GHG) emissions, but the DSEIR shows that a net reduction would occur. As the comment notes, the reductions achieved with weekday service would continue to occur with the addition of weekend service. This enables an overall net reduction even though weekend service would add some GHG emissions during weekend days. No new table or figure is needed because the emission reductions are described in the text (DSEIR, pp. C.3-10 to C.3-11).
- B2-31 See response B2-22 regarding deadheading and regarding rail patrons who are diverted from buses and carpools. Emission estimates include train miles traveled such as for in-service operation, including to the maintenance facility. On weekends it was assumed that the net VMT reduction would be 60% of the person miles travel (PMT) reduction, due to switches from other modes. SMART is not proposing to operate shuttles or buses on the weekend although the stations would accommodate them. If shuttles or buses are used to access the stations, these would result in reduced auto trips to the stations, which would provide some additional quantity of emission reductions. Impact characterization for GHG is based on a comparison with the 2025 No-Project conditions, which are shown in the 2006 FEIR Tables 3.5-9 and 3.5-10.
- B2-32 The difference between alternatives with respect to air quality impacts was already analyzed in the 2005 DEIR (Sections 4.3 and 4.4) and 2006 FEIR. As discussed in Section D.2 of the DSEIR, the findings in the 2006 FEIR regarding how the proposed project compares to the alternatives are not substantially changed by adding weekend service or light DMUs. See response B2-31 regarding emissions of trains traveling for non-service. See response B1-45 regarding assumptions for deployment of advanced technologies in buses. See also response B5-27 regarding manufacturing buses and vehicles.
- B2-33 SMART service on weekends or at any other time would not be expected to induce trips. Rather, passengers using weekend service on SMART would most likely be diverted from other modes of transportation. Although speculative, if a small number of weekend passengers choose to use SMART for an excursion that would otherwise not occur (e.g., rail enthu-

siasts), there would be no significant change in the emissions caused by SMART or the energy used by SMART.

B2-34 Wetlands mitigation was developed in consultation with jurisdictional agencies during preparation of the 2005 DEIR and 2006 FEIR. The wetlands mitigation measure BR-5a identifies replacement at a *minimum* of 1:1 and states that replacement ratios of 3:1 may be required in some cases. It should be noted that there is very little new wetland impact associated with the project components studied in the SEIR.

B2-35 Although protection of existing biological resources, including oak trees, would be required as part of the construction plan and would be monitored during the construction phase, additional wording has been provided in the environmental compliance measures (Section B.4 of the DSEIR and Section 2.9 in the 2006 FEIR). See Section 3 of this FSEIR.

B2-36 Train horn noise was evaluated and appropriate mitigation identified in the 2006 certified FEIR. Because implementation of Quiet Zones requires the cooperation of local jurisdictions and cannot be guaranteed solely by SMART, the impact was identified as significant and unavoidable. Please see Master Response Q, page 3.2-44 in the 2006 FEIR for information on Quiet Zone process, feasibility, costs and implementation. Additional details are provided in Master Response 5 in this FSEIR. The 2008 SMART Funding Plan has expanded funds for Quiet Zones by a factor of three, with sufficient funding for the construction of over 30 rail crossings. SMART is implementing final engineering for the project and will work with local jurisdictions as they prepare applications for Quiet Zones. The implementation of Quiet Zones would eliminate train horn noise.

B2-37 SMART is not building a sound wall in San Rafael. The referenced sound wall is part of the Caltrans Gap Closure Project. Caltrans and its partner, the County of Marin, are replacing an original sound wall that was built to buffer the residential area from eight lanes of freeway noise.

A sound wall would not be appropriate in the vicinity of a station site in Hamilton because no significant noise impact was identified for that location other than the impact of train horn noise common to all locations near at-grade crossings (shown for Novato at Roblar Drive, Grant Avenue, and Olive Avenue in 2005 DEIR, Table 3.7-5).

B2-38 The 30-minute headways refer to the service frequency in SMART's operating plan described and analyzed in the 2005 DEIR and 2006 FEIR; this plan has not changed. The DSEIR explains the reason for applying this assumption in the cumulative analysis. The SMART track plan provides passing sidings (i.e., sections of double track) located to accommodate the bi-directional 30-minute service frequency (headway) envisioned for SMART. There are additional passing sidings (existing and proposed by NCRA) to accommodate the operation of freight trains, although operation of freight trains is likely to be limited to the hours when SMART's AM and PM peak period passenger service is not running. It will be the responsibility of the SMART train dispatcher to control track switches and signals to facilitate the on-time operation of the SMART passenger service, expedite the movement of freight trains through the shared section of the line from Cloverdale to Ignacio, and to hold or advance trains ad hoc as necessary. Storage of passenger trains in Cloverdale does not require freight trains to be off the track until the last passenger train arrives in Cloverdale.

B2-39 The 10 to 14% figure can be ascertained by examining the truck volumes on Highway 101 at the following Caltrans website: <http://traffic-counts.dot.ca.gov>, and clicking on the link to the

2006 truck volumes. Pages C.6-4 and C.6-5 explain that the incremental reduction in vehicle trips depends on the types of goods carried and whether they were formerly carried by trucks or not. In general, for merchandise, SMART has assumed that one freight railcar can carry the equivalent of two freight trucks. Using this assumption, freight operation at the levels identified in the NCRA Initial Study would result in the removal of up to 340 one way truck trips per day from Highway 101. The Caltrans truck counts on Highway 101 (available at the website noted above) indicate that large truck volumes at key locations (Marin-Sonoma Narrows and Cotati grade) vary from 2,400 to 3,500 on an average day. Taking 340 divided by 3,500 is 9.7%; 340 divided by 2,400 is 14.2%. It should be noted that the DSEIR's estimates of trucks offset by freight rail operations is conservative and may be less than NCRA's estimates based on more detailed information for its EIR (see comment and response A3-3).

The completion of the sentence referenced in the comment is, "...assuming NCRA's freight service projections in their Initial Study are realized." NCRA has stated, based both on the history of the NWPRR and NCRA's own business planning, that the railroad would carry primarily lumber and forest products; stone aggregate; feeds, grains, and other bulk products. These are, as the comment asserts, "...commodity products in carload lots," and are typically cheaper to carry by rail than truck.

B2-40 The DSEIR analysis assumes freight trains would carry heavy loads and would require dual locomotives on longer trains. The Novato Community Hospital and offices would be more than 100 feet from the passenger or freight service, which would be a sufficient distant to isolate these uses from any adverse cumulative vibration impacts (DSEIR p. C.6-15).

B2-41 It will be the responsibility of NCRA, not SMART, to ensure that solid waste is contained within the truck trailers to be used. As noted in the DSEIR, the freight operator has confirmed that truck trailers used for transporting solid waste on the rail line will be fully enclosed. Maintenance of the railroad right-of-way is discussed in the 2005 DEIR and 2006 FEIR.

**Comment Set B3**  
**Marín Citizens for Effective Transportation**

**Marín Citizens for Effective Transportation**  
✧ 15 Fairway Dr. ✧ Novato, Ca 94909

April 22, 2008

Lillian Hames  
SMART District  
4040 Civic Center Drive, Suite 200  
San Rafael, CA 94903

**Re: Comments on Draft Supplemental EIR**

Dear Lillian,

Here are the comments on the DSEIR, organized by topic.

**Weekend Service**

1. The claim that weekend service generates a net environmental benefit is dependent on how it is funded. Since trains operate on the margin at a deficit, they need to be subsidized by sales tax dollars.<sup>1</sup> Hence, regular weekend service would need operational subsidies in the form of sales tax revenues. Consequently, providing weekend service would mean providing less weekday service. Unless SMART is willing to claim weekend service would generate more riders per train than weekday service, such a subsidy amounts to shifting rail service from where it provides more environmental benefits to where it provides less.
  - Please provide evidence on how weekday service will not be sacrificed to provide weekend service to defend your claim that weekend service generates a net environmental benefit.
2. Ratios used in the DSEIR for weekend service appear difficult to justify. The comparison rail services travel through much higher population centers than SMART. For example, Caltrain serves San Francisco, with a terminal station across the street from AT&T park. San Francisco is a tourist mecca. There are about 100 trains operating on weekdays, 32 on Saturday and 30 on Sunday. By contrast, according to the DSEIR (Section C.3) SMART would provide only 4 roundtrips per day.
  - Given that ridership models indicate non-linear responses to frequency of service please justify Dowling's "back-of-the-envelope" use of ratios based on these other agencies.
  - Based on estimated riders per train, the DSEIR is projecting more riders per train on Saturdays than on weekdays. Given that SMART's weekday service is

B3-1

B3-2

<sup>1</sup> This would not necessarily be true for "excursion" or specialty trains where service costs are expected to be covered by collected fares.

**Comment Set B3, cont.  
 Marín Citizens for Effective Transportation**

largely focused on commute service, it is difficult to see how this would be true. Please provide some justification for this calculation.

B3-2 cont.

- Please fill in table 1 so that the public can determine for themselves the reasonableness of the weekend ridership projections.

B3-3

**Table 1. Ridership by Transit Agency**

*Please provide the following data:*

Agency	Avg Ridership			# of Trains			Population in Area of Operation
	Weekday	Sat	Sun	Weekday	Sat	Sun	
Coaster							
Metrolink							
Caltrain							
Rail Express							
Tri-Rail							
Capitol Corridor							
SMART	5,050	1,829 to 2,020	1,160 to 1,260	24	8	8	

Note: Table 2.5-1 in the DEIR states there will be 24 trains per weekday serving San Rafael. The WP#5 (Table 2.5-1) shows 28 trains in total with eight trains per day with significantly shorter routes. We chose to use 24 in this table.

**Quiet Zones**

3. Attached (see Attachment A) is a list of public at-grade crossings provided by the California Public Utilities Commission in Marín and Sonoma Counties. The DSEIR claims it will “work with” communities to qualify for Quiet Zones (QZs). However, to qualify as a mitigation strategy under CEQA, SMART is required to provide details on implementation of the mitigation strategies and, so far, SMART has provided very little information in the DSEIR or elsewhere. In addition, while your public pronouncements have claimed you have budgeted for QZs, you have never stated which QZs this budgeted amount is expected to cover, nor what the process is for communities who desire QZs to receive some of these funds, nor when the funds may be available.

B3-4

- Since your budget will not cover the cost of QZs for every at-grade crossing, please provide specifics on what “working with” communities means.
  - What is your plan for determining which QZs would be funded?
  - When would these funds become available?
  - Is SMART committed to covering liability coverage?
  - Has SMART committed at the time of this letter to any specific location for a QZ?
  - What is SMART’s strategy with regard to private at-grade crossings? What are the number and locations of private at-grade crossings on SMART owned track?

**Comment Set B3, cont.**

**Marín Citizens for Effective Transportation**

- What efforts has SMART made to inform individual city planners as to the impact of freight rail horn noise on the residents in the vicinity of the at-grade crossings? Please include residences planned as part of “transit oriented development” near the rail stations. B3-5
- How will noise from freight rail impact the noise pollution goals set forth in the general plans of the impacted cities? B3-6
- What are the number of households (by at-grade crossing on the attached list) that fall in the category of a significant noise impact? B3-7
- How many schools reside within distances of the at-grade crossings that would be “significantly impacted” by noise?
- How many hospitals may be impacted by rail horn noise?
- What information have you collected to date on required infrastructure to qualify for a quiet zone? Please provide information on any at-grade crossings you have evaluated to determine the type of infrastructure improvements necessary to qualify as a Quiet Zone. B3-8
- Are there any at-grade crossings that you believe will not qualify for a quiet zone without an overpass or underpass? B3-9
- What about the private at-grade crossings? What does SMART propose to do to mitigate the rail noise from these crossings. B3-10

**Non-horn Noise and Vibration Impacts**

4. Section C6 (page c.6-15) states, “Ground-borne noise and vibration along the SMART project route would substantially increase with the increase in NCRA proposed freight service.” We could find no evaluation of this impact for the speculative scenarios #1 and #2. Please provide. B3-11
5. The DSEIR identifies significant noise impacts in addition to those associated with train horns. B3-12
  - Using the table in Attachment A, what is the number of households by section impacted by these noises?

**Maximum Number of Freight Trains Operating Through Marín and Sonoma Counties**

6. Section C6 of the DSEIR describes Speculative Scenario #2 as the “Maximum Freight Service.” No information is provided to support this label as “maximum” and the information in the document contradicts it. For example, the DSEIR claims that in this scenario all but one train could be accommodated during the day. By definition, this means there is unused capacity at night, and more trains could theoretically be operated. In addition, since the freight operator is a private entity, there is no documented constraint on the operator’s ability to operate more than 16 trains per day, *if there is demand for these services*. Indeed, the only constraint appears to be associated with the maximum number of freight trains that could B3-13

## Comment Set B3, cont. Marín Citizens for Effective Transportation

operate in Sonoma and Marín counties, which is the physical capacity of the track. Finally, Mitch Stogner’s November 27<sup>th</sup> letter to Lillian Hames asks, “At what future date the **maximum** level of train traffic can be expected (to establish a future-conditions baseline).”? His answer is:

“Recognizing that **Full Operations** are entirely dependent on unknown market forces, they are currently projected to begin about **one year** after the commencement of operations and to extend indefinitely into the future.” (emphasis added)

- The DSEIR claims scenario #2 is “speculative,” implying that it is unlikely to happen. However, when the NCRA Executive Director responds to General Manager. Hames’ question as to when the “maximum” level of service will occur, he says it will occur in 12 months. This appears contradictory. Could you please clarify whether SMART and the NCRA are talking about scenario #2?
- What is the basis for claiming 16 trains is the maximum number of trains that could be operated on the track? Please ask the freight operator to provide you and the public with a written answer to this question.<sup>2</sup> Please clarify.
- What is the maximum number of freight trains that could operate during the weekday (24 hour period) if SMART is not approved by the voters? (Note: this question is a repeat of a question asked in MCET’s scoping letter.)

### Trucks vs. Freight Rail

Section C6 of the DSEIR attempts to make the case that freight rail removes trucks from the freeway and provides estimates about the removal of a percentage of truck traffic based on a “back-of-the-envelope” estimate. However, speculative scenario #2-- based on your verbal descriptions at the Novato DSEIR hearing – is associated with a proposed container port in Humboldt Bay. According to a recent study sponsored by the Transportation Research Board, “the average rail shipment is over 500 miles, whereas the average truck shipment is under 300 miles.”<sup>3</sup> In addition, if the 16 trains per day is a maximum number of freight trains that could operate through the Eel River Canyon, then by definition, a relatively larger number of containers would need to be shipped south by truck. In addition, footnote 8 (page C.6-7) states:

“Due to the speculative nature of this scenario, there is insufficient information on whether freight service to quarry operations, if they occurred, would result in a net decrease in truck traffic. While trucking from the quarry may not be an option, with a new source of aggregate, it is likely that trucking or barging of quarry materials from other areas into the region would decrease. Quantification of these potential events is not possible.”

- Since freight rail service to Eureka is a requirement for a container port to be located in Humboldt Bay, container ports generate large amounts of truck traffic

<sup>2</sup> Why didn’t SMART staff ask this question in earlier communications with NCRA staff? In addition at the April NCRA Board Meeting, Mitch Stogner claimed the interpretation of the May 11<sup>th</sup> memo was incorrect. (We have no idea whether he was referring to the 16 trains as the maximum number or that there would ever be this level.)

<sup>3</sup> Joseph Bryan, Glen Weisbrod, Carl D. Martland, and Wilbur Smith Associates, Inc., Assessing Rail Freight Solutions to Roadway Congestion: Final Report (October 2006), p. 9. Available on line at: [www.trb.org/NotesDocs/NCHRP08-42\\_FR\\_Rev10-06.pdf](http://www.trb.org/NotesDocs/NCHRP08-42_FR_Rev10-06.pdf)

B3-13 cont.

B3-14

B3-15

**Comment Set B3, cont.**  
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as well as freight traffic, and in light of the quarry activity above, wouldn't it be more accurate to say, "Quantification of the impact of this scenario on the volume of truck traffic is not possible without further study" ?

B3-15 cont.

- How many freight trips and what would the length of trains be if Island Mountain quarry is approved? Aggregate from Island Mountain quarry would be hauled in long trains and these speeds may be slower than 25 mph. How fast might they travel? What would be the delays at the at-grade crossings with trains filled with quarry and gravel mining materials?

B3-16

7. According to the same study sponsored by the Transportation Research Board<sup>4</sup>:

**"Rail is not always cheaper and more fuel efficient than truck: rail will not be cheaper for light density lines and rail will not be more fuel efficient for very short trains and cumbersome switching moves."**

B3-17

- Given that this statement is from a peer-reviewed, government sponsored report, please qualify statements in the DSEIR so that the public understands that SMART has not performed the type of analysis required to make such a broad conclusion regarding whether rail is more fuel efficient than trucks.
- Further reading of the cited TRB study also indicates that the calculation of whether freight reduces truck congestion in urban areas is very complicated and depends on many factors. It seems under the circumstances your "back-of-the-envelope" calculation is not supported by experts in the industry. Please cite any peer-reviewed study supporting the technique used in the DSEIR that support the claim that freight will remove trucks from the freeway in this situation.

B3-18

**Freight Trains and Night Time Operations**

8. The DSEIR claims most freight trains could be "accommodated" during daytime hours, as if you want the reader to think that since they can be accommodated during daylight hours, they will be. The DSEIR also states, "the freight operator may nevertheless opt to run freight trains at night for independent operational needs. This appears to be a summary of the following statement in the November 27<sup>th</sup> letter to Lillian Hames from Mitch Stogner, which states:

B3-19

"NWP Co. does not intend to schedule trains and no freight train schedules can be provided. NWP Co. does intend to operate trains at times and with the frequencies required so as to fully perform its common carrier obligations, and to conduct safe, timely, and efficient rail freight operations that provide adequate rail freight service to the shippers and receivers on the NWP Line."

- Given this evidence, we believe it would be more accurate to say that you have no idea when the freight trains will operate and, other than interfering with the operations of passenger trains, freight trains will operate in a manner that maximizes the interests of the freight operator.

<sup>4</sup> See footnote 3.

**Comment Set B3, cont.**  
**Marín Citizens for Effective Transportation**

- Please provide any evidence that will predict when freight operations will occur during the day or night. Does SMART have any right to keep freight trains from operating at night when passenger trains are not operating?
- Does the Operating Agreement between SMART and the NCRA provide for any limits on freight rail operations at night?
- If SMART is able to increase service beyond the service levels proposed in the FEIR, does SMART have the right to further restrict freight operational hours?

B3-19 cont.

B3-20

**Non-horn Noise and Vibration Impacts**

9. Section C6 (page c.6-15) states, “Ground-borne noise and vibration along the SMART project route would substantially increase with the increase in NCRA proposed freight service.” We could find no evaluation of this impact for the speculative scenarios #1 and #2. Please provide.

B3-21

**Hamilton Ridership Projections**

10. The DSEIR (Table C.5-6) compares new ridership projections for the Hamilton station with the ones contained in the FEIR for Los Robles. These projections are based on different methodologies, using different information for the projections. For example, at this time you do not have detailed Census 2000 data on where people who work at Hamilton live, nor where people who live at Hamilton work.

B3-22

- Please ask the consultant to re-run the numbers for the Los Robles site so the Novato City Council has the same basis for comparison.
- Originally, the Los Robles site was to accommodate employees at Bel Marin Keys. The Hamilton site makes this commute more inconvenient for them as well as for residents of south Novato living in Ignacio who were projected in 2006 to take the train to work. What is the loss of ridership associated with moving the station from Los Robles to the alternative site at Hamilton?

**Estimated SMART Greenhouse Gas Reduction**

11. The DSEIR states that “Updated baseline information from EMFAC2007 indicates that the benefit achieved by the SMART project by taking cars off the road may not be as large as identified in the 2006 FEIR”. It also states “One of the most substantial advantages is that it (the proposed SMART project) would result in a net reduction of greenhouse gas emissions in the region through reduction in VMT” (ref. page D-2, D.3 Environmentally Superior Alternative).

B3-23

- The SEIR indicates that the proposed SMART project would lead to a reduction in CO<sub>2</sub> emissions in 2025 of 124,000 pounds per weekday. (ref page C3-11, Impact AQ-3). With 254 non-holiday operating weekdays per year, the SMART greenhouse gas reduction of 124,000 pounds per weekday equates to 31.5 million pounds per year or 15,750 tons per year.

**Comment Set B3, cont.  
Marin Citizens for Effective Transportation**

- Both Marin and Sonoma County have conducted greenhouse gas emissions inventories. Table 2 presents estimates of annual greenhouse gas emissions in each county in 2000.

B3-23 cont.

**Table 2.  
Greenhouse Gas Emissions Inventory, Year 2000 (eCO<sub>2</sub> units)**

Source	Marin County (eCO <sub>2</sub> tons/year)	Sonoma County (eCO <sub>2</sub> tons/year)	Total (eCO <sub>2</sub> tons/year)
Electricity & natural gas	1,375,078	1,804,158	3,179,236
Transportation (mobile)	1,649,116	1,589,000	3,238,116
Agriculture	183,462	425,040	608,502
Solid waste	-94,091	-78,818	-172,909
<b>Total GHG emissions</b>	<b>3,113,565</b>	<b>3,739,380</b>	<b>6,852,945</b>

County of Marin Greenhouse Gas Emissions Analysis Report, June 2003.  
Greenhouse Gas Emission Inventory for All Sectors of Sonoma County, California, Climate Protection Campaign, January 2005

- In summary, the SMART project reduction in annual greenhouse gas emissions for 2025 is estimated at 15.75 thousand tons per year. Total annual greenhouse gas emissions for Marin and Sonoma counties in 2000 were 6.8 million tons. SMART’s greenhouse gas reduction equates to 0.2% of year 2000 emissions. Is SMART’s calculation correct?

**Issues Not Covered in the DSEIR Related to Cumulative Impacts**

12. The Prop. 65 Warning issued by existing freight operators states in part:

“Railroad locomotives and related equipment used in transporting goods and passengers are powered by diesel engines and emit diesel exhaust. Diesel exhaust is a chemical known to the State of California to cause cancer, and contains chemicals known to the state to cause birth defects or other reproductive harm.”

B3-24

- The DSEIR does not mention birth defects or reproductive harm.. In addition, the impacts it does analyze are limited by confining the analysis to 16 freight trains per day. What would these impacts be with the maximum number of freight trains operating on the track? How would cancer risks rise with the maximum number of freight trains operating on the track?
- As the DSEIR claims, diesel fumes from trains tend to be concentrated. How will diesel fumes impact air quality in nearby residences? How will this affect individuals with respiratory problems living in impacted residences? How many people is this estimated to impact in Scenario #2?
- Trains operating at night will have medical and psychological effects on impacted residents due to sleep loss. Please describe these impacts in detail.

B3-25

B3-26

## Comment Set B3, cont. Marin Citizens for Effective Transportation

13. The DSEIR does not mention the impact of freight rail noise at night on property values. According to a published, peer-reviewed study, freight rail noise has a significant and measurable negative impact on property values.<sup>5</sup> What are these impacts and what are the impacts on the property values of residential properties identified as those “significantly impacted by rail noise” ? **B3-27**
14. The DSEIR argues that 60-car long trains traveling at 25 mph could cause delays at at-grade crossing of 3 minutes.<sup>6</sup> Yet, it provides no evaluation on each of the communities regarding response times of emergency vehicles where access would be delayed by freight trains. **B3-28**
- Which neighborhoods would be impacted by reductions in response times of emergency vehicles and what types of emergency services would this impact? **B3-29**
  - Some at-grade crossings are so close together that there could be cumulative delay. Please identify at-grade crossings that are closer together than a 60-car train. **B3-29**
  - If a 60 car freight train stalls in Novato in some locations it will block several at-grade crossings. Please describe in detail contingency plans and describe how the freight train would be moved, and how long it would take to move it out of the SMART owned right of way. Please include any contingencies for the provision of emergency services for residences or businesses with blocked access. **B3-30**
  - Please identify other locations along SMART owned track where 60 car long trains that are stalled may impact access to the impacted neighborhoods. **B3-30**
15. The DSEIR does not evaluate growth-inducing impacts associated with a significant increase in freight traffic associated with a container port. Please describe these impacts. **B3-31**
16. What is the maximum length of freight train that could conceivably operate in Marin and Sonoma counties? **B3-32**
17. Several cities in Sonoma county have either started or built residences in higher densities near SMART train stations (a.k.a. “TODs”). Some of these are near at-grade crossings. **B3-33**
- What will be the noise impacts on the desirability of these residences associated with train horns?

<sup>5</sup> Simons, Robert A. and Abdellaziz El Jaouhari, “The Effect of Freight Railroad Tracks and Train Activity on Residential Property Values” *Appraisal Journal* (Summer 2004).

<sup>6</sup> We assume this is based on the November 27<sup>th</sup> letter from Mitch Stogner to Lillian Hames.

Comment Set B3, cont.  
Marin Citizens for Effective Transportation

Sincerely,

*Mike Arnold*

*Joy Dahlgren*

Mike Arnold  
Co-chair, MCET

Joy Dahlgren  
Co-chair, MCET

Comment Set B3, cont.  
 Marin Citizens for Effective Transportation

**Attachment A.**  
**CPUC List of Public At-grade Crossings in Marin and Sonoma Counties**

Street	City
SR 101/37	NOVATO
HANNA RANCH ROAD	NOVATO
PED CROSSING	NOVATO
GRANT AV	NOVATO
OLIVE AV	NOVATO
RUSH CREEK PL	NOVATO
STONETREE LANE	NOVATO
UNKNOWN	SAN RAFAEL
RICE DRIVE	SAN RAFAEL
IRWIN ST	SAN RAFAEL
W FRANCISCO BL	SAN RAFAEL
2ND ST	SAN RAFAEL
3RD ST	SAN RAFAEL
LINCOLN AV	SAN RAFAEL
4TH ST	SAN RAFAEL
FRANCISCO BL	SAN RAFAEL
5TH AV	SAN RAFAEL
MISSION ST	SAN RAFAEL
LINDARO ST	SAN RAFAEL
PACHECO ST	SAN RAFAEL
PALOMA AV	SAN RAFAEL
N SAN PEDRO RD	SAN RAFAEL
LAS GALLINAS AV	SAN RAFAEL
CIVIC CENTER DR	Marin-Uninc
SMITH RANCH RD	Marin-Uninc
Roblar	Marin-Uninc
AIRPORT RD	CLOVERDALE
FIRST ST	CLOVERDALE
E COTATI AV	COTATI
FRONT ST	HEALDSBURG
HEALDSBURG AVE	HEALDSBURG
W MATHESON ST	HEALDSBURG
W NORTH ST	HEALDSBURG
W GRANT ST	HEALDSBURG
DRY CREEK RD	HEALDSBURG
CHIQUITA RD	HEALDSBURG
BAYWOOD ST	PETALUMA
PETROLEUM AV	PETALUMA
JEFFERSON ST	PETALUMA

**Comment Set B3, cont.  
Marín Citizens for Effective Transportation**

Attachment A (cont.)

Street	City
E D ST	PETALUMA
WASHINGTON ST	PETALUMA
LAKEVILLE ST	PETALUMA
W. PAYRAN ST	PETALUMA
SOUTH POINT BL	PETALUMA
SOUTHWEST BL	ROHNERT PARK
PED XING	ROHNERT PARK
ROHNERT PK EXPY	ROHNERT PARK
GOLF COURSE DR	ROHNERT PARK
SEBASTOPOL AV	SANTA ROSA
W 3RD ST	SANTA ROSA
W 6TH ST	SANTA ROSA
W 7TH ST	SANTA ROSA
W 8TH ST	SANTA ROSA
W 9TH ST	SANTA ROSA
ROSELAND AV	SANTA ROSA
W COLLEGE AV	SANTA ROSA
GUERNVILLE RD	SANTA ROSA
W STEELE LN	SANTA ROSA
PINER RD	SANTA ROSA
SAN MIGUEL RD	SANTA ROSA
N MCDOWELL BL	Son-Uninc
CORONA RD	Son-Uninc
ELY RD	Son-Uninc
PETALUMA HILL RD	Son-Uninc
ADOBE RD	Son-Uninc
E RAILROAD AV	Son-Uninc
SCENIC AV	Son-Uninc
TODD RD	Son-Uninc
W ROBLES AV	Son-Uninc
STANDISH AV	Son-Uninc
BELLEVUE AV	Son-Uninc
HEARN AV	Son-Uninc
BARHAM AV	Son-Uninc
ROBERTS AV	Son-Uninc
FULTON RD	Son-Uninc
RIVER RD	Son-Uninc
AIRPORT BL	Son-Uninc
AVIATION BLVD	Son-Uninc
SHILOH RD	Son-Uninc
MITCHELL LN	Son-Uninc

**Comment Set B3, cont.**  
**Marin Citizens for Effective Transportation**

Attachment A (cont.)

Street	City
WINDSOR RIVER BL	Son-Uninc
STARR RD	Son-Uninc
LIMERICK LN	Son-Uninc
GRANT AV	Son-Uninc
BAILHACHE AV	Son-Uninc
LYTTON STATION RD	Son-Uninc
GEYSERVILLE RD SR128	Son-Uninc
MERRILL ST	Son-Uninc
WOODS LN	Son-Uninc
WASHINGTON SCHOOL RD	Son-Uninc
MCCRAY RD	Son-Uninc
GRANDVIEW AV	Son-Uninc
SR 37	Son-Uninc
SR 121	Son-Uninc
8TH ST EAST	Son-Uninc
DRAKE HILL RD	Son-Uninc
SR 36	Son-Uninc
SKAGGS ISLAND RD	Son-Uninc
SONOMA HWY SR 121	Son-Uninc

## Responses to Comment Set B3 Marín Citizens for Effective Transportation (MCET)

B3-1 SMART has received numerous requests for weekend service over the last several years. In response to these requests SMART has proposed four round trip weekend trips for Saturday and Sunday. The funding for this plan is outlined in SMART's Funding Plan, May 2008. The allocation of funds for weekend service does not require that weekday service be reduced and SMART is not proposing a reduction in its planned weekday service.

B3-2 See response B1-14. The SEIR preparers disagree with the statement that "comparison rail services travel through much higher population centers than SMART." For example, the comparisons with a majority of the other areas — 4 out of 7, including San Diego, Metrolink Inland Empire–Orange County, Dallas–Ft. Worth, and South Florida — have population densities and urbanization that, along the rail tracks, are probably lower in most areas than SMART would traverse. It should be noted that the ridership figures were collected in February 2007, so there were no Giants games at AT&T Park.

With regard to why ridership *per train* is higher on weekends than weekdays, this has to do with the elasticity of demand for the service with respect to the frequency of service. For example, doubling the service (for example, going from 4 trains, to 8 trains a day) would probably increase ridership by less than double; therefore, increasing the number of trains actually decreases the number of riders per train. Also, on weekends, it is possible that trip lengths would be shorter than on weekdays, when the preponderance of trips would be longer, commute trips. This would allow for more "turnover" of the same seat during the course of a train trip. Appendix 2 of the DSEIR does show the service levels (i.e., number of trains) provided on weekends.

We note that recently released information (April 10, 2008) by Caltrain indicates that although average weekday ridership increased 9.3 percent from 2007 to 2008, Sunday ridership increased by more than 25 percent.<sup>2</sup>

B3-3 The requested information was provided in the DSEIR's Appendix 2 – Transportation Technical Issues. It is not clear why the "population in area of operation" would be relevant, since the result needed is to determine the ratio between the weekday and the weekend ridership. Presumably, areas with greater population have greater ridership, both on weekdays and weekends.

B3-4 See response B2-36 and Master Response 5 regarding Quiet Zones.

B3-5 The 2005 DEIR, 2006 FEIR, and the DSEIR (all of which address cumulative impacts) were sent to every jurisdiction and planning agency throughout the study area to ensure that city and county planners are informed of potential impacts.

B3-6 See response A1-12 regarding the SMART project's consistency with local general plan noise standards. Noise from freight service would cause a significant cumulative impact as identified in the DSEIR Section C.6.4 (pp. C.6-12 – C.6-15). NCRA's proposed project's consistency with local general plans will be analyzed in NCRA's EIR.

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<sup>2</sup> See Caltrain, "Key Findings February 2008 Caltrain Annual Passenger Counts," final, April 10, 2008.

- B3-7 Train horn impacts from the proposed SMART passenger rail project are quantified and shown in the 2006 FEIR in Impact N-5. Due to the greater noise levels of longer freight trains, the geographical area of cumulative train horn impact would likely be larger than for passenger rail. Other sensitive land uses (e.g., schools and hospitals) near the rail line would be similarly affected by train horn noise. Regardless of the number of affected land uses, implementation of quiet zones would eliminate the impact.
- B3-8 See Master Response 5 regarding Quiet Zones.
- B3-9 See Master Response 5 regarding Quiet Zones.
- B3-10 This is a comment on the adequacy of the 2006 FEIR and not on the adequacy of the DSEIR's environmental analysis. See Master Response 1. See the previous 2006 FEIR and Master Response 5 in this Final SEIR regarding quiet zones.
- B3-11 The noise effects of freight trains under the speculative scenarios are described in general terms in the DSEIR Section C.6.4.2 (p. C.6-16). Consistent with the analysis of the cumulative vibration impacts of NCRA's proposed level of service on page C.6-15, freight trains under the speculative scenarios would generate vibration levels that could exceed the applicable FTA criteria. As described in the DSEIR, the speculative scenarios do not represent reasonably foreseeable cumulative impacts. In addition, more detailed analysis of freight's likely vibration effects is the responsibility of NCRA as the lead agency for the freight project and will be analyzed and mitigated in the freight project EIR. Because SMART's contribution to the impact would be negligible and less than the applicable FTA significance criteria, SMART's contribution to the vibration impact would not be cumulatively considerable.
- B3-12 The DSEIR in Section C.6.4.1 identifies the extent of the significant cumulative noise impacts of freight train pass-bys for all locations (Impact N-6). The comment refers to a list of at-grade crossings, which is relevant primarily to the train horn noise impact. As noted in the DSEIR, SMART train pass-bys would not exceed the noise significance criteria at any sensitive receptors along the tracks. DSEIR Table C.6-1 provides sufficient information regarding the extent of the cumulative impact from train pass-bys; additional detail regarding noise impacts from freight trains would be made available in the environmental document prepared by NCRA.
- B3-13 As explained in Section B.3 of the DSEIR, Speculative Scenario 2 describes the maximum freight operations that have been forecast in any long-range NCRA planning document. The additional information requested in the comment regarding maximum capacity is beyond the scope of SMART's DSEIR; see also response B2-18 and Master Response 2.
- B3-14 There is no question that the average rail distance for goods shipped is relatively long — 500 miles is probably correct. The analysis is the same regardless of where the trains originate. Truck traffic caused by development of the Port of Humboldt would not be a cumulative impact associated with the SMART project because the SMART project would not contribute to this impact. Furthermore, if freight rail service were in place, it could reduce the overall number of trucks on the highways. But again, this would not be an impact associated with the SMART project. Regarding the footnote 8 on page C.6-7, the SMART analysis does not assume truck offsets associated with speculative future quarry activity. This is a conservative approach and the footnote mentions that, although not calculated into the analysis, it is likely that there would be some truck offsets due to the availability of quarry material by rail that would otherwise be trucked or barged into the area.

- B3-15 It is reasonable to assume that some truck traffic will be avoided by implementing freight service. The DSEIR uses conservative estimates of truck traffic that may be removed. These are *estimates* only. Freight train trips in Speculative Scenario #2 may be generated by several different sources. It is neither the intent nor within the scope of the DSEIR to identify the precise sources of freight train trips (see Master Response 2). Rather, the focus of the SEIR is to analyze the cumulative impacts on the SMART rail corridor of increased freight trips, if service levels increased over time.
- B3-16 DSEIR Section B.3 describes freight train number and length assumptions for the speculative cumulative scenarios, in which aggregate may be hauled by the freight operator. See Master Response 2 regarding cumulative impact scenarios. Because of their weight, it is likely that aggregate trains would be restricted to, perhaps, 40 mph. At-grade crossing delays are addressed in DSEIR Section C.6 in the transportation analysis. Additional details are in DSEIR Appendix 2. As noted in the DSEIR, the cumulative impact at at-grade crossings would not be significant and SMART’s contribution would not be cumulatively considerable. Additional detail regarding speculative impacts to which SMART would not make a significant contribution is not warranted. See also response A1-18.
- B3-17 This appears to be a misinterpretation by the commenter of what the TRB report says. The statement in the TRB report means that when rail is less efficient than truck, rail transport will not be chosen as the preferred mode by shippers. In other words, policymakers should understand that there is not *always* an efficiency gain by shifting freight from truck to rail, or vice versa. Also, this statement was made before diesel prices were \$5 per gallon.
- B3-18 The transportation specialists who prepared the SEIR believe the TRB study adequately supports the notion that freight rail would reduce truck travel on Highway 101. The comment apparently makes the invalid assumption that all new rail freight traffic would be “induced demand.” It is possible that the railroad (NCRA) could carry some goods that would not otherwise be exploited, but most goods — e.g., existing lumber products, feed, agricultural products, etc. — would likely be diverted from truck to rail.
- B3-19 See response A1-3; see also Master Response 2.
- B3-20 See response A1-2 regarding SMART service levels. See response A1-3 regarding freight service operations. SMART will work with NCRA to determine appropriate freight service hours that allow NCRA to move freight along that portion of the corridor owned by SMART, consistent with SMART’s rights and NCRA’s easement, which makes freight operations subordinate to regularly scheduled passenger commute operations. Although increases are not currently planned, any increase in SMART service levels would also be regularly scheduled passenger commute operations and would also have priority over freight.
- B3-21 See response to comment B3-11.
- B3-22 It is unclear what “re-running the numbers” for the Los Robles (Roblar Drive) site would do. The projected ridership of this site was shown in Table C.5-6. There is no new information available to update this at present. See Master Response 3 for information on why this ridership estimation methodology was chosen. Moving the site to Hamilton involves a net gain in riders as shown in Table C.5-6, not a net loss as stated in the comment. The analysis used the Roblar Drive ridership as a “pivot point” (starting point) from which the other station’s ridership was developed; this technique has been widely used in transportation planning in the past 30+ years.

B3-23 The comment addresses the conclusions of the certified 2006 FEIR and is not a comment on the adequacy of the analysis in the DSEIR.

The comment shows estimates of the Marin and Sonoma County greenhouse gas inventories for year 2000. Impact characterization is based on a comparison with the 2025 No-Project conditions, not with those of 2000. Conducting the comparison in the 2025 scenario ensures that the future emissions performance of the motor vehicle fleet is taken into account, because the fleet will be cleaner in future years. The GHG emissions from motor vehicle traffic (part of the transportation sector) in the 2025 No-Project conditions and the avoided emissions with the passenger rail service are shown in the 2006 FEIR Tables 3.5-9 and 3.5-10 (p. 4-37). As noted in the text preceding these tables, the project would reduce motor vehicle emissions in the district by about 1 percent.

B3-24 Proposition 65 requirements are distinct and separate from CEQA requirements. If freight rail operations become subject to the provisions of Proposition 65, appropriate warnings will be provided, as required by law. This would be an applicable regulatory requirement, rather than a mitigation measure.

In DSEIR Section C.6.3, the increased cancer risks are described and quantified where possible without speculation. The comment asks for additional information regarding speculative levels of freight service; as explained in the DSEIR and Master Response 2, this is beyond the scope of the analysis of reasonably foreseeable cumulative impacts required by CEQA. It is important to note that NCRA is in the process of preparing its own EIR to evaluate the environmental impacts of freight service, including its contribution to adverse health risks.

B3-25 The project-level and cumulative impacts, including health impacts, of diesel emissions associated with the SMART project are adequately analyzed in the 2006 FEIR, as supplemented by the DSEIR. As explained in the DSEIR, quantification of the adverse impacts that might occur under Speculative Scenarios 1 and 2 is not possible without undue speculation.

B3-26 Adverse medical and psychological effects of noise are identified in the 2005 DEIR Section 3.7.1, including revisions in the 2006 FEIR. The additional noise from freight rail service, including nighttime pass-bys, is identified in DSEIR Section C.6.4. SMART does not propose nighttime service.

B3-27 A review of impacts on property values is not a requirement of CEQA. Secondly, it should be noted that train horn noise can be mitigated through the establishment of Quiet Zones, as discussed in the SMART 2006 FEIR.

For the record, the study cited in the comment reviewed freight rail lines with traffic of up to 75 trains per day, with 15-30 being “typical.” The study examined service on the combined CSX-Norfolk Southern-Conrail lines in Cleveland whose scale bears little resemblance to the service being proposed by the NCRA (even when speculative scenarios are included).

Moreover, a key thrust of the study was to examine the effect on property values before and after heavy media coverage of a freight railroad merger and consolidation plan. Before the media coverage, results showed no impacts from freight noise with a high degree of confidence (95%). With lower degrees of confidence (85%) there were very small (less than 0.1 % of value per train) impacts that were both negative *and positive*. After the coverage, the study found negative impacts with a high degree of confidence (95%) but only on units less than 1,250 square feet within 750 feet of the rail line. The loss was approximately 2/10 of 1% of value per train.

Importantly, the study found very large premiums for proximity to rail transit stations. The study states that for smaller units, proximity to a station yielded a positive value from 13-15% that was statistically significant at a 99% level of confidence.

- B3-28 The cumulative impact of passenger and freight operations on crossings, including emergency response times, was fully analyzed in the 2006 FEIR, supplemented with additional information on pages C.6-5 – C.6-7 of the DSEIR. The cumulative impact of freight and passenger operations will not be significant for the reasons identified in the 2006 FEIR. This comment requests additional analysis of project-level impacts of NCRA’s proposed freight service. The comment is outside the scope of the SEIR and should be addressed to NCRA, the lead agency for the freight project. See Master Response 2 for additional clarification of this issue. It should be noted in most cases cities along the line have emergency services on both sides of the track, and/or have crossings that are grade separated over the tracks (therefore causing no blockage). See also response A1-18.
- B3-29 See response B3-28. A 60-car freight train would have two, completely independent locomotives. If one failed, the other could move the train, albeit at a lower speed. NCRA has also committed to purchase new locomotives, which are much less prone to failure than older, used locomotives are.
- B3-30 See responses B3-28 and B3-29.
- B3-31 The growth-inducing effects of increased freight traffic associated with a container port in Humboldt Bay are not within the scope of SMART’s DSEIR. SMART is not the public entity proposing rail freight service or the container port, and SMART’s proposed passenger rail operations would not be cumulative with any freight operations north of Cloverdale. See Master Response 2. Any growth-inducing effects of rail freight service will be addressed in NCRA’s EIR on its proposed project. The growth-inducing impacts of the container port would be addressed in that project’s environmental review process.
- B3-32 Maximum expected freight train lengths (cars per train) within the SMART corridor between Cloverdale and the Ignacio Wye are identified in the DSEIR in Section B.3. This is 60 cars plus two locomotives. To estimate a “maximum conceivable” freight train length would be speculative.
- B3-33 The DSEIR identifies the significant unavoidable impacts of train horn noise due to weekend passenger service (under Impact N-5, Section C.3.4) and due to foreseeable freight service (Section C.6.4.1) for land uses near at-grade crossings, including sensitive transit oriented development. Based on the results of the peer-reviewed study by Robert Simons and Abdellaziz El Jaohari, “The Effect of Freight Railroad Track and Train Activity on Residential Property Values” cited by MCET in its comments, the effect of a rail station on residential property within 1000 feet could be a premium of 13-15%, even with levels of freight traffic that far exceed the potential freight traffic level contemplated in this SEIR. This is consistent with information provided in Master Response T in the SMART FEIR, which cited a number of peer-reviewed studies showing premiums for homes near commuter rail stations.

Comment Set B4  
Transportation Solutions Defense and Education Fund

Transportation Solutions Defense and Education Fund

P.O. Box 151439 San Rafael, CA 94915 415-460-5260

April 22, 2008  
By Hand Delivery

Lillian Hames, General Manager  
SMART  
750 Lindero St., #200  
San Rafael, CA 94901

Re: Draft SEIR Comments

Dear Lillian:

The Transportation Solutions Defense and Education Fund, TRANSDEF, is pleased to offer its comments on the Draft Supplemental Environmental Impact Report (DSEIR) on the SMART project. We are especially pleased to see the clarity with which the DSEIR divides the complex subject of cumulative impacts into those which are relevant to SMART's environmental review, and those that are not. We find the DSEIR adequately addresses the environmental impacts of the project, with the exception of the issue of the Southern Novato station. These written comments supplement the oral comments offered at the two SEIR hearings.

Southern Novato Station

The policy context for selecting Novato station sites is incomplete, in that the City of Novato has not yet recognized the need to plan for access by means other than the automobile. As a result, there are no sites available that would allow a fully functional bus station to be co-located with a rail station. The possibility of providing transit connectivity similar to what San Rafael's downtown will offer has been lost, because the potential sites have already been developed with grocery stores.<sup>1</sup>

That said, SMART does need to consider planning possibilities the City may not have considered, as SMART evaluates the best way to serve a city that is not yet transit-friendly. This environmental review will then serve to inform the City's own decisionmaking process.

For guidance, the SEIR needs to go back to the first principles of urban design: that transit best serves highly concentrated activity zones. The stimulation Downtown development would receive from good rail access would give the City Council the opportunity to shape the Downtown into just such a concentrated and lively area, only without the traffic concerns of conventional suburban development.

<sup>1</sup> SMART is not responsible for the failure to plan, nor is this an issue SMART needs to mitigate.

B4-1

Comment Set B4, cont.  
Transportation Solutions Defense and Education Fund

TRANSDEF

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Page 2

TRANSDEF believes the following steps are required to produce an adequate and useful SEIR:

1. Review the Novato General Plan and Downtown Plan to see whether the City intends to intensify its Downtown. It is inadequate to merely find that the Downtown site is "supportive of existing commercial and residential uses in the nearby area." (page C.5-15) The important policy question the SEIR needs to reach is whether a Downtown station would assist the City in achieving--or perhaps even surpassing--its land use goals for the Downtown. B4-2
2. Evaluate the potential for densification of Downtown beyond current planned levels that is made possible by providing rail service to Downtown, and the benefits to the City's land use and transportation gained by so doing, should the City Council decide to take advantage of the opportunity. Assume in this analysis the pedestrian and bus access to the station described in #6 below. Could an intensified walkable mixed use Downtown give the City enough activity focus to make widespread citywide use of transit feasible, with its corresponding reduced driving, reduced dependence on fossil fuels, reduced energy consumption and reduced GHG emissions? If Novato's future growth were concentrated Downtown, would this, in general, result in net environmental benefits? Explain. B4-3
3. Assuming the City does intend to intensify the Downtown, evaluate the transportation benefits to SMART that would come from an alternative with only one station in Novato--a Downtown station. Would one less station speed up service along the SMART line enough to make a noticeable difference? Would operating costs be reduced, or trip times be reduced significantly, as a result of the higher speeds attainable? A single Novato station would be served by shuttles to Fireman's Fund and Hamilton, as well as some neighborhoods. Evaluate the additional operating cost needed to provide a North Novato shuttle and extend the Hamilton shuttle to downtown. B4-4
4. Would the designation of only one station in Novato--Downtown--send a stronger message that the City intends to focus its growth Downtown than if two stations were designated? What impact would that decision have on future land use? B4-5
5. Evaluate an alternative with a Novato Downtown and a Hamilton station. How would they function together, with a shuttle provided to Fireman's Fund? Would these two stations be better for the future of land use in Novato than if Novato North and Hamilton stations were implemented? B4-6
6. Provide the plan for the approved Whole Foods Market complex, and show the pathway pedestrians will take to get to a bus stop on DeLong. Evaluate the possibility of constructing a set of stairs to enable pedestrians to get up to the elevation of DeLong from the level of the station site and Whole Foods. The stairs (if not already included in the Whole Foods plan) would connect to the closest point on DeLong, to which the Reichert Ave. bus stop could be moved. What would be needed for pedestrian safety if the stop across the street were moved to be directly opposite the Whole Foods/SMART station stop? B4-7

Comment Set B4, cont.  
Transportation Solutions Defense and Education Fund

TRANSDEF

4/22/08

Page 3

Comments and Suggestions

The following comments, keyed to DSEIR page numbers, are intended to correct errors and omissions, or supplement the draft text to make it more readable. These comments do not affect the adequacy of the document.

B-14: Is there to be a PUC-approved bicycle/pedestrian at-grade crossing of the tracks near North Hamilton Parkway? What would be the grade of the pathway as it transitions up from the tracks?

B4-8

B-18: The image representing the train looks way too similar to a bus. I mistook it for a bus, and could not figure out where the tracks were. The tiny symbols for cars got lost, rendered in black and white. Can you at least add text to call out the train and tracks, if not redesign the graphics? Clarify the ADA access from the Main Gate Rd. bus drop-off to the station.

B4-9

B-20: The discussion of speculative impacts would benefit from distinguishing between NCRA's intent, as expressed in its documents, and the likelihood of such speculative scenarios coming to pass, due to the extraordinary obstacles involved.

B4-10

B-21: State that Shared Use of the tracks by SMART and freight assumes FRA-compliant vehicles.

B4-11

B-23: Need to restate in B.3.4 that the FRA is now considering major changes to the regulatory environment that currently requires time separation between light and heavy rail vehicles. With Positive Train Control, FRA permission could conceivably allow freight and SMART trains on the track at the same time.

B4-12

B-23 FN 9: Please verify whether use of the term "maximum capacity" was in error. It appears that the intent of the sentence is to identify "the maximum level of freight operations" --the number of trains the NCRA could conceivably have a business reason to run. This is a very different number than the absolute total number of trains that could be run on the tracks, were there adequate funding. This latter number would be a function of the speed of the trains and the minimum separation allowable between trains. That is what would correctly be called "maximum capacity."

B4-13

C.2-3: The Federal NAAQS for ozone recently changed. Also, BAAQMD has not yet started an update of the Clean Air Plan, so it will not be complete "in early 2008."

B4-14

C.2-4: The 2006 24 hour PM2.5 levels in Table C.2-4 clearly exceeded the NAAQS. Why is the Days over Federal Standard shown as NA?

B4-15

C.3-5: Passengers could arrive at a rail station by ferry.

B4-16

Comment Set B4, cont.  
Transportation Solutions Defense and Education Fund

TRANSDEF

4/22/08

Page 4

C.3-12: A serious flaw in the presentation of the DSEIR was its failure to explain the context for the calculation of excess cancer cases. It needs to be stated wherever a figure for cancer cases is cited that this is the incidence of cancer after a 70 year exposure at x distance from the tracks. In addition, clarification is needed as to whether the calculation assumes 24 hours-a-day exposure for those 70 years. It should further be stated as to whether the cancers involve locations where freight trains idle for extended periods. The same comment applies to C.6-8 and C.6-10.

B4-17

C.3-16: The text is incorrect when it states "As travel by commuter rail is safer than by motor vehicle, weekend service may slightly decrease the overall accident rate per vehicle-mile traveled in the counties on weekends." The accident rate would not change. The total number of accidents might decrease slightly as VMT drops slightly.

B4-18

C.4-5: The analysis of safety should distinguish between light DMUs operating with time separation, and light DMUs operating with Positive Train Control. In the latter case, train-train collisions would become far less likely, due to advanced techniques for keeping trains apart.

B4-19

C.5-1: The phrase "derived from GIS mapping" misleads the reader into thinking that the Census data come from the GIS. In fact, the GIS is merely a way to conveniently access the Census data. A more accurate phrase would be "extracted using GIS mapping."

B4-20

C.5-33: Provide a map and information from the approved Hamilton master plan for the commercial site "Hamilton Town Center." Evaluate the compatibility of the station area plan with the master plan.

B4-21

C.6-2: The assumption of 30-minute headways between trains is overly limiting for a system with Positive Train Control. Please evaluate how changing this assumption to a more appropriately aggressive one would affect the number of nighttime freight trains under the various scenarios. Providing an operational chart of a schedule showing 15 minute headways would help readers better understand railroad operations.

B4-22

C.6-4: The last sentence on the page is awkward in structure, because of the use of percent for two different kinds of circumstances: percent grade and percent of traffic comprised of trucks. Insert the parenthetical phrase "with trucks making up 5 - 6% of highway users."

B4-23

C.6-7: Restate that the cumulative impacts result from the freight trains, and not from SMART operations.

B4-24

Comment Set B4, cont.  
Transportation Solutions Defense and Education Fund

TRANSDEF

4/22/08

Page 5

C.6-9: The EPA Locomotive rule was recently made final. Compare this standard with the State's Off-Road standard.

B4-25

C.6-15: Delete the "and" in the last sentence of the Train Horn Noise paragraph.

B4-26

C.6-20: Insert a statement that scheduling for freight and light DMU passenger operations would be considerably easier if the FRA approves a SMART implementation of PTC.

B4-27

Thank you for considering these comments.

Sincerely,



David Schonbrunn,  
President

## **Responses to Comment Set B4**

### **Transportation Solutions Defense and Education Fund (TRANSDEF)**

- B4-1 The SEIR was not intended to be an urban design plan or a Specific Plan. Rather, its purpose is to disclose and analyze the environmental impacts of a rail station in several alternative locations, as identified by SMART staff in consultation with the City of Novato. As noted in the DSEIR, there are advantages and disadvantages to each of the Novato South station site alternatives. SMART concurs with the comment’s sentiment that transit best serves areas of concentrated activity.
- B4-2 The policy analysis required by CEQA is focused on whether the proposed project is in conflict with any adopted land use policies. The SEIR is not a comprehensive land use planning study. The Novato Downtown Plan and General Plan do not appear to specifically use the terms “intensify” or “densification” in relation to goals for Downtown. However, the Downtown Plan does support the use of the NWP right-of-way for transit and for a bicycle path. It also established a policy to “Consider development of a multi-modal transit station at Olive Avenue or the Depot Area.” Therefore, the proposed station site would not conflict with existing policies.
- B4-3 See response B4-2. An evaluation of the potential for further densification of downtown Novato and the hypothetical benefits of such densification is outside the scope of the SEIR.
- B4-4 The purpose of the SEIR document is to evaluate the environmental impacts of alternative Novato South SMART station sites per CEQA, not to evaluate the pros and cons of various station combinations that could be created by adding or subtracting stations along the line. Generally speaking, the presence of only one station in Novato, rather than two, would slightly reduce travel times and marginally improve ridership. On the other hand, the reduced station access would reduce ridership.
- B4-5 Speculation about the message that would be sent by the City of Novato making a formal recommendation for a single station is beyond the scope of the SEIR.
- B4-6 If Downtown Novato and Hamilton were the two Novato SMART stations, a shuttle connection to Fireman’s Fund would likely depart from the Downtown station. Whether this pair of stations is superior “for the future of land use” to other possible pairs is subjective. These two would have the highest projected ridership of any other pair according to the 2006 FEIR and 2008 SEIR estimates, although proposed development at the Fireman’s Fund site could boost Novato North’s ridership. Ultimately, the purpose of the SEIR is not to recommend particular stations in Novato, but to evaluate their impacts per CEQA.
- B4-7 The plans for the Whole Foods project, now under construction, show a landscaped area proposed for a space between the residential development and the NWP right-of-way. This could potentially be the site of a future stairway. If Downtown Novato is selected as a station site, SMART will work with the City of Novato, local property owners, and local transit agencies to finalize station access design.
- B4-8 The proposed bicycle/pedestrian pathway is planned to cross the track at the recently constructed North Hamilton Parkway. As with other similar crossings, the pathway will cross the track as a Class 2 pathway with bike lanes within the street. South of the crossing the pathway is a class-1 pathway on an easement off of and adjacent to the east side of the right-of-way. North of the crossing the pathway is a Class 2 pathway with bike lanes within North

Hamilton Parkway as the roadway leaves the track in a westerly direction. The profile of the grade of the pathway approaching the crossing from the south must conform to the grade of the roadway at the crossing. These details of the pathway transition at the crossing will be developed in the final engineering stage of the project.

- B4-9 SMART is not re-issuing the complete Draft SEIR and the referenced figure is not critical to the analysis. Information about the pedestrian ramp (which would be in compliance with ADA requirements) from Main Gate Road is provided on Draft SEIR page B-19.
- B4-10 The cumulative impact analysis in Draft SEIR Section C.6 makes the distinction between the reasonably foreseeable cumulative freight operations and speculative scenarios. The basis for determining that the speculative scenarios are highly unlikely is provided in Draft SEIR Section B.3 and further explained in Master Response 2.
- B4-11 Shared use of the track and FRA compliance is addressed in Section C.6.
- B4-12 FRA regulations regarding light DMUs are addressed in Section C.6.
- B4-13 The comment references a footnote (DSEIR page B-23) that summarizes information from a NCRA memo. While it is likely that the comment is correct regarding use of the term “maximum capacity” the source of this term is from NCRA, not SMART. Therefore, the SEIR preparers cannot interpret or clarify the intent of the information in the referenced memo. See also B2-18 and Master Response 2.
- B4-14 The FSEIR (Chapter 3) includes a revision to clarify that triennial updates are required for the 2005 Ozone Strategy. The revision to Section C.2.2.1 reflects the status of this air quality management plan. Table C.2-2 is accurate for the purposes of the DSEIR and FSEIR.
- B4-15 In Table C.2-4 of the DSEIR, the monitored PM<sub>2.5</sub> concentrations in 2006 are in bold-face, which indicates that the National Ambient Air Quality Standard (of 35 µg/m<sup>3</sup>) was exceeded. This is a relatively new standard, as explained over pp. C.2-2 to C.2-3, that became effective in late 2006. Therefore, the new standard only applies to a small portion of that year. The California Air Resources Board has not made available a summary of the number of days exceeding the new standard.
- B4-16 Comment noted. Train riders could arrive at the Larkspur rail station by ferry; MTC data indicates that there are approximately 800 daily person trips by those living in San Francisco and working in Sonoma County.
- B4-17 The DSEIR (p. C.6-10) shows that all estimates of excess cancer cases and health risks in the DSEIR are based on continuous exposure over a 70-year lifetime. As stated in the DSEIR (p. C.6-11), localized impacts including health risks due to freight operation would be higher than shown for any location where freight train idling would occur, but the DSEIR also explains that these impacts cannot be reliably quantified because idling locations and durations for the NCRA freight service are not known.
- B4-18 The second paragraph of Section C.3.5, Impact PFS-4 has been modified as suggested to clarify that the total number of accidents, rather than the accident rate, may slightly decrease with the addition of weekend passenger service.
- B4-19 Both time separation and PTC would result in less than significant public safety impacts. The beneficial effect of PTC in reducing collisions is noted in C.6.5.1 on page C.6-18.

- B4-20 The comment is correct in clarifying that the data was extracted using GIS mapping.
- B4-21 The Hamilton Town Center is a concept that originated in the Hamilton Re-Use Plan. It is located about 1/3 mile from the station, bounded by Palm Drive, South Palm Drive and North Hamilton Parkway. At present, there are no pending applications for the area. A station at Hamilton would be compatible with new development at the Hamilton Town Center as the two would be mutually supportive. Furthermore, the site for the Hamilton station is designated for transit facilities.
- B4-22 On a single track rail line, the headways are constrained by the location and frequency of sidings. The SMART operating plan has consistently used an assumption of 30 minute train service during peaks (two trains per hour in each direction). More frequent service is not contemplated. An operational chart of a schedule for 15 minute headways is therefore not necessary.
- B4-23 The clarification is noted; a text change is not necessary.
- B4-24 Regarding potential delays at crossings, the DSEIR correctly notes that the cumulative impact would not be significant for several reasons.
- B4-25 The NCRA proposed freight service would use “off-road” engines that are subject to different regulations than the regulations noted by the comment that affect locomotives. The new Tier 3 standard for newly built locomotives that was established by U.S. EPA on May 6, 2008 (Volume 73 of the Federal Register p. 25101) and would take effect in 2012 would be for 0.10 grams of particulate matter per horsepower-hour. As reported in the DSEIR (p. C.6-9), NCRA’s operator proposes to use locomotives that would emit less than these Tier 3 standards for locomotives.
- B4-26 The sentence on p. C.6-15 is correct as written. The Quiet Zone designations would eliminate SMART’s project-level impact *and* SMART’s contribution to cumulative impacts.
- B4-27 The clarification is noted; a text change is not necessary.

Comment Set B5  
Sierra Club, Sonoma Group



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FOUNDED 1892

Sonoma Group  
Redwood Chapter  
P.O. Box 466, Santa Rosa CA 95402  
(707) 544-7651

April 21, 2008

Lillian Hames  
SMART General Manager  
750 Lindero Street, #200  
San Rafael, CA 94901

Re: Comments on Draft Supplemental Environmental Impact Report

Dear Ms. Hames:

The Sierra Club Sonoma Group welcomes an opportunity to comment on the Draft Supplemental Environmental Impact Report prepared for the Sonoma Marin Area Rail Transit District. The Sonoma Group finds that this report is for the most part comprehensive and complete. Please note however, that even though the Sierra Club generally supports rail service as an environmentally superior alternative to driving, and supported Measure R in 2006, no position has yet been taken regarding the measure being contemplated for the November 2008 ballot. Our comments are made in the interest of better public understanding of the environmental aspects of project.

Executive Summary

1. Page ES-1: It would be helpful to explicitly quote the Marin Countywide Plan and the Draft Sonoma County General Plan elements that call for passenger rail service and bicycle-pedestrian pathways as important transportation modes. Similarly, it would be useful to identify the cities along the railroad right of way that have adopted plans based upon passenger rail and bicycle-pedestrian travel. The report could also point out that parking in Larkspur will become less difficult when the people living along the SMART Corridor have the option of riding the train instead of driving to the ferry terminal.

B5-1

B5-2

Project Description

2. Page B-3. The report might note that self-powered railcars are emblematic of worldwide advances in passenger rail service. Recent developments include tests of hybrid and hydrogen fuel-cell powered equipment, as well as railcars that can draw electric power from third rail or overhead catenaries or operate

B5-3

Comment Set B5, cont.  
Sierra Club, Sonoma Group

as self-powered units. While it is useful to present a detailed discussion of the Siemens “Desiro” light railcar operating in North San Diego County, it would be helpful to advise readers that this is just one of many possible equipment choices. It should also be noted that per-seat weight does not necessarily determine whether it is classified as “light” or “heavy.” It is reasonable to expect that SMART management will consider all available options (i.e., railcars for which operating and maintenance data are available from revenue service experience) as they decide how to meet their service and cost commitments.

B5-3 cont.

3. Page B-4: In describing the characteristics common to light railcars, it would be helpful to clarify some of the factors that will be important in making equipment selections, including relative ability of each railcar to attract ridership. The railcar that competes most strongly with the automobile may well have the largest environmental benefit.

B5-4

4. Pages B-19 to 23: We commend the decision to examine speculative levels of freight service as well as those that are reasonably foreseeable. Although many informed observers conclude that neither a container port in Eureka, nor a quarry at Island Mountain are likely to be established within the next 20 years, the existence of business plans calling for such developments within that time frame insure public interest in the possibilities and consequences.

B5-5

5. Page B -21: It is worth emphasizing that numerous joint commuter and freight dispatching arrangements in California and the United States demonstrate that passenger trains can have high levels of on-time performance, especially when the passenger operation owns the right of way and controls the dispatching, as is the case with SMART. Passing tracks allow for single-track railroads to accommodate as many as 60 trains per day. The study should make it crystal clear that both the law and the 1996 operating agreement governing SMART and NCRA support the compatibility of the two services on the planned track configuration, even at the speculative levels of freight service.

B5-6

6. Pages B-19-23: It may be useful to point out that this study is designed to inform the SMART Board and those interested in its actions, and that even though passenger and freight operations will share the right of way, SMART and the NCRA are independent entities. Because this analysis is based on the plans of the freight operator and the NCRA there is reason to believe that the NCRA environmental study soon to be released will be consistent with it.

B5-7

Regional Setting & Study Methods

7. Page C.2-5: It would be useful for the report to explore the ways that anticipated improvements in automobile efficiency and emissions control may be matched by improvements in the energy efficiency of self-powered railcars. Railcar engines are normally overhauled on a 3-5 year cycle and

B5-8

Comment Set B5, cont.  
Sierra Club, Sonoma Group

replaced on a 10-12 year cycle. Therefore, the railcars can take advantage of improved engine designs during their 30-40 year operating life. Gains in efficiency are likely to occur as diesel engines and emission controls evolve in using Ultra Low Sulfur Fuel. For example, tests of prototype engines show they can act like a vacuum cleaner in removing particulate matter from the atmosphere; the exhaust has fewer particles per cubic foot than the air entering the engine. Similarly, the use of biodiesel produced from algae or waste conversion may be an additional way to reduce greenhouse gas emissions.

B5-8 cont.

8. It would be helpful to caution readers that even though the value of passenger rail service is most evident during rush hours, other benefits related to walkable places near train stations are likely to be more significant over the next 50-100 years. It is also useful to note that the achievement of environmental benefits from transportation advances may justify certain dislocations. The Region can address neither congestion nor energy use, nor greenhouse gas emissions by further expansion of roadways. It is imperative that we have a robust alternative to the highway.

B5-9

Weekend Passenger Rail Service

9. C-3-1: Since 80% of all travel is for non-work purposes, it seems useful for any discussion of weekend service to state the importance of addressing the needs of youth and the elderly. The number of teen non-drivers is growing rapidly, and one quarter of people over 75 do not drive regularly. From our perspective, weekend service is part of a much broader objective; the Region should be planning for eventual seven-day-per-week, round-the-clock passenger rail service.

B5-10

10. C.3-2 and 3-3: Because most weekend traffic congestion is moderate, weekend rail service is expected to serve riders who prefer not to drive, rather than those who want to arrive more quickly or reliably at a destination. Such riders are also likely to be willing to pay more for travel than riders making daily commutes. It will require experimentation to achieve the best weekend schedules. While it is useful to have illustrative data, we would not expend added time or resources to achieve a more rigorous analysis.

B5-11

11. C.3-5: We observe that frequency of service is important for ridership. By operating 15 round-trips on Saturday and Sunday, the Capitol Corridor is able to serve 60% to 75% of its weekday ridership. SMART should consider the broad regional benefits of more than four round-trips on Saturdays and Sundays in the SMART Corridor.

B5-12

12. C.3-6: Rather than attempting to pinpoint congestion relief aspects of Saturday and Sunday rail service, we would evaluate the long range economic and environmental benefits of high quality daily public transit. The benefits of public transportation are not easily segregated by day of operation, however

B5-13

Comment Set B5, cont.  
Sierra Club, Sonoma Group

many studies show that when all costs and externalities are included, automobile dependence is very costly indeed. For example, one could start with the fact that Sonoma and Marin county taxpayers spend more than \$3 billion annually on the existing system of roads and autos. To spend approximately \$30 million per year (1%) on an alternative to Highway 101 seems very cost effective indeed. If required, weekend costs and benefits could be estimated from the annual totals.

B5-13 cont.

13. C.3-9: It would be useful to include information about the ways that train services have stimulated bus services, along with estimates of the resulting community benefits. (See, e.g. the Schumann comparison of rail-bus transit in Sacramento, and bus-only transit in Columbus, OH.)

B5-14

Alternative Train Vehicles—Light DMUs

14. C.4-2 to 4-3: In comparing the energy and emissions characteristics of light railcars with heavy railcars the differences in fuel consumption have a significant range that is not reflected in the differing emissions. Please explain this variance. It should also be noted that per-seat weight does not necessarily determine whether a railcar is labeled “light” or “heavy.” The determining factor is compliance with American crash-survival standards. Also, please quantify the decrease of vibration impacts to residents along the track, as well as noise and vibration effects on riders for the light, as compared with the heavy railcar. Note that one report from experience of both vehicles suggests that the heavy DMU has lower interior noise and vibration, and gives a more comfortable ride. Please suggest the levels at which the attractive capacity of the vehicle would outweigh its energy and emission characteristics.

B5-15

B5-16

B5-17

Revised Cumulative Impacts

15. C.6-2: It would be useful to consider a shortening of the assumed 30-minute minimum headway between trains for purposes of assessing cumulative impacts of passenger and freight traffic. Operation of freight trains at 15 minute or shorter intervals may be one way to avoid unwanted noise from night freight operation. Recent advances in railroad signaling and control systems may make this option affordable.
16. C.6-5: We suggest exploration of the noise reduction benefits from shifting 10% to 14% of heavy truck cargo movement on Highway 101 trains. To what extent do these benefits offset other noise impacts?
17. C.6-17 and 18: It could be helpful to include summary information about the progressive adoption of positive train control systems by other railroads, so that readers can gain a better sense of their possible use in the SMART Corridor. Although there are disadvantages to being a pioneer, there is a real

B5-18

B5-19

B5-20

Comment Set B5, cont.  
Sierra Club, Sonoma Group

possibility that due to its small size and single connection to the national network, SMART would be in a position to play a leading role in the implementation of such systems.	B5-20 cont.
18. FRA Class 4 track is adequate for heavy DMUs operating at speeds up to 80 mph. Pending FRA regulations, the track would also accommodate light DMUs at the same speeds.	B5-21
19. Owing to their greater weight, freight trains do indeed impose greater wear-and-tear on tracks than passenger trains do. However, NCRA trains will operate at lower speed than SMART trains and the shared trackage is relatively free of curves. Therefore the impact will be modest. Nevertheless, SMART will invoice NCRA for damage that is attributable to freight operations. The ability of heavy DMUs to accommodate rough track is moot, inasmuch as the track will be maintained to FRA Class 4.	B5-22
20. C.6-5 & 6-6: State that the effects on roadway traffic that arise from operating passenger as well as freight trains are limited by the temporal separation of SMART and NCRA trains. If the speculative levels of freight service occur, NCRA trains will increase the frequency of vehicular delays, but not their duration. Most freight movements could be accommodated during SMART's daytime off-peak period. However, this level of freight service has not been proposed by NCRA and it is uncertain when or if that many freight trains would ever operate. With two additional trains, there would be a slightly greater frequency of vehicle delays at at-grade crossings than described in the 2005 DEIR. If freight operated nighttime trains, the number of vehicles affected by vehicle delays would be substantially less given lower nighttime traffic volumes.	B5-23
21. C.6-5 & 6-6: Please place the impact of blocked intersections on emergency vehicles in perspective; it is no more or less an issue than the impact of roadway congestion and gridlock without reference to trains. In the pursuit of least impact, NCRA should identify sites where more than one crossing could be blocked simultaneously by a freight train, and emergency service providers should prepare alternate routes - - possibly differing depending upon whether the train is northbound or southbound.	B5-24
22. C.6-13 and 14: Clarify that vibration and noise are not cumulative phenomena, unless one is referring psychological effects. The freight operator has stated that if a trash haul is made from Petaluma, it would be at night, and other freight may be hauled at night to minimize crew costs. The impact on sleeping residents of the estimated 10-20 residences within 50 feet of the tracks could be significant. Noise can be reduced by reducing freight train speeds to 25 mph; and quiet zones could eliminate the use of horns at crossings. Noise can increase blood pressure in sleeping persons; long-term impacts have not been determined.	B5-25

Comment Set B5, cont.  
Sierra Club, Sonoma Group

Project Alternatives

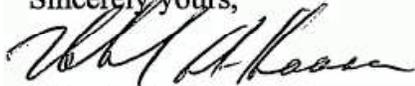
23. D-2: Consider including the attractive power of rail service in reaching the conclusion that rail service is environmentally superior to bus or express bus service over the next 20 years. Riders prefer trains over buses at a rate of approximately 3.5 to 1, and it does not appear that the normal 10% energy economy of hybrid technology would offset the advantages of rail over bus service. Please note that in addition to the energy saving benefits of trains any suggested “low or zero emission vehicles” in fact have measurable environmental costs, especially when life-cycle impacts are considered. Such vehicles pose the question whether pollution is more acceptable at the energy source, or at the point of use, and related questions of economic justice.

B5-26

B5-27

Thank you for inviting the Sierra Club Sonoma Group to share our suggestions and comments regarding the draft report. We look forward to the Final SEIR responses.

Sincerely yours,



Nabeel Al-Shamma  
Chair, Sonoma Group Sierra Club

## Responses to Comment Set B5 Sierra Club, Sonoma Group

- B5-1 The comment is correct that both Marin and Sonoma general plans call for passenger rail service and bicycle/pedestrian pathways. Detailed information on the pertinent policies of local general plans is provided in the 2005 Draft EIR (Section 3.11). The Marin Countywide Plan was recently updated, with adoption by the Marin County Supervisors on November 6, 2007. The Plan calls for the implementation of the SMART project with policy TR-2.f, which is the “development of rail and a trail.” The Plan also references the 2003 vision document “Moving Forward: A 25-Year Vision for Transportation in Marin County,” which calls for “an integrated, multimodal system that relies on travel by bus, *rail*, ferry, bicycle, and foot to supplement and supplant automobile use.”
- There are other policies in the Marin Countywide Plan which are consistent with the proposed SMART project. These include policy TR-2.e which calls specifically for establishment of the North-South bikeway. It also includes policy TR-3.f which calls for the promotion of transit-oriented development, and policy TR-3.i which calls for the provision of shuttle service to transit. Since the SEIR is not revisiting the project as a whole, but only changes in the project and changes in the cumulative scenario, the requested information on general plans is not necessary in the text of the SEIR.
- B5-2 The SEIR preparers agree that SMART service would provide an opportunity for transit users to take the train, rather than drive, to the Larkspur Ferry Terminal.
- B5-3 The clarification provided in the comment is noted.
- B5-4 Comment noted. The DSEIR provides analysis of the environmental impacts of the potential rail vehicles; it is not intended to identify all the policy factors that will inform the Board’s decision regarding vehicle selection.
- B5-5 Comment noted.
- B5-6 Comment noted. Both the original CEQA analysis and SEIR provide documentation that both freight and passenger rail service can be accommodated on the rail corridor.
- B5-7 Information regarding the fact that NCRA and SMART are two separate entities is provided on page B-20; the distinction between the two projects and the scope of the SMART SEIR in relation to NCRA’s operations is further clarified in Master Response 2.
- B5-8 The comment notes that emissions and energy performance of passenger units should be expected to improve in the future as self-powered railcars are equipped with improved engine and transmission technologies. Analyzing emissions of the proposed DMUs depends on equipment that would be selected and placed into service during the early years of SMART operations. Although it would not be appropriate to speculate on when or how the proposed equipment would be replaced with higher-performing railcars, both California and the U.S. EPA have programs for dramatically reducing emissions from locomotives (see DSEIR Section C.6.3.1), and these programs would help to advance the higher-performing technologies described in the comment. The potential use of biodiesel was considered throughout the analyses of the 2005 DEIR, the 2006 FEIR, and the SDEIR.

- B5-9 The direct and indirect benefits of passenger rail are noted. These benefits are identified in the original 2005 DEIR and 2006 FEIR and in the findings for the project.
- B5-10 Comment noted. An aging population means more people who cannot drive, or would like to voluntarily curtail their driving (e.g., for long trips). However, SMART does not contemplate expanding service levels beyond those noted in the SEIR.
- B5-11 Comment noted.
- B5-12 Comment noted. At this time, SMART does not contemplate expanding service levels beyond those noted in the SEIR.
- B5-13 Comment noted. The environmental benefits of the SMART project, as an alternative transportation system, are clearly stated in the original 2006 FEIR. The addition of weekend service would further these benefits at a minimal cost. The comment correctly notes that there are benefits beyond the cost per trip, as avoidance of emissions and energy use are externalities that should be factored into the decision-making.
- B5-14 As noted in the comment, there are indirect benefits associated with the SMART project. By stimulating other transit (network effects), further reductions in overall VMT and associated emissions and energy use could result. See comment and response D26-3.
- B5-15 Emission estimates are based on vendor data where available, and they are subject to limiting regulatory standards. This results in emissions estimates being less variable than fuel efficiency estimates, which are not subject to similar standards.
- B5-16 The comment is correct – per-seat weight does not necessarily determine whether a railcar is identified as light or heavy.
- B5-17 Due to their lighter weight, vibration impacts from light DMUs would be less than described for heavy DMUs in the 2005 DEIR and would therefore also be less than significant; quantification is not necessary. See response B1-19 for information on the relative comfort experienced by passengers in the heavy DMUs versus the light DMUs.
- B5-18 See response B4-22.
- B5-19 Relatively dramatic (at least 50 percent) changes in truck traffic would need to occur before there would be noticeable change in noise levels along Highway 101. The changes in the heavy truck traffic that would be achieved with the freight rail service would be much less than 50 percent.
- B5-20 Comment noted. SMART is monitoring the on-going work on positive train control systems that the Federal Railroad Authority (FRA) and the American Railway Engineers and Maintenance of Way Association (AREMA) are doing. To date it is our understanding that several short test/demonstration track sections are being evaluated. SMART will be moving into the final design phase of the project over the next two years. It is possible that additional decisions or rulings may be forthcoming from the FRA on this topic before final engineering commences on a new signaling system.
- B5-21 Comment noted. The FRA safety standard for Class 4 maximum passenger train speeds is 79 mph. SMART track prepared for trains to go up to 79 mph for heavy DMUs or any other compliant passenger trains would also accommodate light DMU passenger trains for the same speeds.

- B5-22 Comment noted. See also response B1-37.
- B5-23 It is true that roadway traffic effects would be limited by the temporal separation of SMART and NCRA trains. Most, if not all, freight trains would occur outside SMART's operating hours, during daytime non-peak hours, and thus would not affect peak vehicular traffic.
- B5-24 The SEIR preparers concur with the comment. Please see response A1-18.
- B5-25 Noise and vibration are impacts on the environment that can have cumulative effects, as described in the 2005 DEIR and in DSEIR Section C.6.4.
- B5-26 Rail service does have a number of attractive characteristics compared to bus, including more space per passenger (providing for more comfort and wider seats), a better ride quality, greater potential to favorably affect land uses, and more. There is ongoing research about how the provision of "premium" transit services (such as rail) affects ridership; current information can be found at: <http://www.trb.org/TRBNet/ProjectDisplay.asp?ProjectID=1596>. See response B1-44 regarding bus hybrid technology, which has been factored into future bus fleet energy assumptions.
- B5-27 Comment noted. Compared to conventional vehicles, "low or zero emission vehicles" do have different environmental costs due to the different components and systems used in manufacturing and operation of the vehicles. A comparison of life-cycle energy and environmental implications of "low or zero emission vehicles" versus those of conventional motor vehicles would, however, be outside the scope of this analysis.

Comment Set B6  
Marin Audubon Society



Marin Audubon Society

April 22, 2008

P.O. Box 599 | MILL VALLEY, CA 94942-0599 | MARINAUDUBON.ORG

Lillian Hames  
SMART  
750 Lindaro Street, #200  
San Rafael, CA 94901

RE: DSEIR for the Marin Sonoma Area Rail Transportation Project

Dear Ms. Hames:

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report for the Marin Sonoma Area Rail Transportation Project. Our questions and concerns are below.

Discuss the potential for increased wildlife impacts resulting from increased service times due to the addition of week end service. Impacts could result from noise and possible mortality from passing trains.

Compare the fuel consumption and emissions levels of the alternative train DMV's with fuel efficient buses.

**Additional Information/Impacts that Should be Addressed**

1. The condition of the railroad line should be reviewed. Although this may have been addressed in previous EIR, MAS's property has experienced additional damage due to storms this year in the same locations as last year. This embankment that supports the rail tracks blew out again during a January 2008 storm for the second time in two years. Blow outs also occurred in past years. While NCRA has repaired the rail embankment now for the second time in as many years, this situation raises questions about the condition of the line, environmental impacts, adequacy of maintenance/management and costs. Specifically, both the 2007 and 2008 repair replaced the culverts in the embankment in-kind, in spite of the fact that the frequency of their blowing out indicates that flow capacity is clearly inadequate. History indicates that blow outs will continue to occur, depositing ballast on MAS's property where it covers wetlands and destroys habitat. Are there other areas along the rail line where this has occurred? Why is a band-aid approach being taken instead of doing an adequate repair? What are the extra costs resulting from this make-shift management?

2. Potential impacts of the project the Eel River Canyon should be addressed. The freight train service would facilitate the destruction of this rare resource because the train is the only means to serve the area. In addition, the rail line must be considered in its entirety and cannot be

B6-1

B6-2

## Comment Set B6, cont. Marín Audubon Society

segmented (see discussion below under Cumulative Impact Analysis).

B6-2 cont.

### Alternative Station Sites

#### **Hamilton Option**

Describe the condition of this alternative station site. This site is in a low area that could be described as a gully or swale that extends under a bridge over Main Gate Road at the former Air Force base. It could function as a conduit for rainwater and runoff from the adjacent higher areas. Discuss the potential for flooding of the station and parking area. What steps will be taken to prevent flooding. If lands are raised in elevation, what impact would that have on adjacent lands? Would there be an increased risk of flooding for any adjacent areas?

B6-3

Figure C.5-5 shows several areas of wetland vegetation. There is no meaningful discussion of impacts to these wetlands. Avoidance is recommended. What is the potential for actually avoiding these wetland? Do either or both of the proposed designs cover these wetlands? Unless there is a guarantee these wetlands would not be destroyed, the mitigation discussion should address replacing these wetlands in-kind, on or near the project site, at a ratio of at least 2:1 and identify where this mitigation could occur. Putting this issue off for some future time to be addressed by other agencies is not sufficient.

B6-4

This alternative would also destroy .23 acres of oak woodland. Are these native oak trees? What species? Regardless of whether they are identified as heritage trees under the City's ordinance, native oaks should receive maximum protection both because of their ecological importance and current risks of disease. The mitigation should recommend protecting these trees or, if this is impossible, replacement on site or nearby in a ratio of 5:1.

B6-5

#### **Ignacio Y**

Describe the current condition of this site. The area seems to be very degraded as a result of use by kids on motor bikes. There are or were seasonal wetlands in the vicinity. Do any wetlands remain? Would the project impinge on any of these wetlands?

B6-6

### Cumulative Impact Analysis

The DSEIR states that SMART is "not required to...fully analyze all the environmental consequences of NCRA's freight operations" and that "there are both geographic and issue area boundaries to the cumulative analysis." The impacts of the freight project combine with the impacts of commuter rail to cause cumulative significant cumulative impacts.

B6-7

Segments that are not shared would combine to contribute to the cumulative effects. The rail line is planned and would be constructed as a unit, a total project. CEQA does not allow segmenting or separating parts of a project by saying simply that they would not contribute to adverse effects. Therefore, the impacts of the entire rail line, the freight together with the SMART line sections, must be considered. This would include discussion of adverse impacts to the Eel River Canyon as a result of potential mining operations.

**Comment Set B6, cont.  
Marín Audubon Society**

The DSEIS (page C.6-11) claims that freight service would reduce greenhouse gasses. Aren't there trucks that have low emission engines these days? Discuss the potential for using such vehicles as compared to freight trains.

B6-8

Many wildlife species depend on hearing for communicating, pair bonding, locating prey, etc. Discuss the increased noise from freight trains and the cumulative impact of this increased noise on wildlife that are anticipated to be along the track, particular on endangered species, and raptors.

B6-9

Noise and collision impacts on wildlife are dismissed on page C.6-20. Freight trains would operate primarily at night when visibility would be lowest. Wouldn't this increase the chances for collisions and injury/mortality for wildlife that may cross over or land on the tracks?

B6-10

**Growth Inducing**

Discuss the growth inducing impacts on the Eel River Canyon Area that is being considered for mining. One of the clearest effects of the NCRS freight service is allowing and encouraging growth in this area. This is not a development that would or could be served by truck transport because there are no roads.

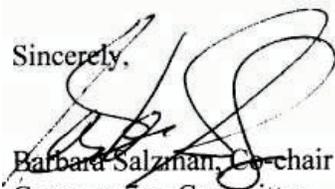
B6-11

**Environmentally Superior Alternative**

The DSEIR Alternatives Analysis continues to diminish and misrepresent the environmental benefits of the express bus alternative which would avoid adverse habitat and wildlife impacts, increased construction, and therefore use of resources, and have emissions and energy savings by using new technology buses.

B6-12

Thank you for considering our concerns.

Sincerely,  
  
Barbara Salzman, Co-chair  
Conservation Committee

## **Responses to Comment Set B6**

### **Marín Audubon Society**

- B6-1 Regarding wildlife impacts from weekend service, the introduction to DSEIR Section C.3 (weekend service analysis) notes that, for issue areas not addressed in the section, impacts would either be negligible or would not change from impacts identified in the 2006 FEIR. Adding four trips per day on Saturday and Sunday would not change the conclusions regarding impacts on wildlife presented in the 2006 FEIR. The 2006 FEIR included full analysis of noise effects and potential mortality from passing trains.
- Fuel consumption and emission issues relative to fuel efficient buses are addressed in response B1-44. The last part of this comment addresses NCRA's repair of recent flooding damage in the San Antonio Creek area, and is not a comment on the adequacy of the supplemental analysis in the DSEIR. The repairs were considered maintenance of the existing line so that the track structure will accommodate the restored operation of NCRA trains. Potential flooding impacts of the SMART proposed project and appropriate mitigation measures were addressed in the 2006 certified FEIR. During the SMART final engineering, a hydrologic study will be performed to determine what specific measures need to be taken to remedy damage from future flooding. (See 2005 DEIR, Mitigation Measure WR-2.)
- B6-2 See Master Response 2.
- B6-3 As noted in Section C.5.3.5, the Hamilton Station site is located outside of the 500-year floodplain, and would not be subject to flooding. No changes to the text of the Draft SEIR are necessary. See also response B6-1.
- B6-4 The potential wetland impact (.11 acre of isolated coastal freshwater seasonal wetland) at the Hamilton alternative station site is fully addressed in Impact BR-5 and adequate mitigation has been identified. A preliminary wetland delineation was performed for the site according to Army Corps of Engineers protocol. The wetland area is not within the main station site, so partial or full avoidance may be possible. If full avoidance is not possible, 2005 FEIR Mitigation Measures BR-5a and 5b would ensure that the impact is reduced to a level that is less than significant. More details about project wetland impacts and mitigation are provided in the 2005 DEIR and 2006 FEIR.
- B6-5 The impact on oak trees is fully disclosed in Impact BR-8, DSEIR pages C.5-38 and C.5-39. The types of oaks are identified in the impact discussion. The Hamilton station site plan was adjusted to preserve and protect numerous larger oak trees (see DSEIR Figure C.5-6 – the trees on the southwest border of the site have been excluded from the development area). See also response B2-35.
- B6-6 The existing conditions at the Ignacio Wye site are described in DSEIR Section C.5.2.3. This section also includes information on potential wetland impacts at the site.
- B6-7 The comment is incorrect that the rail line is planned and would be constructed as a single project. See Master Response 2. Furthermore, potential mining operations are not related to the proposed SMART project and are not required to be analyzed within the scope of SMART's supplemental CEQA analysis.
- B6-8 The comment requests discussion of potential use of low emission diesel trucks in order to haul freight. The DSEIR relies on forecasts of future truck fleet emissions that include vast

improvements in the performance of trucks, when compared to today's fleets. It is because of the improvements expected to occur in the performance of the truck fleet that the freight locomotives must be similarly high performing, meeting the Tier 3 standards for "off-road" engines, as described in DSEIR Section C.6.3.1.

- B6-9 As noted in DSEIR Section C.6.6, noise impacts on wildlife are documented in the 2005 DEIR and 2006 FEIR.
- B6-10 Noise impacts on wildlife are not dismissed; a thorough analysis of noise effects is contained in the previous DEIR and FEIR. Furthermore, there is no documentation to support the comment's assertion that freight trains would operate primarily at night. See also response A1-3.
- B6-11 The potential growth-inducing impacts of freight service north of Cloverdale are not project-level or cumulative impacts of the SMART project. See also Master Response 2 and response B3-31.
- B6-12 The express bus alternative is fully analyzed and compared to SMART's proposed project in the 2006 FEIR. Neither the SMART project nor the Express Bus Alternative would have significant adverse habitat and wildlife impacts. With advances in both rail and bus technology, the proposed rail project would continue to be the environmentally superior alternative, providing net overall environmental benefits in transportation, air quality, energy use, and recreation, as noted in Section D.3 of the DSEIR.

## Comment Set B7 Environmental Protection Information Center

Thursday, April 24, 2008

Lillian Hames  
SMART General Manager  
750 Lindaro Street, #200  
San Rafael, CA 94901



### **Re: Comments on the SMART Draft Supplemental Environmental Impact Report**

To Whom It May Concern:

The Environmental Protection Information Center (EPIC) respectfully submits the following comments on the Sonoma Marin Area Rail Transit Draft Supplemental Environmental Impact Report (DSEIR).

The Environmental Protection Information Center (EPIC) is a community-based non-profit organization that advocates for the the long-term health of the ecosystems of northern California. EPIC is dedicated to preserving, protecting, and restoring biodiversity, native species, watersheds and ecosystems across the North Coast and Klamath-Siskiyou regions. EPIC's members, staff and board regularly use, enjoy, and benefit from the ecosystems which may be affected by proposed rail operations involved in the SMART DSEIR, and are affected by the array of transportation policy choices implicated here.

EPIC hereby incorporates by reference the comments submitted on this document by Californians for Alternatives to Toxics (CATS), Marin Conservation League, Sierra Club Marin Group, Marin Citizens for Effective Transportation, and any other commenters.

### **Freight Rail Impacts are EPIC's Primary Concern**

EPIC has not yet taken a position on the proposed SMART passenger rail proposal. As noted below, EPIC's primary concerns in this matter lie with the proposed freight rail operations associated with the North Coast Rail Authority (NCRA) and Northwestern Pacific Railroad (NWP). However, our review of the SMART DSEIR suggests that in several important respects the DSEIR tends to overstate potential environmental benefits of SMART operation, while inappropriately minimizing potentially significant environmental impacts, particularly those resulting from the joint operation of passenger and freight rail in on the single-track rail line where SMART proposes to operate.

The sum of these glosses appears to paint an unrealistically favorable picture of SMART's net environmental impacts. Such an analysis would not only form a poor basis for well-informed

B7-1

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**Comment Set B7, cont.**  
**Environmental Protection Information Center**

public policy choices, but would fail to meet the requirements of the California Environmental Quality Act (CEQA), which requires objective disclosure and analysis of foreseeable, potentially significant environmental impacts.

B7-1 cont.

In EPIC’s view, the fatal flaw in SMART’s proposal to provide passenger rail service in Sonoma and Marin Counties lies in SMART’s deep connection to the NCRA/ NWP freight rail proposal. This troubling relationship is reflected in the SMART DSEIR’s seriously inadequate CEQA analysis of the potential impacts of NCRA operations. Because of the very extensive overlap of proposed SMART and NCRA operations within the SMART corridor – only the five southernmost SMART stations would not be directly affected by freight rail – the intersection of freight and passenger rail operations is by no means an incidental matter, but poses a series of very difficult problems for SMART proponents. The Final SEIR must address these questions in real depth; the Draft SEIR has clearly failed to do so.

B7-2

One obvious problem for SMART in disclosing and analyzing the NCRA’s plans is that freight proponents have not put forward a clear and reliable statement of their plans, nor complied with CEQA by adequately disclosing and analyzing the potential impacts of those operations along the entirety of their proposed line. Several different sets of projections have been offered by NCRA proponents; they seem to vary by their intended audience as well as over time.

The failure of the NCRA to comply with CEQA by improperly segmenting its analysis of the potential impacts of freight rail is the subject of one legal challenge presently before the Marin County Superior Court (*City of Novato v. NCRA*), in which the court has affirmed NCRA’s duty to perform a comprehensive CEQA analysis for its entire line. Such a full EIR for the NCRA’s whole line should have been completed years ago; the NCRA continues to insist that such a comprehensive analysis is in progress, but meanwhile continues to produce very limited analyses of small sections of its overall project. Will the SMART EIR be supplemented *again* to reflect the assumptions and conclusions in the NCRA’s EIR if and when such a comprehensive document is produced?

B7-3

To avoid having to undertake yet another supplemental EIR, SMART may wish to consider analyzing NCRA’s potential operations in a “worst case” – ie, maximum potential environmental impacts – scenario. What SMART should not do is proceed on the basis of the unrealistic ‘lowball’ assertions that NCRA has offered concerning the quantity, nature, timing, and frequency of potential freight operations on the shared line. This would be true even if the NCRA had proven itself a capable, transparent, and reliable source of information on freight operations. Unfortunately, the history of the NCRA is rife with unrealistic projections, financial and legal irregularities, and a persistent failure to address known hazards, even in the face of binding legal obligations to correct those hazards. The recent efforts by the NCRA staff and board of directors to sideline Marin County’s concerns by excluding its duly appointed representatives from key NCRA decisions underscores the hostility of the NCRA leadership to serious questions about its viability and environmental bona fides.

However, the SMART DSEIR not only accepts the very modest (ie, lowball) projections in the NCRA Initial Study (see B-19) as the basis for the DSEIR analysis of freight impacts – it then describes two sets of projections offered by the NCRA as ‘speculative,’ (see Table B-1) and

## Comment Set B7, cont. Environmental Protection Information Center

claims on that basis that there is no requirement under CEQA to analyze those projections. SMART is on very shaky ground here. Not only is the NCRA actually working to achieve the levels of activity that SMART dismisses as ‘speculative,’ but other documents (see, eg, the Jan 11, 2008 joint proposal by the NCRA and Humboldt Bay Harbor, Recreation and Conservation District to the California Transportation Commission; and the November 2007 Redwood Marine Terminal Feasibility Study prepared for the Humboldt Bay Harbor, Recreation and Conservation District) suggest that the NCRA is actively working toward creation of a containerized shipping port at Humboldt Bay which would likely result in dramatically higher levels of freight shipping than those which SMART has dismissed as ‘speculative.’

B7-3 cont.

For example, the feasibility study noted above included an estimate that each “container ship that discharges and loads all its cargo at Humboldt Bay (3,000 import and 3,000 export containers) would generate 24 unit trains (12 import trains and 12 export trains assuming 250 containers per unit train).” Simply put, that level of freight shipping would dwarf the estimates dismissed as ‘speculative’ by SMART. Certainly they would render untenable some of SMART’s assurances, including those regarding the low probability of freight operations at night, the levels of noise and traffic disruption likely to be occasioned by freight trains, and the lack of potential conflict between freight and passenger rail operations.

To be clear, EPIC views these proposals as undesirable and unrealistic, and would very much like to agree with SMART that they are unlikely ever to actually be implemented. While proponents are continuing to press forward with these proposals, however, it is completely irresponsible, and wholly inadequate as a matter of CEQA compliance, for SMART to ignore their obvious implications for the people, communities, and resources that could be affected by these proposals, including the impacts relevant to SMART’s discussion. EPIC strongly disagrees with SMART’s contention that “these higher levels of freight service are not ‘reasonably foreseeable probable future projects’ for purposes of the cumulative impacts analysis required by CEQA”. (p B-20) If not in this document, where will those potential impacts be considered? If not now, when will they be considered? To avoid the analysis now is only to compound the NCRA’s sins of segmentation, and will vitiate any hope of actually analyzing the potential cumulative impacts of freight and passenger rail, as CEQA requires.

As well, the NCRA has itself seemed at pains not to be limited to the projections of the Initial Study. As NCRA Executive Director Stogner wrote to SMART in late November of 2007 (emphasis added),

*We emphasize, therefore, that any information provided herein is based upon currently available information, **should not be relied upon to foreclose any different nature of rail freight operations.** and should be relied upon by SMART only as the best estimates available to NCRA and NWP Co. as of this time.*

B7-4

Given that the NCRA itself explicitly disavows any limits on its potential operations, SMART cannot lawfully limit its CEQA analysis to the version of NCRA’s plans which SMART would prefer.

Unless SMART is able to secure legally binding commitments from the NCRA regarding the levels of freight operation they will undertake during the life of this project, the Final EIR should

## Comment Set B7, cont. Environmental Protection Information Center

consider and fully analyze a ‘maximum legal freight’ scenario that assumes the NCRA means what it says when it refuses to be limited as to future operations, and projects the maximum number (and size, composition, and payload) of freight trains which could legally be operated on the joint NCRA-SMART rail line.

B7-4 cont.

We would also note that the environmental costs of freight operation are unlikely to be substantially offset by economic benefits to the North Coast public on either end of the rail line. The economic inviability of the NCRA’s rail link through the Eel River canyon – the basic reason the line is not operating today – also means that if the NWP runs at all, it will not likely be at a level consistent with the use of best available technology in locomotives, or with best practices in limiting environmental impacts. The NWP has historically proven to be a uniquely expensive line to operate, due to the unstable geology of the region, particularly in the canyon of the Eel River where the NWP line runs north of Willits.

B7-5

As well, unless a container port were constructed at Humboldt Bay, the potential material that will be hauled by freight is likely to be very low-margin bulk material, including rock, gravel, and garbage, especially in view of the substantial decline in the exports of unfinished lumber products the rail line was originally constructed to move. Thus, the operator will have a substantial incentive to run trains as large as possible, and to run as many trains as possible. This factor reinforces the need for SMART to analyze freight scenarios well beyond the ‘maximum’ assumptions presented in Table B-1.

B7-6

In EPIC’s view, an adequate – which is to say full, objective, and realistic – CEQA assessment of the NCRA component of the overall SMART plan would very likely reveal that the net environmental costs of freight operations would negate any environmental benefits that might be realized from the proposed passenger rail operations. Put another way, by tying the SMART passenger rail proposal to freight rail operations which may conflict directly with the goals of passenger rail service, and which may incur very significant environmental impacts, proponents of the SMART train are placing their proposed passenger rail service at serious, and in EPIC’s view, unnecessary, risk.

B7-7

To assist the public in understanding the real risks and benefits inherent in the proposal to share the single rail line between passenger and freight operations, SMART should analyze a scenario with “No NCRA.” Such an analysis would help to accurately characterize the portion of potential cumulative effects from rail operations that could be ascribed to freight alone. It would also help the public and policy-makers to make informed choices between mutually exclusive alternatives, thus fulfilling one of the key purposes of CEQA’s disclosure and analysis requirements.

B7-8

One of the key benefits of freight transport assumed by the DSEIR has to do with the displacement of truck-based shipping to rail-based freight shipping. Here, we would note that the question is rather more complicated than the cursory discussion provided in the DSEIR would suggest. In particular, the entire length of the rail corridor from Eureka to Marin scarcely approaches the distance where rail begins to compete with truck-based transport on an economic basis; certainly, the displacement of freight shipping originating in the southern portion of the line to trucks would be likely to be even more limited.

B7-9

## Comment Set B7, cont. Environmental Protection Information Center

The point here is that the assumptions reflected in C.6.3.2 on page C.6-12 of the DSEIR may be unfounded, and at least require much more detailed analysis. That is, while it is true that a given unit shipped by rail has lower energy costs and lower air emissions than the same unit shipped by truck, it is not at all clear that the net effect of freight operations would actually be to substantially diminish the shipping-related energy costs and emissions in the area.

B7-9 cont.

An additional issue, also raised by the Marin Conservation League, concerns the loss of wetlands and potential mitigations. It is entirely inappropriate to treat 'replacement' or 'restored' wetlands as the 1:1 equivalent of natural wetlands. In most cases, constructed wetlands do not provide the same quality and level of habitat and ecosystem services that natural wetlands do. In view of the greater than 90% loss of wetlands in California, as well as the consequences for wildlife of fragmentation and degradation of wetlands, the criteria for mitigations where impacts on wetlands cannot otherwise be avoided should be a *net increase in wetland function*, in order to limit the continuing loss of species and processes associated with wetlands. It will usually be necessary to replace wetlands at a ratio significantly greater than 1:1 to achieve a net increase in wetland function.

B7-10

In summary, EPIC is very concerned by the failure of the SMART DSEIR to adequately consider the potentially significant cumulative impacts which may result from the combination of SMART's proposed passenger rail and NCRA's proposed freight rail operations. The implications of levels of freight operation much higher than those SMART wishes to consider run throughout the document, rendering suspect many individual conclusions regarding the putative lack of significant cumulative environmental impacts from the combined operations.

B7-11

These inadequacies are compounded by the suggestion that SMART would like to expand its hours of operation and scheduling following startup. Such hopes can realistically be achieved only if NCRA is given the decent burial it richly deserves. SMART does a disservice to its would-be customers, and to all the citizens of the North Coast, by trying to dance around these issues.

B7-12

Thank you for the opportunity to comment. Please provide responses to these comments, and any additional materials, to EPIC's Program Office at the address below.

Sincerely yours,

/s/

Scott Greacen  
Executive Director  
EPIC  
#122, 600 F St Suite 3  
Arcata CA 95523

**Due to the length of the attachments submitted with this comment, they are not included here, but are available for review at the SMART office.**

attachments:

- a - (3 items) Redwood Marine Terminal Feasibility Study
- b - Joint Application of NCRA & Humboldt Bay Harbor Dist to CTC
- c - NCRA response to SMART Nov 27, 2007

## **Responses to Comment Set B7**

### **Environmental Protection Information Center**

- B7-1 Given the conservative assumptions used in both the original 2006 FEIR and in the Draft SEIR, the environmental benefits of the project are more likely to be understated rather than overstated. The comment does not give specific examples of impact analysis that is either overstated or understated.
- B7-2 The DSEIR provides both a thorough explanation of how the scope of the cumulative analysis was determined and an adequate discussion of likely cumulative impacts of passenger and freight rail operations on the portion of the NWP where both operations will occur. This analysis is appropriately based on the proposed freight operations described in NCRA's NOP for its proposed project. See Master Response 2.
- B7-3 See Master Response 2 regarding "segmentation." The basis for the conclusion that freight operations in the Eel River Canyon are speculative is adequately explained in the DSEIR. The "unrealistic proposals" noted in the comment, including the grant application and feasibility study, are not reasonably foreseeable projects within the meaning of CEQA and therefore need not be analyzed by SMART in the context of cumulative impacts. A "worst case" analysis examines the maximum impacts that are likely to occur and does not require analysis of projections or operations that face numerous environmental, economic, and funding hurdles. Nevertheless, the DSEIR did provide analysis of these speculative scenarios in Section C.6, despite the fact that this level of analysis was not required.
- Contrary to the comment, the Marin County Superior Court did not rule on whether NCRA's environmental analysis must address the entire freight rail corridor north to Eureka. Rather, the court's ruling was limited to finding that the repairs and construction for which NCRA had issued notices of exemption from CEQA were part of the larger project being analyzed in NCRA's EIR for the Russian River Division Freight Rail Project. The SMART DSEIR's cumulative analysis properly considered the entirety of freight operations that are reasonably foreseeable to occur on the portion of the NWP line on which SMART will also operate.
- B7-4 See Master Response 2 and response B7-3. For all the reasons stated in the DSEIR and in these responses to comments, SMART has analyzed the reasonably foreseeable cumulative impacts of freight and passenger rail service. As with any project, the analysis is based on information available at the time the analysis is performed as well as reasonable forecasting of likely occurrences. "Legally binding commitments" are not required for purposes of making an adequate assessment of environmental impacts under CEQA.
- B7-5 Assessing economic benefits of freight operations is not within the scope of the DSEIR. The cumulative impact analysis uses reasonable assumptions regarding freight locomotives and operations.
- B7-6 See Master Response 2.
- B7-7 CEQA does not require a balancing of the environmental benefits of one project over another, independent project. As noted in Master Response 2, SMART's proposed project is not "tied" to NCRA's project but is separate and independent. To the extent these separate projects result in reasonably foreseeable cumulative impacts, the DSEIR provides an adequate analysis of those impacts and SMART's contribution, if any, to them.

- B7-8 The analysis of the SMART project was provided in the 2005 DEIR and 2006 FEIR in the discussion of project-level impacts. As required by CEQA, freight operations were analyzed only in the context of cumulative impacts and only to the extent they could combine with SMART project impacts to produce cumulative effects. Likewise, the DSEIR examines the potential environmental effects of SMART's proposed changes to the project separate and apart from freight rail service, as well as the potential cumulative impacts of both passenger and freight services operating on the same rail line. Therefore, the "No NCRA" scenario is equivalent to the SMART project analyzed in both the previous 2006 FEIR and the DSEIR. See Master Response 2.
- B7-9 The comment speculates that the freight rail corridor may not be of sufficient distance to compete with truck-based transportation and that displacement of trucks by freight rail may be less than shown in the DSEIR. No revisions are needed for the energy or emissions analysis of freight because the DSEIR makes reasonable assumptions that freight rail service would be likely to remove some trucks that would otherwise occur; the comment does not provide any data to the contrary. The DSEIR assumption is reasonable given that the freight service would not create a change in the regional demand for goods-movement services. The level of detail provided in the DSEIR is appropriate for a cumulative analysis; see also Master Response 2.
- B7-10 See response B2-34.
- B7-11 The SMART Draft SEIR goes beyond the requirements of CEQA to analyze potential cumulative impacts. See DSEIR Sections B.3 and C.6. Cumulative impacts of freight service levels that are far beyond what is proposed by NCRA or likely to occur are identified in Section C.6. See Master Response 1 regarding the scope of the DSEIR; see also Master Response 2 regarding the scope of the cumulative analysis.
- B7-12 The 2005 DEIR and 2006 FEIR analyzed SMART's proposed passenger service operations through the year 2025. SMART has proposed no new service increases beyond the 30 minute peak period service included in the DEIR and FEIR other than the four new trains per week-end day analyzed in the DSEIR. SMART's enabling legislation, AB 2224, specifically directs SMART to work cooperatively with NCRA and the Federal Railroad Administration to achieve safe, efficient, and compatible operations of both passenger rail and freight service along the rail line in Sonoma and Marin Counties.

## Comment Set B8 Greenbelt Alliance



Sonoma-Marín Area Rail Transit  
Attention: Lillian Hames  
750 Lindero St. # 200  
San Rafael, CA 94901  
e-mail: [kcochran@sonomamarintrain.org](mailto:kcochran@sonomamarintrain.org)

April 24, 2008

Ms. Hames:

For 50 years, Greenbelt Alliance has protected the region's working farms and natural areas while making the Bay Area's cities better places to live. As an important part of our vision, Greenbelt Alliance promotes policies that will ensure that Bay Area communities include diverse, vibrant neighborhoods served by transit.

We write to respond to the Sonoma Marin Area Rail Transit (SMART) Supplemental Environmental Impact Report (SEIR).

The Supplemental Environmental Impact Report (SEIR) has designated Hamilton as the environmentally superior alternative for the southern Novato station. The Hamilton location would have the highest rail ridership under SEIR analysis. However, it is likely that ridership would be much higher than figures projected in the SEIR, as figures do not include development since 2000, nor development currently in planning stages that will be constructed before 2011 – all in all, several thousand more residences and tens of thousands of square feet of commercial development.

B8-1

The proximity of residences and offices means that a significant number of people will be able to walk or ride a bicycle to the train, which will further reduce Vehicle Miles Traveled (VMT) below any of the other station location alternatives. However, the SEIR does not take into account these increased emissions decreases.

B8-2

SEIR Option B would provide best transit access to the station. By allowing for access to the station from both sides, transit impacts will be reduced for the areas on each side of the station, rather than putting all the access on one side. By increasing access points, the amount of traffic and emissions produced will be reduced in the areas surrounding the station.

B8-3

The Hamilton location is far superior to both of the other potential southern Novato station locations analyzed in the SEIR. The Downtown Novato site is located merely 1

B8-4

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**Comment Set B8, cont.  
Greenbelt Alliance**

mile south of the north Novato station location. This would place two stations within very close proximity, meaning that they would likely draw from each other's catchment areas. This would leave southern Novato residents with limited train access, contributing to lower ridership overall and higher rates of auto travel.

B8-4 cont.

The Ignacio Wye site would be a poor choice for a train station location. Transit access would be difficult; bicycle and pedestrian access from the development on the opposite side of Highway 101 is quite limited. There is little development of any sort near this site, meaning that it would likely be 100% accessed by automobiles, making it a poor choice from the perspective of land use patterns that reduce greenhouse gas emissions. The SEIR analysis did not fully take into account the discrepancy in transit type for access to this site location, and the associated greenhouse gas emissions and water pollution impacts due to this difference. Thus, the SEIR fails to differentiate to the full likely extent this poor location from the others in terms of environmental impacts.

B8-5

Sincerely,

Daisy Pistey-Lyhne  
Sonoma-Marín Field Representative

## **Responses to Comment Set B8**

### **Greenbelt Alliance**

- B8-1      See Master Response 3. The estimate reflects a reasonable portrayal of the station's ridership potential; development since 2000 *is included* in the estimate.
- B8-2      Comment noted. This point is worth noting, but probably the reduction would be relatively small. The SEIR preparers concur that this is an environmental advantage associated with the Hamilton site.
- B8-3      Comment noted. The SEIR preparers agree that Hamilton Station Option B provides the best circulation through the site, especially for through transit vehicles.
- B8-4      This point was noted in the Draft SEIR at the top of the page C.5-5.
- B8-5      The Draft SEIR notes that the Ignacio Wye Station site is not environmentally preferred and points out the environmental disadvantages of this alternative. The additional factors referenced in the comment are noted.

## Comment Set B9 Marin County Bicycle Coalition



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April 23, 2008

Ms. Kathy Cochran  
Sonoma Marin Area Rail Transit  
750 Lindero St. #200  
San Rafael, CA 94901  
Email: [kcochran@sonomamarintrain.org](mailto:kcochran@sonomamarintrain.org)  
Fax: 415-226-0881

Re: **SMART SEIR**

Dear Ms. Cochran:

The Marin County Bicycle Coalition appreciates the opportunity to submit comments on the SMART Supplemental Environmental Impact Report. Below please find comments regarding the Bicycle/Pedestrian Trail, Alternative Rail Car Selection and the Novato South Station Alternatives.

### Bicycle Pedestrian Trail

We appreciate efforts made through this SEIR to look at moving several of the Phase 2 pathway projects to Phase 1 and understand the environmental constraints that prevented these segments from being analyzed in the SEIR.

Because the pathway will help get people to the train stations without a car, and because the EIR shows that trail usage will be about 7,000 on weekdays and 10,000 on the weekends, we urge the SMART staff to recommend and the board to approve 70-75% funding for the bicycle/pedestrian path in the SMART expenditure plan. This funding level is commensurate with the amount of the bicycle/pedestrian pathway that is on the SMART ROW, and this percentage matches what was recommended by the Ad Hoc Committee of the SMART District Board in the spring of 2007. The MCBC continues to work with local municipalities to get the remaining 25%-30% of the bicycle/pedestrian pathway funded and built.

### Alternative Train Vehicles Section

Regarding rail car selection, please ensure that whichever railcar is chosen has the capacity for onboard bicycle storage. Adequate onboard bicycle storage will encourage bicycle ridership thereby reducing the need for automobile parking and automobile traffic (pickups/drop-offs) at the respective stations.

Promoting Safe Bicycling for Everyday  
Transportation and Recreation

B9-1

B9-2

**Comment Set B9, cont.  
Marin County Bicycle Coalition**

**Novato South Station Alternatives**

The most important criteria for choosing station site(s) in South Novato should be proximity to homes and businesses, as well as easy access for walking and bicycling to the station, from both the east and the west side of the tracks. The process for station selection should feature an analysis that will result in a station that serves greatest number of users. The Novato Wye does not have adequate access from the west. "Bicycle and pedestrian accessibility to the site is very poor for the developed residential areas west of the freeway" (SEIR C.5-22), and is therefore not a good alternative."

Any station site chosen should have reasonable access for bicycles to enter and exit train stations and gain access to the pedestrian/bicycle path (or nearby bicycle lanes, etc.). In addition, as we've commented on extensively in previous letters, abundant, safe, covered bicycle parking near the stations is also critical. Studies have shown that the provision of safe bicycle parking is an important determinant of bicycle use.

The Marin County Bicycle Coalition looks forward to the certification of this SEIR, to the development of the SMART expenditure plan, and to SMART being on the ballot in November 2008.

Thank you for your consideration of our comments.

Sincerely,

Andy Peri  
Advocacy Outreach Coordinator



Deb Hubsmith  
Advocacy Director

B9-3

## **Responses to Comment Set B9**

### **Marin County Bicycle Coalition**

- B9-1        Comment noted. SMART has prepared a Funding Plan that will be reviewed by the SMART Board and the public prior to preparation of an Expenditure Plan in the summer of 2008.
- B9-2        Onboard bicycle storage will be provided, regardless of the type of DMU selected for passenger rail service. See also response B1-3.
- B9-3        The SEIR preparers concur with the comment regarding access to the Ignacio Wye site. All stations would have bicycle parking, and will have provision for expanding bicycle parking in the future if the need arises. Bicycles can play an important role not only for access, but also egress from stations.

## Comment Set B10 Californians for Alternatives to Toxics

Californians for Alternatives to Toxics  
315 P Street, Eureka, CA 95501  
707.445.5100 [www.alternatives2toxics.org](http://www.alternatives2toxics.org)

Thursday, April 24, 2008

Lillian Hames  
SMART General Manager  
750 Lindaro Street, #200  
San Rafael, CA 94901

By email

Regarding: Comments to Sonoma-Marín Area Rail Transit (SMART) Draft  
Supplemental Environmental Impact Report

Dear Ms. Hames,

Californians for Alternatives to Toxics (CATs) submits the following comments on the Sonoma Marin Area Rail Transit Draft Supplemental Environmental Impact Report (DSEIR).

CATs is a public interest, membership non-profit organization whose mission is to give the general public, particularly residents of northern California, control over toxic chemicals in their environment. This mission arises from a broader underlying concern for our membership in relation to their dependence on the environment for their sustained health, education, cultural activities and livelihood. These comments are submitted on behalf of the CATs membership, particularly those who reside, recreate and/or work in Sonoma and Marin counties who stand to be the most impacted by the current proposals analyzed in the SEIR.

CATs is joined in these comments by Friends of the Eel River and Humboldt Baykeeper (hereafter "CATs"). We hereby incorporate by reference the comments submitted on this document by Environmental Protection Information Center (EPIC), Marin Conservation League, Sierra Club Marin Group, Marin Citizens for Effective Transportation, and any other individuals and organizations who have submitted their comments regarding the SEIR.

CEQA, Segmenting of Projects and Failure to Analyze

CATs neither supports nor denies the need for freight or passenger transport by rail within the railroad corridor. CATs does support the development of a clear vision of the railroad corridor's future use. The CATs position is that the current SEIR encourages piecemeal planning, piecemeal processing, and invites inconsistent treatment of projects across the railroad corridor landscape. CATs therefore encourages the SMART decision makers to reject the current proposal and to instead conform to the California Environmental Quality Act (CEQA) by preparing an Environmental Impact Report for all aspects of the entire railroad corridor.

CATs' main concern regarding the present SEIR is that it is another attempt to segment projects within a continuous, one-piece railroad corridor that stretches from Arcata to Larkspur and to Lombard. Let's be completely clear about it: The SEIR is the LATEST

B10-1

## Comment Set B10, cont. Californians for Alternatives to Toxics

in a SERIES of ILLEGALLY SEGMENTED PROJECTS that have been put forth by the entities involved in efforts to restart rail use-- the North Coast Railroad Authority (NCRA) and SMART -- within this single, of-a-piece, unsegmentable railroad corridor. It is self-evident that no action within the corridor can stand alone. Virtually every action undertaken within the railroad corridor affects all other parts of the corridor. Freight development in the southern end of the railroad corridor will affect attempts to open the Eel River canyon to hauling freight or extracting gravel and development of Humboldt Bay as a deep water port. Passenger rail must be built on the back of freight rail. CATs asserts that within the railroad corridor all parts are interconnected, thus a joint NCRA/SMART Environmental Impact Report for the entire railroad corridor must be prepared. Because federal money from the Federal Emergency Management Agency may also be involved in projects within the railroad corridor, the Administrative Final Programmatic Environmental Assessment of March, 2004 may need to be rewritten to support a full railroad corridor EIR.

B10-1 cont.

The owners and users of the railroad corridor are not stand-alone individual entities. They more resemble "Siamese twins," linked together in such a way that neither can move in any direction without the other. The reasons driving the present SEIR, specifically the increased freight usage described by NCRA, underscore the need to study the entire picture when considering part of its development.

B10-2

As the NCRA described in a letter to SMART that underlies the current need for analysis, "We emphasize, therefore, that any information provided herein is based upon currently available information, should not be relied upon to foreclose any different nature of rail freight operations, and should be relied upon by SMART only as the best estimates available to NCRA and NWP Co. as of this time." [Attachment 1]

B10-3

NCRA then provides the "currently available" information that "should not be relied upon to foreclose any different nature of rail operations" that SMART, in the SEIR, then relies upon for its analysis of impacts of the project. Thus, the range of potential impacts for freight movement described in the SEIR cannot be complete and is not adequate, thereby failing to provide the full environmental review required under CEQA. SMART needs to get more information about the freight that NCRA COULD carry, how many trains COULD conceivably be running on the SMART portion of the railroad corridor before it can conduct an SEIR.

The impacts of the SMART passenger train project can only be evaluated when the analyzers and ultimately the decision makers have a grasp of the totality of the impacts of "re-starting rail operations," as NCRA states in the above referenced letter, within the railroad corridor. This current SEIR, however, conceals the total impacts of re-starting rail operations with further confusion and division. Re-starting the railroad is necessary because it was shut down by Order 21 of the Federal Railroad Administration, December 9, 1998. [Attachment 8]

Neither the Public, nor SMART, nor the NCRA can say what the full extent of future rail freight operations will be. This is unfair to all parties and a recipe for conflict. This confusion also makes it virtually impossible to accurately perform environmental review under CEQA and knowledgeably compare different alternatives.

"Big picture" projects – transportation corridors, general plan updates, large specific plans for urbanized areas – are well suited for the fundamentals of CEQA – impact disclosure and mitigation, and analysis of a range of alternatives. In these settings, public

B10-4

## Comment Set B10, cont. Californians for Alternatives to Toxics

participation makes the CEQA process a forum for stakeholder input, and community visioning. High visibility assures accountability. Unfortunately, this has not been provided at any point in the many years of attempts to develop environmental reviews of projects within the railroad corridor.

The closest any of the related agencies have come to providing an adequate environmental review was in the above referenced March, 2004 FEMA “Administrative Final Programmatic Environmental Assessment” (South End Railroad PEA). [Attachment 2] This document was created in response to a request for federal funding by the North Coast Railroad Authority (NCRA) to perform repairs to the Russian River Division of the NCRA.

The introduction to the South End Railroad PEA states in part:

“Since the exact scope, location, and time frame for individual actions to be undertaken for the Proposed Action Alternative are currently undefined, FEMA has prepared this Programmatic Environmental Assessment. ...As and when NCRA develops plans for a specific action, FEMA would have an opportunity to review that action within the context of the South End Railroad PEA to determine if more site-specific analysis and documentation would be required to comply with NEPA and its implementing regulations. If the level of analysis provided by the South End Railroad PEA is insufficient for the specific action, then additional analysis would be tiered from this PEA, in accordance with 40 CFR Part 1508.28.”

(South End Railroad PEA, March 2004, Introduction, page 1-1)

Similarly, the scope, location and time frame of the SMART proposal to establish a passenger rail line is currently undefined, or is subject to alteration or to the addition of other projects that should properly be considered as part of the current review. The NCRA has revealed plans, in various stages of completion, to add freight lines to the NCRA from Lombard and reaching as far North as Samoa. An Environmental Impact Report (EIR) should be prepared for proposed activities covering this entire geographic area. Just as FEMA prepared a programmatic document to which future analyses could be “tiered,” here SMART must, in conjunction with the NCRA, at a minimum, prepare a programmatic EIR which, among other things, takes into account and describes all foreseeable related projects by the NCRA, the NWP, or SMART that could affect the environment, particularly identifying any cumulative impacts from foreseeable future projects.

EIRs that take into consideration an entire transportation corridor, here the railroad corridor, are advantageous because they facilitate an earlier and more comprehensive analysis of potential effects, alternatives and cumulative effects than is possible on a piecemeal, project-by-project basis. At a minimum, additional analysis can occur prior to the approval of individual projects not analyzed at a project-specific level in an EIR to determine if the proposed activity is within the scope of the analysis conducted in a programmatic EIR, in the case to identify potential impacts of the proposed project that were not identified earlier, and whether approval of the project may lead to cumulative effects.

B10-4 cont.

B10-5

B10-6

## Comment Set B10, cont. Californians for Alternatives to Toxics

On the other hand, piecemeal project-by-project analysis – here the SMART SEIR is the example– is doomed to failure. The reasons are legion:

- Biological impacts, and their significance to the ecosystem, are not effectively analyzed or mitigated on a piecemeal, project-by-project basis;
- Cumulative impacts are not addressed through such EIRs;
- Alternatives analysis becomes an artifice;
- “Gaming” of project objectives to produce a predetermined, pro forma outcome is common;
- Overriding considerations are used routinely and cynically; and
- The multitude of projects precludes effective monitoring by the public.

B10-7

That analysis of impacts to the rail corridor is piecemealed in the SEIR is supported by NCRA’s point in the above-referenced letter that NCRA is preparing an EIR for operations in the SMART portion of the corridor. [Attachment 3]

That the analysis of impacts to the railroad corridor is piecemealed is supported by the Minute Order, Marin Superior Court, 01/08/08, Case No.: CV024506 [Attachment 4] and Order Re Preliminary Injunction, City of Novato v. North Coast Railroad Auth., Marin Superior Court (Case No. CV074645, Order Re Preliminary Injunction, Jan. 22, 2008). [Attachment 3]

B10-8

The analysis of impacts to the railroad corridor has also been piecemealed in Agreement For the Resurrection of Operations Upon the Northwestern Pacific Railroad Line and Lease Between North Coast Railroad Authority and Northwestern Pacific Railroad Company (“NWP Co.”), September 2006 [Attachment 5] which provides “after obtaining the necessary authority or exemption from the STB, NWP shall be the sole and exclusive provider of rail freight service to, from and across the premises.” This language effectively gives NWP a freight monopoly over what is referred to as “the premises,” which covers the rail from Lombard to Willits at least, and if NWP exercises an option, then through the Eel River Canyon. To summarize: 1. Approval of this project would enable the abuse of market power by NWP and 2. Piecemealing the project has the effect of obscuring this potential abuse of market power. [see also Attachment 6, Bridge Financing and Security Agreement Between NCRA and NWP Co. dated September 12, 2007 and Business plan for the NWP Co., October 25, 2006 (Attachment 7) See also Surface Transportation Board, Docket #FD\_35073\_0, DECISION DENIED FRIENDS OF EEL RIVER’S PETITION TO REVOKE THE NOTICE OF EXEMPTION FILED BY NORTHWESTERN PACIFIC RAILROAD COMPANY, WHICH AUTHORIZED A CHANGE OF OPERATORS OVER AN APPROXIMATELY 142.2-MILE RAIL LINE IN CALIFORNIA. [Attachment 10]

That SMART is joined at the hip and can’t disassociate from the NCRA ties it to the various financial problems of NCRA, regardless of liability. If NCRA can’t hold up its end of maintaining the corridor, if it incurs debt that prevents it from paying for repairs, SMART may not be able to use its corridor. [Attachment 9]

B10-9

We see no evidence that NCRA and SMART are communicating effectively or that the boards of the two authorities ever meet. It appears that the SEIR is the result of conflict between NCRA and SMART. As a result of not conducting a full railroad corridor EIR which would take into consideration all the significant impacts of re-starting the railroad

B10-10

**Comment Set B10, cont.  
Californians for Alternatives to Toxics**

and other potential activities, SMART may spend millions of dollars on the current project and may still not have an operational passenger line because EIRs that are still undone, including those noted earlier, could result in mitigations that could cause changes that would devour the money, leaving nothing completed before funds are dissipated. This very real possibility is never analyzed in the SEIR.

B10-10 cont.

In conclusion, the SEIR is in violation of CEQA because it does not have enough information to conduct a full environmental review of the project, and it does not have enough information because it analyzes only a segment of the project in isolation in time an sprace from the entire project – restarting the railroad – and a segment of the geography involved – the entire, connected railroad corridor – in violation of CEQA.

B10-11

Again, we urge SMART to properly conduct a full Environmental Impact Report with NCRA of actions that may be undertaken within the entire railroad corridor.

Sincerely,

Patty Clary  
Programs and Policy Director  
Californians for Alternatives to Toxics

Joined by  
Nadananda  
Friends of the Eel River  
And  
Pete Nichols  
Humboldt Baykeeper

## **Responses to Comment Set B10**

### **Californians for Alternatives to Toxics**

- B10-1 See Master Response 2.
- B10-2 See Master Response 2 regarding SMART and NCRA’s status as separate public agencies. The DSEIR was prepared to address potential SMART project changes (e.g., the addition of weekend service), as well as changed circumstances regarding potential freight operations.
- B10-3 An EIR analysis necessarily relies on “currently available” information; information that is not available cannot be analyzed. The DSEIR analysis is both independent and comprehensive, evaluating the reasonably foreseeable cumulative impacts of passenger and freight rail service.
- B10-4 See Master Response 2. The rail corridor is an existing corridor. The SMART project has been and continues to be planned with high public visibility, with many years of studies, visioning and community participation. See 2005 Draft EIR Section 2.4.
- B10-5 Comment noted.
- B10-6 See Master Response 2. The scope of the SMART project is defined in the 2005 DEIR and 2006 FEIR. Proposed changes to the project are analyzed in the DSEIR. Whatever advantages might be realized with a programmatic EIR that analyzed the full range of train operations on the entire NWP corridor, such an analysis is not required by CEQA for purposes of SMART’s specific project proposal for passenger rail service from Cloverdale to Larkspur, particularly in the context of supplemental environmental analysis. See also Master Response 1.
- B10-7 See Master Responses 1 and 2. The comment references plans and comprehensive programs that are subject to programmatic EIRs. The SMART environmental analysis is project-specific.
- B10-8 See Master Response 2. The attachments noted in the comment do not support an argument that the separate analysis of two separate projects proposed by different public agencies is “piecemealing.”
- B10-9 SMART and NCRA are separate and independent public agencies. See Master Response 2.
- B10-10 See Master Response 2. Efforts to achieve greater coordination between the two agencies are on-going. The SEIR is not a result of conflict between NCRA and SMART. The SEIR is required because SMART proposes changes to its project and because the cumulative scenario has changed. See DSEIR Chapter 1 for a discussion of SEIR purpose and need.
- B10-11 See Master Responses 1 and 2.

Comment Set B11  
Friends of SMART

FRIENDS OF SMART

April 24, 2008

Lillian Hames  
SMART General Manager  
750 Lindaro Street, #200  
San Rafael, CA 94901

Re: Draft Supplemental Environmental Impact Report -- Comments

Dear Ms. Hames:

Friends of SMART is pleased to comment on the Draft Supplemental Environmental Impact Report prepared for the Sonoma Marin Area Rail Transit District. We consider the Draft SEIR to be adequate, and our comments are primarily for purposes of clarifying the document for better public understanding.

Executive Summary

Most readers have not seen many of the planning documents that supported creation of the SMART District and the current rail service plan. A selection of quotations (with citations) would make these facts clear for policy makers and the public in evaluating impacts. Many readers are also unaware of the documents recommending locations for passing tracks and the bicycle-pedestrian pathway; a short description of these items would be helpful.

B11-1

It is important for readers to understand that the value of passenger rail service is not limited to instances of congestion. The effects of more walkable places near train stations are likely to become an even more significant factor. Rail service as an alternative to driving is essential to addressing energy use, and global warming in this region.

B11-2

Project Description

Achieving the benefits of weekend service will require considerable marketing skill, experimentation, and collaboration with destination venues. While a planned level of service is necessary for purposes of analysis the SEIR should make clear that additional weekend service could be provided if justified.

B11-3

Railcar selection involves trade-offs between factors such as size, comfort, speed, and efficiency. It would be helpful to note that per-seat weight does not necessarily determine whether a railcar is classified as "light" or "heavy." Further, it would be helpful to mention some of the factors likely to influence equipment selection, and the effect of the style or comfort level of a railcar in competing successfully with the automobile.

B11-4

555 Fifth Street, 3d floor, Santa Rosa, CA, 95401 707/578-9133

Comment Set B11, cont.  
Friends of SMART

Novato South Station descriptions should make clear that the suggested concepts respond to observed constraints that affect station plans, and that a great deal of local participation will be invited in the actual design of a station at whatever site is ultimately selected.

B11-5

In the Cumulative Impacts section, please clarify the reasons for the distinctions between freight trains that would be needed to serve known customers in the Petaluma-Windsor Corridor, those that depend upon the development of future markets, and those that depend upon very large future infusions of capital. While the existence of business plans for service to speculative ventures such as a container port in Eureka or a quarry at Island Mountain necessitate some attention, the facts that make them unlikely to materialize within the next two decades should be foreshadowed in this section.

B11-6

Regional Setting & Study Methods

Air quality and energy efficiency improvements in automobiles may be matched by gains in self-powered railcars, particularly if transmission and hybrid technologies advance. Please note that engine overhauls and replacements permit railcars to benefit from improved engine designs. Also, in the future biodiesel fuel may be produced from algae or waste conversion making it a factor as well.

B11-7

Weekend Passenger Rail Service

Please consider the advantages from 7-day-per-week rail transportation as an influence on community development and ridership. Also consider the positive impact of rail service on bus utilization.

B11-8

Alternative Train Vehicles—Light DMUs

Please clarify the variances between energy and emissions characteristics for light and heavy railcars. Also, consider the limitations of light railcars in the event of substantial ridership growth.

B11-9

Novato South Station Alternatives

Novato South Station alternatives discussion should make clear that the suggested concepts respond to the observed constraints affecting station plans, and that a great deal of local participation would be invited in the actual design of a station at whatever site is ultimately chosen.

B11-10

555 Fifth Street, 3d floor, Santa Rosa, CA, 95401 707/578-9133

Comment Set B11, cont.  
Friends of SMART

Revised Cumulative Impacts

Please emphasize that there is sufficient track capacity, and adequate passing tracks to assure on-time passenger trains, even at most of the speculative levels of freight service. SMART's ownership of the right of way and control of dispatching is an important factor.

B11-11

If the speculative levels of freight service ever come to pass, dispatching trains at 15 minute or shorter intervals may be one way to avoid unwanted noise from night freight operation. Please indicate what signaling and control systems would be required to make this option affordable.

B11-12

Please provide a perspective concerning the possibility that a train might block some emergency vehicle; normal traffic congestion is a greater impediment to an emergency vehicle than any train.

B11-13

Project Alternatives

Many studies have shown that rail service attracts far more riders than an equivalent bus service. While this is an important reason why SMART is environmentally superior to bus or express bus service, trains not only get more drivers out of their cars, they encourage the creation of walkable places that lessen the overall demand for autos, buses and trains. Although this factor can be difficult to measure, its impact over the next 50-100 years is likely to be larger than any other step that could be taken in the Region. The SEIR should at least mention this factor.

B11-14

Thank you for conducting this analysis in a clear and expeditious way. We look forward to the Final SEIR responses.

Yours truly,

Tanya Narath  
Friends of SMART

555 Fifth Street, 3d floor, Santa Rosa, CA, 95401 707/578-9133

## **Responses to Comment Set B11**

### **Friends of SMART**

- B11-1 Comment noted. Documents that include the location of the passing tracks and the bicycle and pedestrian path are available at SMART's offices for public review.
- B11-2 Comment noted. There are a variety of benefits produced by the proposed project beyond congestion relief. These include air quality benefits, greenhouse gas reductions and furtherance of land use and transportation objectives of most local General Plans.
- B11-3 Comment noted.
- B11-4 See responses to comments B5-16 and B5-17. The details of railcar selection, while important, do not affect the overall conclusions of the impact analysis. The combined impact analyses in the 2006 FEIR and in the SEIR fully disclose impacts of both light and heavy DMUs. The SMART Board will ultimately decide which DMU to use. Either type of DMU would compete successfully with both automobiles and buses, due to trip time, comfort, and ability to move about the train and to work or read.
- B11-5 Comment noted. It is true that there are constraints at each alternative station site. The designs shown in both the 2006 FEIR and the SEIR are conceptual. SMART has committed to working with local jurisdictions on station designs (see 2006 FEIR environmental compliance measures, page 4-11).
- B11-6 The requested information is in DSEIR Section B.3, which makes the distinction between levels of freight service that are reasonably foreseeable and levels that are highly speculative.
- B11-7 See response B5-8.
- B11-8 Existing transit services were discussed on DSEIR pages C.3-3 and C.3-4. See also response B5-14.
- B11-9 DSEIR Section C.4 provides details on the energy and emissions savings generally provided by light DMUs compared to heavy DMUs. See also response B5-15. If substantial ridership growth occurs, additional passenger units could be added to either the light or heavy DMUs, as needed. However, it should be noted that the DSEIR, like the 2005 DEIR, analyzes the environmental impacts associated with ridership projected through the year 2025.
- B11-10 See response to comment B11-5.
- B11-11 SMART concurs with the comment regarding sufficient track capacity and passing infrastructure to accommodate both freight and passenger rail service.
- B11-12 SMART is not proposing headways more frequent than 30 minutes, and freight service beyond the levels identified in NCRA's Initial Study is highly speculative (see Master Response 2). Accordingly, an analysis of the costs of more frequent signaling and control systems is beyond the scope of the SEIR.
- B11-13 See response A1-18.
- B11-14 See response B5-26.

## Comment Set C1 Eric McCaughrin

Eric McCaughrin

SMART District Office  
750 Lindero Street, Suite 200  
San Rafael, CA 94901

Sir/Madam,

Thank you for the opportunity to submit comments on the Draft Supplemental Environmental Impact Report (DSEIR) on the "SMART" rail corridor. This rail line is a vital resource in the North Bay. For the sake of future quality of life, it is important this infrastructure be developed in the best possible way. In particular, the rail vehicle selection and issues of freight handling will have enormous impact on performance of the rail line. Most of the following comments concern Chapter C.4 ("Alternative Train Vehicles").

### Vehicle Data

The comparative analysis in Chapter C.4 appears to use the San Diego *Sprinter* "light" DMU as a reference against the Colorado Railcar "heavy" DMU. The San Diego *Sprinter* uses modified Siemens *Desiro* model DMU. Even though this DMU model is widely used, its performance figures may not be applicable here, nor considered "typical" of a light DMU operating a rural, commuter service.

C1-1

Page C.4-1 states that light DMU have lower top speed (75 mph). While this is true of the San Diego *Sprinter*, it is not the case for light DMU's in general. There are a large number of commercially available light DMU's with top speed greater than 75mph.

The *Sprinter* also has very close station spacing (with station stops every 2-3 minutes), whereas SMART stations will have farther spacing, as typically found in a commuter system. Because the *Sprinter* spends most of its time accelerating and stopping at stations, its fuel consumption may be higher than what can be expected in a commuter operation. Page C.4-3 states that a light DMU vehicle would get 1.9 miles per gallon. That figure is considerably lower than what has been reported from actual DMU systems operating in rural Germany. For example, the Prignitzer Eisenbahn commuter lines get 5.9 mpg using *Regioshuttle* DMUs (70 seats).

C1-2

Some data for Colorado Railcar heavy DMU equipment is missing or incomplete. Since fuel consumption is affected by station spacing and gradients, what assumptions went into the 1.5-1.8mpg figure (p. C.4-3)? The DSEIR (and the 2001 Vehicle Alternatives Report) suggest 2-car configurations may be used, giving actual fuel economy of only 0.75-0.9mpg. To simplify comparisons, the DSEIR should report fuel economy measures on a *per seat* basis.

C1-3

### Operating Efficiencies

The DEIR does not go into the substantial cost overhead of operating heavy DMU on a freight network, vs. light DMU transit service. The heavy DMU would most likely require 2-man operation (driver and conductor), whereas the light transit DMU is a 1-man operation (driver only).

C1-4

When light DMU service has been implemented in the US, level platform boarding is provided, greatly reducing dwell time (10-20 seconds) and improving mobility for seniors, wheelchair users, and bicyclists. It is unlikely the heavy DMU alternative permits level platform boarding. Dwell time for the single-door, heavy DMU would be measured in minutes, not seconds. A five minute delay might be expected when the wheelchair lift is deployed. (It should also be noted that it is unprecedented to build a 21<sup>st</sup> century passenger system in the Bay Area without maximum feasible accommodation for persons with mobility issues.)

C1-5

This data suggest SMART might reduce operating expenses by at least a factor of two through the use of light DMU trainsets (due to lower fuel and crew costs). In other words, SMART could double the

C1-6

**Comment Set C1, cont.  
Eric McCaughrin**

frequency of service without impact to operating budget. This greater frequency of service, combined with speed improvements (i.e. shorter station dwell time) indicate the DSEIR understated the environmental benefits of light DMU technology. A higher quality service will attract more ridership from automobiles, and consequently provide greater reductions in GHG and other emissions. The DSEIR does not analyze this approach; rather, it merely substitutes light DMU for heavy DMU without changing the operating parameters, or taking into account the operating efficiencies gained through a light-DMU transit operation.

C1-6 cont.

This supplemental environmental review began with citizen concerns over freight rail impacts of the SMART project. Rather than address these concerns, the DSEIR raised more questions than it answers. Since the DSEIR is pessimistic on NCRA ever resuming freight service, there does not appear to be cost-benefit from retaining freight capability. At the very least, the DSEIR should quantify and document the additional costs of the freight-rail alternative, if not propose changes in the state legislation which created the SMART-NCRA partnership so as to require NCRA to mitigate additional costs.

C1-7

Sincerely,



Eric McCaughrin

## Responses to Comment Set C1 Eric McCaughrin

- C1-1        The comment is noted. It is true that 75mph, while indicative of the top speed of the current Siemens Desiro light DMU vehicles, is not indicative of the top speed for all light DMUs. However, this does not affect the overall analysis in the SEIR.
- C1-2        The DSEIR must assume a certain fuel efficiency for the light DMU. Because there is a range of light DMU equipment that is eligible for selection, the DSEIR relies on a fuel efficiency that reflects a reasonable worst-case (1.93 miles per gallon). The actual fuel efficiency is expected to be higher than that assumed in the DSEIR. Therefore, the analysis in the DSEIR is conservative and may overstate adverse impacts and understate beneficial effects in terms of air quality and energy use impacts.
- C1-3        As noted by the comment, fuel efficiency data depends on a variety of factors. The fuel consumption figures for the heavy DMUs were set forth in the 2006 FEIR and June 2005 Air Quality Technical Study, which were based on factors from Colorado Railcar on a per-train basis. Energy and emission calculations for the heavy DMU and light DMU are based on fuel consumption over train-miles traveled rather than on a ‘per seat’ basis because the number of seats per train is fixed and cannot be varied. Energy consumption and emissions depend on the number of train-miles traveled, not the number of seats per train.
- C1-4        SMART is planning to have two-person crews for each train regardless of vehicle type.
- C1-5        See response B1-20.
- C1-6        The comment claims that selecting the light DMUs would enable a higher quality of service than what is proposed by SMART, attracting more riders, which would result in greater environmental benefits. SMART is not proposing more frequent service than that defined in the project description of the DSEIR; the DSEIR adequately analyses the environmental impacts and benefits of using light DMUs for passenger rail service as proposed.
- The purpose of the SEIR is to determine whether the light DMU introduces new environmental impacts that were not considered in the FEIR, which assumed use of heavy DMUs. The essential conclusion of the document is that the light DMU has both environmental advantages and tradeoffs. The SEIR is not intended to make recommendations on which vehicle to select.
- C1-7        The SMART proposed project is for passenger rail service; the project does not have freight rail impacts. A cost-benefit analysis of NCRA’s freight operations is outside the scope of an environmental document for the proposed passenger rail service. These comments should be directed to NCRA, the public agency responsible for freight operations on the NWP. See Master Response 2.

**Comment Set C2**  
**Ann Hayward**

**From:** ANN HAYWARD [mailto:annhay06@sbcglobal.net]  
**Sent:** Wednesday, April 02, 2008 3:36 PM  
**To:** Kathy Cochran  
**Subject:** SMART Station at Hamilton

Please take this as another voice of NO for a station at Hamilton. It is a lovely community that does not need a polluting train coming through or near any housing or projects.

Please get it right this time the TRAIN is not it for taking cars off the road - plan one that goes at least to Sausalito and see what a different reaction you might get!!!!

NO - NO - NO - NO

Ann Hayward

C2-1

## **Responses to Comment Set C2**

### **Ann Hayward**

- C2-1      The comment opposing the project is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site. The analysis in the 2006 FEIR demonstrated that the proposed rail service would indeed remove cars from the highway.

## Comment Set C3 Paul Morris

**From:** Paul Morris [mailto:pwmorris90@hotmail.com]  
**Sent:** Wednesday, April 02, 2008 5:50 PM  
**To:** Kathy Cochran; novatocouncil@ci.novato.ca.us  
**Subject:** Smart Rail Station

Dear Council Members:

I am a Hamilton resident that is a proponent of the proposed SMART rail system, but opposed to the southern Novato station location in Hamilton Field. As a member of this community, I have heard much concern about the location between Main Gate Road & North Hamilton Parkway. This location is amongst 3 schools, NBCC, Novato Charter & Hamilton Elementary School. Also, close by is the New Beginnings homeless shelter which is in process of expansion. This will draw members of the shelter to public transportation, as it should. However, mixing children with the homeless is a potential recipe for disaster. By locating the station to the North of the new Hamilton Safeway complex, you will cater to the elderly who will surely use the system more than most, and draw the members of new beginnings away from the residential areas of Hamilton, and towards existing public transportation. Please consider these points when making what will surely be a critical decision for this community.

Sincerely,

Paul W. Morris

C3-1

**Responses to Comment Set C3**  
**Paul Morris**

- C3-1        The comment makes reference to the proposed rail project mixing homeless people with school children. The homeless facility is already in place in proximity to schools, so the rail project would not be responsible for mixing these two population types. School and child safety in relation to the proposed rail project is addressed in the 2006 FEIR. The project includes many safety features to ensure safety and security within communities. See 2006 FEIR environmental compliance measures (2006 FEIR pages 4-8 and 4-9).

## Comment Set C4 Marie Hoch

**From:** Marie Hoch [mailto:mariekhoch@yahoo.com]  
**Sent:** Wednesday, April 02, 2008 1:05 PM  
**To:** info@sonomamarintrain.org; ccoursey@sonomamarintrain.org  
**Subject:** SMART train station in Hamilton..fee parking instead of free parking

To whom it may concern:

I am a Hamilton resident since 1999. I have read the Hamilton Reuse Plan. I think it would be a benefit to Hamilton and to southern Novato to locate a SMART station at Hamilton if the station is managed well.

C4-1

Hamilton was designed as a kind of walkable, new urbanism mixed use community. Houses are close together. The community was envisioned as transit friendly. All homes and even the commercial site is governed by transit friendly CC&Rs. The station site has always been designated as a transit station.

Quite a few of my neighbors commute to San Francisco or Southern Marin. If there was a station at Hamilton, a convenient schedule and if the train went to Larkspur, I would take it. I commute every day to Corte Madera, within walking distance of the ferry terminal. I would also consider taking a train to San Rafael and bicycling to Corte Madera if a dedicated bike route existed.

I would be much less likely to drive to San Marin to take a train. From Hamilton I could walk or bike to a station here. I would suggest that some kind of secure bicycle parking be provided. Perhaps there could be a web cam directed at the bicycle parking. I would be able to go online to see that my bicycle is secure.

C4-2

In order to discourage car traffic and parking, I would suggest that the station offer only paid parking. As a former planning commissioner I know there is always a cost to "free parking". Fee parking rather than free parking would encourage people to carpool, walk, take a shuttle or ride a bicycle to the station. It would minimize the traffic and number of cars entering Hamilton to access the train. It would be an important revenue source to provide supporting services to mitigate the impact of the station. Part of the parking fees could be used to monitor and maintain the station and perhaps run the feeder buses. This would help mitigate the fear of too much traffic, and the fear that the station will be a security risk to Hamilton residents.

C4-3

Hamilton is not a traditional suburb. Most of Novato is composed of traditional suburbs. Hamilton offers a different choice. Mixed use instead of residential only use. Small lots instead of larger ones. Transit friendly instead of car friendly.

Marie Hoch

## **Responses to Comment Set C4**

### **Marie Hoch**

- C4-1      The comment supporting a station at Hamilton is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.
- C4-2      As cited in the Draft SEIR document, SMART would install eight bike lockers at Hamilton, in addition to bike racks. SMART will address detailed security measures in the final engineering phase of the project, working in cooperation with local police departments and bicycle advocacy groups in the development of final recommendations on this issue. For more information, see page 3-62 in the 2005 DEIR regarding security.
- C4-3      Although paid parking is not contemplated at this time, the advantages are noted. It should be noted that that paid parking at only one station would not be appropriate but could be considered corridor-wide by the SMART Board of Directors at a future date.

## Comment Set C5 The Chitale Family

**From:** Gaurangi Chitale [mailto:gaurangi.chitale@gmail.com]  
**Sent:** Thursday, April 03, 2008 7:31 PM  
**To:** Kathy Cochran  
**Subject:** Opposing the Train Station in Hamilton

Dear SMART Board Representative:

I am a resident of Hamilton Field and I am writing to you to please reconsider the establishment of the train station here in Hamilton Field. The reasons our family moved to Hamilton Field was due to the fact that it is a quiet and safe community. It is secluded and not commercialized. It is a place where families can raise their children without much worries or fears. I think that in order to maintain this peaceful and secure environment, a train station should not be allowed in Hamilton Field. Please reconsider this decision on our behalf. Thank you.

C5-1

Regards,  
The Chitale Family

## **Responses to Comment Set C5**

### **The Chitale Family**

- C5-1        The comment opposing the Hamilton station site is noted. Please note that no decision has been made yet on the site for the Novato South rail station; comments on the merits of the proposed station will be considered by the SMART Board when making that decision. Also, please note that the Hamilton site is designated as a transit facility site in the community master plan.

## Comment Set C6 Allen Tacy

### SMART SEIR Comments

*Allen Tacy*

April, 2008

- SEIR fails to consider, and leaves unresolved, impacts of AB32 and related Greenhouse Gas Emission Goals set by Marin and Sonoma Counties. Suggest add the following paragraph:

CEQA Guidelines Section 15123 requires that Issues to be Resolved be summarized in an EIR. State law, AB32 (2007), requires that GHG emissions be reduced to 1990 levels by 2020. Marin and Sonoma go beyond AB32, targeting reductions 25% below 1990 levels by 2015. Transportation accounts for 60% of today's GHG in Sonoma, 62% in Marin. Dowling Associates on February 2, 2008 advised Sonoma County that GHG must be reduced 51% per person in order to achieve its goal. However you dice and slice that 51%, a large number of drivers must find another way to travel. SMART must plan higher service levels than considered when the EIR process began, in order to accommodate SMART's share of those drivers. At the same time, vehicle emissions become a higher priority than previously assumed when the time comes to select a SMART vehicle. Impact of these mandates may confidently be predicted to be both significant and beneficial.

- Analysis of the Downtown Novato station site is totally inadequate, based on false assumptions, and must be rejected. Dowling should be required to do it over.

- A. "No transit services currently serve the downtown station site." The SEIR gives no consideration to re-routing present services. In fact, Grant Avenue offers a very desirable transit routing simply because of the concentration of retail activity there. The proposed roundabout onsite could provide buses a place to turn around.
- B. "Bus access to the site is limited due to turning constraints on the downtown streets leading to Grant Avenue and the station." Oh, please. Please describe what limitation exists for turning off Redwood Blvd. onto Grant. There is none. We have heard this sort of argument from Golden Gate Transit and Sonoma County Transit in Petaluma about turning off Petaluma Blvd. onto B Street there. They've only been making that turn successfully since 1935. Despite GGT's recent claims that the turn is unsafe, there is no record, none, of accidents involving buses at that location. The claim that turns onto Grant are "constrained" is even more absurd. There is more turning space onto Grant than onto Petaluma Blvd.
- C. "Ridership of shuttles and use of other alternative modes (bicycle/pedestrian) is expected to be greater than at other alternative sites."
- D. "Absence of parking at this station site." False. A parking structure could be built on site, based on the present site of the demolished freight station, and extending over the proposed access drive. A parking lot could be situated between Madrone/Logan Drive and Highway 101, only one half block from the station. A small lot might lie between Rose Street and DeLong Avenue, again close to the station.

C6-1

C6-2

C6-3

C6-4

C6-5

**Comment Set C6, cont.**  
**Allen Tacy**

E. “Because of the cost and bus travel time associated with re-routing GGT transit buses from DeLong Avenue and/or Redwood Boulevard, it is unlikely that GGT would provide direct service to this station.” In fact, there is no reason why GGT Routes 70, 71, 80 should consider a re-route. There would be small demand for connecting service between SMART and these GGT buses at the Downtown site. The connection would be with Marin County Transit District bus routes Nos. 51, 52.

C6-6

F. Due to the above, proposed ridership at Downtown Novato requires substantial re-evaluation upward. “A population of 4,000 lives within a half-mile (air distance) of the Downtown Novato site, and a total of 15,600 within a mile, according to the 2000 Census. This is the highest number for any of the Novato South alternative station sites... This station has a significant number of residences and jobs within a reason-able walking distance. Because of this (alone, absent parking), Dowling Associates estimates this station site could achieve 160 to 180 boarding riders per typical weekday in 2025.”

C6-7

• Hamilton Station — recommend Option B because it provides access from both Main Gate and Hamilton Parkway. Also, the site should be constructed with the view to future expansion of the parking lot.

C6-8

• Weekend ridership — “The forecast of weekend project ridership used a factoring technique, based on the ratio of other commuter rail systems’ ratio of weekend to weekday ridership.”

C6-9

The SEIR factoring process completely divorces its predictions from the fact that Marin and Sonoma Counties offer the premier recreation destinations in the Bay Area, and attract thousands from the interior valleys. Historically, Northwestern Pacific Railroad had to steam up every possible locomotive, couple on the entire passenger car fleet, and even add flat cars with bench seats to handle the crowds on summer weekends. Freight trains were annulled so that passenger trains could be accommodated.

Automobiles changed that, but the crowds still swarm to Sonoma and Marin. The SEIR analysis is seriously flawed because it fails take into account our huge recreation traffic viz-a-viz rail systems elsewhere.

• SEIR fails to analyze differences in size between heavy and light DMUs.

C6-10

Heavy DMU: Height 14’ 11” Width 10’ 0” Floor height 51”

Light DMU: Height 13’ 10.5” Width 9’ 4” Floor height 24.6”

A. Smaller overall exterior dimensions of light DMU improves aesthetic visual

Comment Set C6, cont.  
Allen Tacy

impact vs. heavy DMU. Better “Wow” factor means more people say, “I want to ride that!”

C6-10 cont.

- B. Lower floor height of light DMU has two favorable impacts: (1) Lower station platform height. ADA requires station platforms for new starts such as SMART to be at or near floor height level for the full platform length. Longer ramps will be needed for the higher 51” platforms. (2) A 51” platform creates problems for freight when high/wide loads are handled. For example, steel wine storage tanks or steam generating plants. Such cargo will clear 24” platforms but may not 51”.

- SEIR fails to discuss the fact that the heavy DMU is in many ways a custom vehicle whereas the light DMU offers the virtues of mass production and proven reliability. The single heavy DMU sold to date required 18 months testing before being certified for regular service. Light DMU models have been in production for many years. The Siemens Desiro model uses mass production techniques and has been the catalog for at least eight years. The North San Diego District found no problems in tests of its Desiro.

C6-11

- SEIR pays lip service to the possibilities for Positive Train Control. This technology is an emerging standard. For 20 years it has been one of the two most desired achievements of the National Transportation Safety Board. Now that FRA has approved final testing for the entire Burlington Northern Santa Fe transcontinental system, final approval for commercialization is imminent. Certainly by the time SMART might place an order. PTC not only means that freight and passenger can operate on a single track throughout the day. Two Amtrak lines have been doing just that for several years now. It also means that the old fixed color signal masts presently required are obsolete and so is the cabling for them. Which means in turn that SMART can expand service frequency without having to install new masts or cables. More frequent service is something SMART will most probably have to do if Sonoma and Marin Counties are to achieve the Greenhouse Gas emissions reduction goals they have committed to reach.

C6-12

- SEIR makes false assumptions regarding headways and signaling.

C6-13

“The cumulative analysis also assumes that “following” trains, whether freight or passenger, may run no closer than 30 minutes behind their leaders. The reason for this is that 30-minute separations are used for the SMART passenger train schedule, and the signal system that controls all rail operations would be designed to support those 30-minute headways.”

On SMART’s single track, rail operations will be designed to support 15-minute headways because trains will be moving in opposing directions, as well as following. Freight cannot count on following a passenger for very long before the freight encounters an opposing passenger movement. This fact calls into question the following SEIR assumption:

“Hours of Freight Operation and System Capacity. Freight train service at the levels proposed by NCRA could be accommodated on the SMART right-of-way during daytime off-peak hours without the need for night trains.”

Trucking in the North Bay is notorious for one-way loaded movements without return

C6-14

**Comment Set C6, cont.**  
**Allen Tacy**

loads, compared to national norms. Partially this is due to the predominance of outbound loads, partially due to the use of specialized equipment for many shipments. SEIR makes no attempt to analyze North Bay trucking. Thus the following assumption is false for SMART territory:

C6-14 cont.

“**Truck Traffic Offsets.** ... Railcars are more likely to be returned empty (compared to trucks), so an equivalency of two trucks for each railcar movement has been assumed.”

“The amount of incremental reduction in vehicle trips depends on the types of goods carried and whether they were formerly carried by trucks or not. Generally speaking, for merchandise, one freight railcar can carry the equivalent of two freight trucks (see Assumptions in Section C.6.1).”

The paragraph on air quality assumptions contains this false assumption:

C6-15

“If NCRA’s freight operations were to use conventional locomotives, the rail transport emissions would likely exceed those of freight transport by truck.”

The American Association of Railroads states that conventional freight trains are three times as fuel efficient as trucks per ton-mile. The same ratio would apply to emissions as they are directly related.

There is a cumulative impact from the false assumption above, and the one regarding truck traffic offsets. Combined they result in emissions efficiencies far less favorable to rail than actual.

## **Responses to Comment Set C6**

### **Allen Tacy**

- C6-1 As explained in the 2005 DEIR and the DSEIR, SMART train service will reduce regional GHG emissions by diverting trips from motor vehicles to transit, especially during congested peak hours when GHG emissions tend to be highest, per mile driven, due to stop-and-go traffic. The SMART project thus furthers the goals of AB 32 and the general plans of Marin and Sonoma Counties.
- C6-2 The Draft SEIR statement is correct. The SEIR does not consider re-routing GGT bus routes, because SMART has no authority to do so. Although SMART's goal is the highest transit connectivity possible, it cannot ensure the actions of other independent agencies. Therefore, the SEIR does not rely on such service changes in the environmental analysis.
- It should be noted that a modern roundabout would not work at this location. An urban compact roundabout would require an outside curb diameter of at least 108 to 128 feet; this is not possible at this site.<sup>1</sup>
- C6-3 Through buses would have to loop around DeLong Avenue and Reichert, but then would have to turn left on Railroad Avenue north to Olive. This represents a significant deviation for a bus traveling on Redwood Blvd. A better option would be to provide a SMART shuttle that connects the rail station to the Grant/Redwood bus station. Railroad and Grant is a T intersection, so going straight ahead is not an option, nor is turning right (which leads to a cul-de-sac where DeLong Avenue is elevated).
- C6-4 The comment is noted.
- C6-5 Parking garages with very small floorplates are very costly to build per space, because much of the floor area gets used for interfloor circulation. There would also be aesthetic and urban design considerations of a tall parking garage at this location, which would probably have to exceed the height of surrounding structures. The suggested locations for parking lots could be pursued if the downtown station location were chosen.
- C6-6 Because of the added operating cost and bus travel time, it is unlikely that MCT would provide direct service to this station using MCT routes 51 or 52. See also response C6-2.
- C6-7 The SEIR preparers disagree with the conclusions in this comment. As acknowledged above, the Downtown Novato station site has a larger population within a mile radius, but is constrained by its lack of parking, resulting in lower ridership than the Hamilton site would have. Provision of parking was not part of the project description and so was not included in the ridership analysis.
- C6-8 The SEIR preparers agree that Hamilton Station site Option B provides the best circulation through the site.
- C6-9 Other passenger rail systems used as comparisons for weekend ridership also have recreational activities: Caltrain has downtown San Francisco and AT&T Park; Trinity Rail has the American Airlines stadium and downtown Dallas; and Florida Tri-Rail serves recreational and

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<sup>1</sup> See U.S. Department of Transportation, Federal Highway Administration. "Roundabouts: An Informational Guide," page 13. June 2000.

tourist areas. The DSEIR adequately accounted for recreational uses that would be served by the train in estimating weekend ridership.

C6-10 The purpose of the SEIR is to provide sufficient information to allow a reasonable analysis of the likely environmental effects of using light DMU vehicles. By the time a request for bids is issued, there may be new vehicles that are still on the drawing boards that may be worth considering. The ultimate vehicle selection will be made by the SMART Board and would be based on, among other things, public input, bid prices and operating characteristics, including operating cost.

Regarding the aesthetic differences, the comment is noted. See response C1-5 regarding level boarding.

C6-11 Both “heavy” and “light” DMUs are capable of providing service in the corridor. As noted in the comment, there may be advantages and disadvantages to each type of vehicle. Moreover, there may be advantages and disadvantages to the same basic vehicle type across different manufacturers. The purpose of the SEIR, however, is not to compare and contrast vehicles options across all criteria in order to make a recommendation on vehicle procurement. Rather, it is to examine the environmental impacts of the use of light DMU vehicles per CEQA.

C6-12 See response B5-20.

C6-13 See response B2-38 and B11-12.

C6-14 We are not aware of any quantified data bases of the directionality of loaded and unloaded backhauls. There is anecdotal evidence that the predominant shipment direction of goods produced in the region is outbound, but trucks also have a great deal of flexibility (not to mention financial incentive at current diesel prices) to accommodate different goods on backhaul. The assumption noted in the DSEIR is conservative and appropriate, contrary to the comment. Trucks carry most of the goods used by consumers in the region.

C6-15 See response C6-14 regarding the validity of truck trip offsets due to freight rail service. Section C.6.3.1 of the DSEIR identifies emissions from trucks that are expected to decline in the future as aggressive regulations controlling heavy-duty truck emissions take effect. These regulations are in place today so that the relative performance of trucks is expected to improve when compared to rail freight transport emissions. Section C.6.3.1 makes it clear that the U.S. EPA and CARB are working on emission reductions for locomotives to ensure that freight rail transport performance remains superior to trucks.

## Comment Set C7 Mandy Behbehani

**From:** MandyB [mailto:mandyb@pacbell.net]  
**Sent:** Wednesday, April 09, 2008 8:09 AM  
**To:** Kathy Cochran  
**Subject:** smart train

Hi Kathy:

I am a resident of the Sunny Cove subdivision on Hamilton and I am emailing you to protest the plans for trains - and ultimately huge, loud and dirty buses to come to Hamilton.

C7-1

We do not want where we live despoiled by vandals, diesel contamination, loud train and car horns etc. and the attendant traffic that a train station will incur.

C7-2

There are very few people who will ride it in the Marin and only a handful in Sonoma county. Why should we have to bear the brunt?

C7-3

Mandy

**Responses to Comment Set C7**  
**Mandy Behbehani**

- C7-1        This is not a comment on the DSEIR. Passenger rail service was analyzed in the 2006 FEIR and the only new or different project components considered in the SEIR are weekend service, alternative station sites for the Novato South station, and light DMUs. The project does not include “huge, loud and dirty buses to come to Hamilton.” Existing bus routes would serve the Hamilton station site. The proposed SMART shuttle that would serve the station would utilize a smaller vehicle.
- C7-2        The concerns expressed in the comment have been addressed in the analysis in the 2006 FEIR and the DSEIR. All impacts have been fully disclosed and mitigation for significant impacts has been identified.
- C7-3        This is not a comment on the adequacy of the DSEIR’s environmental analysis. The estimated ridership information (see 2005 DEIR) indicates that substantial numbers will ride the train in both Marin and Sonoma Counties.

**Comment Set C8**  
**Glenn Mitchell**

**From:** mitchsteel@comcast.net [mailto:mitchsteel@comcast.net]  
**Sent:** Wednesday, April 09, 2008 9:09 AM  
**To:** Kathy Cochran  
**Subject:** smart train

I have recently purchased a \$1,035,000 home in Hamilton. My plan was to raise my daughter within walking distance of Hamilton Elementary and walk her to and from school daily with our dog over the next 6 years. I am greatly opposed to the smart train and even more so of a Hamilton Station. Hamilton is a nice quiet south Novato neighborhood; I certainly do not want a train or a train station to disrupt our way of life. I will have to move, as will many of my neighbors, (so I've been told) if a Hamilton station is built. This upsets me, I don't want to move nor can I afford to move in this market. Please mark me down as adamantly opposed to both the Smart Train and the Hamilton Station. Sincerely, Glenn Mitchell

C8-1

Glenn Mitchell

## **Responses to Comment Set C8**

### **Glenn Mitchell**

- C8-1        The comment opposing the Hamilton station site is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site. The proposed SMART train has been planned on an existing rail corridor through Hamilton for many years. This is not new information, and the passenger rail service itself is not the subject of the DSEIR. (See Master Response 1.) The Hamilton station site is designated as a transit station on the Hamilton Master Plan and this information was made available to homeowners in the area.

## Comment Set C9 Douglas & Heather Evans

From: Heather Evans [<mailto:dchfamily@comcast.net>]  
Sent: Wednesday, April 09, 2008 9:48 AM  
To: Kathy Cochran  
Subject: Oppose Hamilton Station

Thank you for reading this note. We would like to let you know that we STRONGLY OPPOSE the idea of a station here at Hamilton. We purposely bought our home here to provide a safe and nurturing environment for our young children. The addition of a train station would be dangerous on so many fronts. This is not the appropriate place.

Thank you for your consideration and care,

Douglas and Heather Evans

C9-1

**Responses to Comment Set C9**  
**Douglas & Heather Evans**

C9-1        The comment opposing the Hamilton station site is noted. See response to comment C8-1.

Comment Set C10  
John Diamante



## Comments

(Please hand in your comment card before you leave.)

Please write any comments you have regarding the Draft Supplemental Environmental Impact Report.  
(Please note that written comments carry equal weight as verbal comments.)

NO SUBSTANTIVE ISSUE HAS BEEN RAISED BY THE SMART EIR, OR DSEIR, THAT HAS NOT BEEN DISCUSSED BY THIS COMMUNITY AND ALL MARIN AND SONOMA COMMUNITIES, IN PRIOR (HIVICAL; IM-SEC; CT SF-EUREKA INTERCITY FEASIBILITY; ETC.), ALL PARTY, LONG PROCESSES OF THE 1980s AND 1990s WHICH MANDATED RESUMPTION OF CORRIDOR RAILWAY SERVICES FOR THE PUBLIC (OUR) CONVENIENCE AND NECESSITY.

DELAYING THE RETURN OF OUR LEGACY, ONCE AND FUTURE STATE-OF-THE-ART RAILWAY NOW BOROERS IN PUBLIC NUIANCE; PERPETUATES OUR POLLUTING, CONGESTION, CARCINOGENIC, NOISY, UNSIGHTLY DEPENDENCE ON THE AUTOMOBILE, AND DELAYS NEWEST, CLEANEST, QUIETEST, SMARTEST OPERATING INNOVATIONS AND CONSIDERATIONS ON THIS TECHNOLOGICALLY "PIONEERING" RAILWAY. ALL ABOARD

C10-1

If you would like to receive emails from the SCTA, please write your name and email address here:

JOHN DIAMANTE  
THRESHOLD INT'L CTR.  
FOR ENVIRONMENTAL RENOVAL

**Responses to Comment Set C10**  
**John Diamante**

C10-1      The comment supporting the project is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.

Comment Set C11  
Elvera Berson



### Comments

(Please hand in your comment card before you leave.)

Please write any comments you have regarding the Draft Supplemental Environmental Impact Report.  
(Please note that written comments carry equal weight as verbal comments.)

- Well regards to the Hamilton Station, since it would serve the Sausal Novato area please identify number of ~~cars~~ cars that will enter and exit Hamilton in order to reach the Kraus. There are only 2 main access roads for Hamilton. Also, one of those roads (Hamilton Parkway) serves as a skate park which have many children.

- Will SMART allow the City of Novato to designate station rights? SMART has stated that in open meeting.  
Elvera Berson - Hamilton Resident

If you would like to receive emails from the SCTA, please write your name and email address here:

elvera1@bcglobal.net

C11-1

**Responses to Comment Set C11**  
**Elvera Berson**

C11-1      See Master Response 4. The SMART Board of Directors will make final station siting decisions with input from the City of Novato and other interested groups and citizens.

## Comment Set C12 John Marshall

**From:** John Marshall [mailto:jm@innmarin.com]  
**Sent:** Wednesday, April 09, 2008 12:21 PM  
**To:** Kathy Cochran  
**Cc:** DAthas@aol.com; Dana Marshall  
**Subject:** OPPOSITION TO HAMILTON STATION BY HOME AND BUSINESS OWNER

Dear SMART BOARD:

OPPOSITION to Hamilton Train Station and Transfer station:

We will not be able to attend this evening's public hearing due to work commitments at our places of business.

1. NIMBY – MY FAMILY'S HOME is located at 68 Marblehead lane, Novato 94949 is immediately adjacent to the proposed station location – At the time of purchasing our home and review of disclosures a train station was planned in Ignacio **not Hamilton!**
  - a. We purchased this home in May 2006 for the 270 degrees of immediate open space views and the train station would eliminate our desire to remain in our home and dramatically affect the value upon sale. Who will remunerate our family for this devastating impact? C12-1
  - b. We moved away from a home that was at an intersection and bus stop to be able to sleep through the night. Our master bed and bath face the recommended station. We currently keep our blinds open to enjoy the solitude and surrounding views; deer strolling by, jack rabbits foraging etc... We will need black out blinds in order to maintain our privacy and block parking and vehicle lights at night. Car parking and constant movement late and night and early in the morning would severely affect our QUALITY OF LIFE! C12-2
2. ACCESS – Station is too far from highway exits and feeder roads
  - a. The proposed station is .6 miles or more from either the Nave/North Hamilton intersection and well over 1.6 miles from Alameda del Prado and 1.2 Miles to the Ignacio Blvd intersection. C12-3
  - b. Feeder roads are all single lane in each which will cause severe back ups at every lighted intersection en route to and coming from the station unless the station is for Hamilton residents only – hardly. C12-4
3. TRAFFIC
  - a. As the parents of a 5 year old we look forward to walking with our daughter to Hamilton Elementary next year. Having lived in Hamilton for almost two years now it is a challenge enough to keep the appropriate distance and cross safely on Hamilton Parkway and Main Gate Road, the addition of more traffic to the exact center of where we walk to and from will make it more difficult and **LESS SAFE** to navigate traffic on foot and bicycle. The exact premise for us moving to Hamilton and the premise for the Hamilton development in the first place “LIVE & WORK COMMUNITY” NOT A TRANSPORTATION CENTER. C12-5

Comment Set C12, cont.  
John Marshall

4. VOTE

- a. We previously voted for the SMART train due to the awful highway backups on 101 going south and north knowing that a quiet DMU would be passing our home on a regular basis. I own two businesses in Novato and believe any improvement to our transportation backups is helpful. However, the proposed addition of a train station in our backyard forces us to change our two votes to oppose the SMART train. We will campaign and contribute extensively to the anti-SMART movement if the proposed train station is not relocated.

C12-6

Please reconsider the location of the second Novato SMART train station.

John Marshall  
**Rickey's Restaurant** - General Mgr.

[gm@rickeysrestaurant.com](mailto:gm@rickeysrestaurant.com)  
<http://www.rickeysrestaurant.com>

**Inn Marin** - Owner/Operator  
Rotary Club of Ignacio President 07-08

[jm@innmarin.com](mailto:jm@innmarin.com)  
<http://www.innmarin.com>

## Responses to Comment Set C12 John Marshall

- C12-1 The Hamilton Station site has been designated in local planning documents for future transit use since at least 1993; this is also reflected in the title documents for the property (see DSEIR, Section B.2.3.3). This site is not protected open space or park land. It is the site of a historic rail station complete with a road and decaying parking lot. Some residents have noted that the promise of a transit station was a factor in their decision to locate in Hamilton.
- C12-2 There is considerable evidence that proximity to rail transit stations has a *positive* impact on property values. As noted in SMART's FEIR in Master Response T on page 3-2.51, recent studies of rail systems in California by U.C. Berkeley professors Robert Cervero and Michael Duncan found premiums for both single family homes and condominium properties located within a ½ mile radius of stations. Access to transportation is valued in the real estate marketplace, and proximity to rail transit systems such as BART, Caltrain, ACE are all routinely trumpeted in the marketing of residential properties. See also response B3-27.
- To mitigate potential station impacts, SMART has proposed a landscape buffer between homes and the station.
- C12-3 The comment opposing the Hamilton station site is noted. See response to comment C8-1. Visual and noise impacts of the station are fully disclosed in the DSEIR. Visual impacts would not be significant due to station site design, which includes provisions to shield lighting and a landscape screen between homes and the station. Noise levels from station activities would not exceed thresholds for a significant impact.
- C12-4 The comment states the opinion that the station is "too far" from Highway 101 interchanges and feeder roads. Some of the distances are not correct, as the station (via Main Gate Road access) is approximately one mile from the Ignacio/Hamilton exit from Highway 101, not the 1.6 miles stated in the comment. The distance is not that material since many or most of the trips would not be accessing the station from Highway 101 anyway. No station site is perfect; all involve tradeoffs that will need to be considered by decisionmakers in selecting a site. With regard to single lane roads, the analysis showed that with modest mitigations these would adequately serve the station and its surrounding area in the future. The transportation analysis did not conclude that severe back ups would occur, as the comment suggests.
- C12-5 Main Gate Road is already a busy road; the addition of the traffic to the proposed station would be very small (less than five percent if Option B is selection), and the majority of station traffic would occur before or after the times parents/pupils would be traveling to Hamilton Elementary School. See response A5-2 and Master Response 4. It should be noted that the Hamilton Master Plan designates the Hamilton Station site for transit facilities.
- C12-6 Comment noted; this is not a comment on the DSEIR. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.

**Comment Set C13**  
**Ian Gillis**

**From:** Ian Gillis [mailto:ian.gillis@urbancommunitypartners.com]  
**Sent:** Saturday, April 12, 2008 3:56 PM  
**To:** Kathy Cochran  
**Cc:** mercita@horizoncable.com  
**Subject:** SMART station at Hamilton

I received a flyer on my door today (pdf attached) alerting me to the catastrophic impacts about to be inflicted on me as a Hamilton resident, should a new station be built at Hamilton!

C13-1

As a strong advocate of regional planning and sensible public transportation networks I am personally THRILLED at the prospect of a station at Hamilton where I could walk to a train, connect to a ferry and make my way to San Francisco.

A rail connection through Marin and Sonoma Counties makes incredible sense, particularly if you ever have to drive on 101.

Please put me on a list of supporters and let me know when critical meetings are to be held where you need some pro voices.

Regards

Ian Gillis

**Responses to Comment Set C13**  
**Ian Gillis**

- C13-1      The comment supporting the project and a station at Hamilton is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.

**Comment Set C14**  
**Diane Hartshorn**

**From:** Diane Hartshorn [mailto:hartshorn4good@yahoo.com]  
**Sent:** Monday, April 14, 2008 9:45 AM  
**To:** Kathy Cochran  
**Subject:** Oppose a Hamilton Station

Hi,

I live in Hamilton and strongly oppose a Hamilton Station. With a school at our gate, it would be unsafe to have a station. We already have the air porter and low income housing here; we do not want to be even more crowded.

C14-1

Regards,

Diane Hartshorn

## **Responses to Comment Set C14**

### **Diane Hartshorn**

- C14-1      The commenter is concerned about the safety of siting the Hamilton Station near schools. The location of the SMART rail corridor has not changed since the 2005 DEIR, only the proposed alternative location of the Novato South Station has changed to be potentially located at the Hamilton Station site. Should the Hamilton Station location be selected, this would have the effect of slowing train traffic in the vicinity of the Hamilton Station because trains would stop at the station rather than pass through the location at speed. No additional impacts on public safety from the SMART rail corridor are created in the vicinity of the three schools and one daycare facility nearby the Hamilton Station. In addition, please see responses A1-21 and C18-19 and Master Response 4.

**Comment Set C15**  
**Robert L. Belichick**

**From:** Robert Belichick [mailto:belichick@sbcglobal.net]  
**Sent:** Monday, April 14, 2008 9:57 AM  
**To:** Kathy Cochran  
**Subject:** Hamilton Station

I am writing to support the train and the train station at Hamilton Field. It is long past due for a public transportation system that can be integrated with other means of movement other than highways.

I oppose those people using specious arguments throwing in "children" as a red herring. The pollution from automobiles on Highway 101 is far more serious than the limited train traffic. Trains will ultimately reduce auto traffic as well as the cost of gasoline will affect trips on the highway.

What better solution is there than a transit alternative through Marin that will be a necessity as people cannot afford to drive to and from Marin, given the increasing costs of going into San Francisco with higher tolls there as well.

I say, "Build the Train Station now." Give us an option. I live at Hamilton Field.

Robert L. Belichick

**Robert L. Belichick**

C15-1

**Responses to Comment Set C15**  
**Robert L. Belichick**

- C15-1      The comment supporting the project and a station at Hamilton is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.

Comment Set C16  
Mercita Oliva

**From:** mercita [mailto:mercita@horizoncable.com]  
**Sent:** Tuesday, April 15, 2008 12:09 PM  
**To:** Kathy Cochran; novatocouncil@ci.novato.ca.us  
**Cc:** ian.gillis@urbancommunitypartners.com  
**Subject:** Hamilton Smart Station

I am a registered voter of Novato and a Hamilton Field resident. I am very much a proponent of the Sonoma Marin Train!

The claims being made regarding the so called 'Dangers' of having the station located in Hamilton are preposterous. The flyer that we received on our door represents a selfish and very short sided view from a so called 'environmentally conscious community!'

Let's start seeing some factual information and comparables that show this much needed form of transportation to be a viable, safe, profitable (tourism), economical, environmentally conscious and **"SMART" means of travel**. These local opponents have already a proven success in alarming the public with some unsubstantiated and uneducated information.

The positive aspects of this opportunity far out weight the negatives. The communities need to be educated and enlightened with the Good News before it's too late!

Thank you,  
Mercita Oliva

C16-1

**Responses to Comment Set C16**  
**Mercita Oliva**

- C16-1      The comment supporting the project and a station at Hamilton is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site. It is noted that the claims made in the referenced flyer that was distributed in the Hamilton community included incorrect facts. Correct facts and analysis regarding safety, noise, air pollution and traffic are contained in the 2006 FEIR and in the DSEIR.

Comment Set C17  
Ralf Knoesel

**From:** rknoesel@gmail.com [mailto:rknoesel@gmail.com] **On Behalf Of** Ralf Knoesel  
**Sent:** Tuesday, April 15, 2008 1:52 PM  
**To:** Kathy Cochran  
**Subject:** I support a Hamilton SMART station

A SMART station in Hamilton would be a step in the right direction to ease future congestion problems on 101. Additionally, being a resident of Hamilton myself, and a supporter of public transportation, I definitely plan on making good use of such a station to reach shopping areas south of here.

C17-1

Ralf Knoesel

**Responses to Comment Set C17**  
**Ralf Knoesel**

- C17-1      The comment supporting the project and a station at Hamilton is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.

Comment Set C18  
Patricia S. Cockerham

April 13, 2008

Sonoma-Marín Area Rail Transit District  
Attention: Lillian Haymes, General Manager  
750 Lindero Street, Suite 200  
San Rafael, California 94901

Dear Ms. Haymes and SMART Board Members,

The following provides comments on the 2008 Draft SEIR.

**OVERALL REMARKS**

**SMART is a “Wizard of Oz transportation plan”:** it looks and sounds great until you “pull back the curtain” to reveal a program that provides benefit for very few, alarming health and safety issues for many, and an enormous price tag for all.

If the Board decides to place SMART on the 2008 ballot, then the Board must be certain that the SMART-freight plan is a reasonable transportation measure.

And if the Board is certain that the SMART-freight plan is a reasonable measure, then the measure must provide “traffic relief”, “cleaner air” and “affordable transit”, as [www.gosmarttrain.com](http://www.gosmarttrain.com) explicitly states and the 2006 ballot measure and 2008 SEIR imply.

The SMART-freight plan identified in the SEIR **does not** provide “traffic relief”, “cleaner air” OR “affordable transit”:

- SMART **does not** provide “traffic relief”:
  - One SMART train can “free” less than 0.2 miles of the 70 miles of highway it parallels.<sup>2</sup>
- SMART **does not** provide “cleaner air”; it causes cancer, birth defects, lung damage and respiratory problems:
  - SEIR acknowledges that the combined SMART-freight air quality will cause “**significant**” **cancer deaths**:
    - “Health risks of 10 excess cancer cases per million for people who live and work near the tracks”<sup>3</sup> (SEIR C.6-12)
    - “Higher exposures could occur in locations where trains idle if sensitive receptors are nearby” (SEIR C6-11)
    - “If locomotives are used that do not meet NCRA’s specifications...the increased level of freight service would cause the significance criteria of 10 excess cancer cases per million to be exceeded.” (SEIR C.6-11)

C18-1

C18-2

<sup>2</sup> One light 2-car DMU carries 260 passengers; a heavy 3-car DMU can carry 270 (SEIR, C.4.1). Assuming every train is full, each passenger represents a loss of one car, the average car is 15 feet long and Highway 101 is four lanes wide, a light DMU train “frees” 975 feet (less than 0.2 mile) of highway space. This number would be less if the train is not full or if some of the passengers would otherwise be carpoolers or bus riders. Using the same assumptions, a heavy DMU train also “frees” less than 0.2 mile of highway.

<sup>3</sup> NOTE: the significance criteria is 10 excess cancer deaths per million

Comment Set C18, cont.  
Patricia S. Cockerham

- Although not mentioned in the SEIR (though it should), California’s Proposition 65 Warning and the Environmental Protection Agency (EPA) both warn that SMART-freight plan will also cause **birth defects, reproductive harm, lung damage, respiratory problems, and worsened asthma and allergies**<sup>4</sup>:
- SMART **does not** provide “affordable transit”:
  - At a price of somewhere over \$1.4 billion, every Sonoma and Marin household will pay more than \$4900 for SMART

C18-3

C18-4

Since SMART **does not** provide traffic relief, clean air OR affordable transit, it is **not** a reasonable transportation measure. And the Board **can not**, in good conscience, place the measure on the 2008 ballot.

**SEIR DOES NOT DISCLOSE SIGNIFICANT CHANGES & CRITICAL INFORMATION ABOUT COSTS**

C18-5

If a SEIR is intended to fully disclose significant changes and critical information to the taxpayers who will fund the measure, then the SMART SEIR should accurately reveal information about the project’s costs.

The SEIR **does not** update the measure’s cost despite significant project modifications and changes in circumstances:

- The potential replacement of heavy to light DMUs must impact capital and operational costs
- Weekend service will certainly require incremental costs
- A variety of station option size and complexities in the South Novato station alternatives would certainly have different costs than the Roblar Drive station identified in the previous EIRs.
- The costs of manpower and materials cannot be the same as when they were projected for the 2005 DEIR

Since the SEIR **does not** update the measure’s costs, then it **does not** fully disclose significant changes and critical information to the taxpayers who will fund the measure.

**SEIR DOES NOT PROVIDE CRITICAL – OR ACCURATE - INFORMATION ABOUT NCRA AND FREIGHT:**

C18-6

If a SEIR is intended to fully disclose significant changes and critical information to the taxpayers who will fund the measure, then the SMART SEIR should accurately reveal significant changes and information about the NCRA.

The SEIR **does not** reveal critical information about the NCRA’s environmental or ethical “track record”:

- The NCRA is the only railway to be closed down by the Federal Railway Authority (for toxic spills)
- NCRA’s projected business plans and schedule were dramatically different than depending on the audience: Eureka, Sacramento and Willitts heard different numbers than and the Bay Area

<sup>4</sup> California’s Proposition 65 Warning states: “Railroad locomotives and related equipment used in transporting goods and passengers are powered by diesel engines and emit diesel exhaust. Diesel exhaust is a chemical known to the State of California to cause cancer, and contains chemicals known to cause birth defects or other reproductive harm.” And the Environmental Protection Agency (EPA) states: “Exposure to diesel exhaust can cause lung damage and respiratory problems. Diesel exhaust also exacerbates asthma and existing allergies, and long term exposure is thought to increase the risk of lung cancer.”

Comment Set C18, cont.  
Patricia S. Cockerham

provided in the 2006 FEIR.

- If SMART wasn't able to obtain a truthful estimate on the NCRA's business plans, then it's unlikely that SMART will be able to "control" the NCRA in the future.

C18-6 cont.

The SEIR **does not** reveal s NCRA's recent litigation:

- The NCRA is in a lawsuit with the City of Novato with amicus support from the Marin County Supervisors for not meeting CEQA requirements in development of their EIR

C18-7

The SEIR **inaccurately assumes** that every freight train will reduce diesel emissions:

- Since there are no trucks going back and forth to the Island Mountain Quarry, all freight to and from the quarry is incremental
- Most freight trips will be "full" one way and empty on the return trip
- If Humboldt Bay port is built (and key members of the NWP have a financial incentive to ensure that happens), truck and freight traffic will increase, and diesel emissions will increase

C18-8

Since the SEIR **does not** accurately reveal critical information about the NCRA's environmental or ethical track record and it's likely diesel emissions, then it **does not** fully disclose significant changes and critical information to the taxpayers who will fund the measure.

C18-9

**SEIR DOES NOT MITIGATE HEALTH & NOISE ISSUES ASSOCIATED WITH FREIGHT**

If SMART were committed to being "clean" and "good for the environment", then the SMART SEIR should attempt to alleviate the serious health and noise issues associated with freight.

C18-10

The SEIR **does not** attempt t alleviate the serious health issues associated with the passenger-freight plan:

- "Health risks of 10 excess cancer cases per million for people who live and work near the tracks" (SEIR C.6-12)
- "With the 0.8 excess cancer cases caused by SMART trains, the combination of freight and passenger rain service along this segment [between Santa Rosa and the Ignacio Wye] would result in a maximum of 8.8 maximum excess cancer cases per million at 30 feet from the tracks... Higher exposures could occur in locations where trains idle if sensitive receptors are nearby." (C.6-10 &11)
- "The combined cancer risk of the NCRA proposed freight service and the SMART project with weekend service would be 9.2 excess cancer cases per million people at a distance of 30 feet from the tracks." (SEIR C.6-13)
- Beside causing cancer, diesel exhaust freight trains (an essential part of the SMART plan) are linked to birth defects, reproductive harm, lung damage, respiratory problems, and worsened asthma and allergies:

C18-11

California's Proposition 65 Warning states:

"Railroad locomotives and related equipment used in transporting goods and passengers are powered by diesel engines and emit diesel exhaust. Diesel exhaust is a chemical known to the State of California to cause cancer, and contains chemicals known to cause birth defects or other reproductive harm."

The EPA states:

"Exposure to diesel exhaust can cause lung damage and respiratory problems. Diesel exhaust also exacerbates asthma and existing allergies, and long term exposure is thought to increase the risk of lung cancer."

The SEIR **does not** attempt to mitigate the "significant and unavoidable noise" associated with

C18-12

Comment Set C18, cont.  
Patricia S. Cockerham

freight (including nighttime freight from Cloverdale to Novato).

- “A permanent increase in ambient noise levels in some segments of sensitive receptors within 50 feet of the tracks” that is “significant and unavoidable” (SEIR C.6-13)
- “... a total of eight roundtrips (16 train movements) per day” and “...some of the freight trains would likely operate during nighttime hours” (SEIR C.6-7)
- “The freight operator may nevertheless opt to run freight trains at night for independent operational needs.” (SEIR C.6.2)
- The SEIR **does not** provide critical information about “ambient” and train horn noises and Quiet Zone funding
  - The report states that train horn noise is “significant” and that the “combined passenger and freight operations would result in a permanent increase in ambient noise levels ... (significant unavoidable)” (SEIR C.6-13), yet it does not specify the resulting impact of the significant increase in noise levels (hearing loss, etc.)
  - The SEIR (and previous EIRs) provides no information about the cost & liability of Quiet Zones:
    - What is the total cost of construction, maintenance, and liability associated with each Quiet Zone?
    - Is SMART (or rather the taxpayer) paying for all of the constructions costs at each of the 68 crossings? If not, how many will be funded by SMART?
    - Is SMART (or rather the taxpayer) paying for all of the liability costs at each of the 68 crossings? If not, how much liability will SMART support?
    - If SMART (or rather the taxpayer) does not pay for Quiet Zones, who must bear the costs?
    - Given that many cities are living with tight budgets, do you believe that the cities have the level of funding required for Quiet Zones?
    - Will the Quiet Zones be fully approved and installed before freight begins? Before SMART begins?
    - What other key issues does the voter need to know about Quiet Zones (i.e. does each require a lengthy approval process from a government agency)

C18-12 cont.

C18-13

Since the SEIR **does not** attempt to alleviate the serious health risks associated with freight or the “significant and unavoidable noise” associated with freight (including nighttime freight from Cloverdale to Novato), then it **is not** “clean” and “good for the environment”..

C18-14

**SEIR SHOWS NO NEED FOR A SOUTH NOVATO STATION**

If transportation experts hired by the SMART Board found that very few people would use a proposed station, then there is no need for that station.

The 2006 Final EIR ridership analysis prepared by Dowling Associates, respected transportation experts<sup>5</sup>, found that very few people would use a South Novato station:

- **Less than 50 people** (1.8% of the projected number of passengers) would use a South Novato station (FEIR 3.2-12)
- No station (except for Cloverdale, at the “end of the line”) would have fewer riders.
- **Each of the other twelve stations** were projected to have **two to nine times** the number of

C18-15

<sup>5</sup> According to their website, Dowling Associates is a 22-year old traffic engineering and transportation planning consulting firm that employs over 30 full-time professional and support staff, many of whom are certified civil engineers, certified traffic engineers and AICP certified planners. Their clients include the Federal Highway Administration, the National Academy of Sciences, Caltrans, Florida DOT, the University of California, and numerous cities, counties, and metropolitan planning organizations.

Comment Set C18, cont.  
Patricia S. Cockerham

riders

Since transportation experts hired by the SMART Board found that very few people would use a South Novato station, there is no need for a South Novato station.

C18-15 cont.

Further, if the handful of potential central or south Novato/north San Rafael residents want to use the train, there are two nearby stations less than 5 miles away. This distance is still less than the distance between Cloverdale and Healdsburg stations (17 miles) and the Petaluma and Novato North stations (10 miles) and is similar to the distance between Windsor to Jennings Avenue-Santa Rosa stations (8 miles).

**SEIR DOESN'T PROVIDE CRITICAL – OR ACCURATE - INFORMATION ABOUT THE HAMILTON STATION:**

C18-16

If the SEIR is intended to accurately assess the merits of a station location, it must accurately identify the critical facts associated with that station.

The SEIR *“missed” two nearby schools*, Hamilton Elementary and Nexus Academy, *and 528 school children* when it evaluated the Hamilton station site.

Further, the SEIR *increased South Hamilton ridership without cause*:

- The SEIR shifted the proposed South Novato station *1/3 of a mile* to Hamilton (further from the highway, the vast majority of the Novato population and the Bel Marin Keys business park), while *it nearly tripled the projected number of riders*.

C18-17

Since the SEIR apparently “missed” 528 nearby school children and arbitrarily increased ridership at the Hamilton Station, it’s assessment on the merits of the Hamilton station is *not* accurate.

**SEIR DOES NOT REVEAL THAT HAMILTON IS AN UNSAFE & UNWISE STATION LOCATION**

C18-18

If the SMART Board were concerned about the health and safety of the people nearby, then it would not locate a station near “sensitive receptors” (defined in the SEIR as “homes, schools, parks or hospitals”). It states:

*“Higher exposures [of carbon monoxide] could occur in locations where trains idle if sensitive receptors are nearby”*

**Yet, the SEIR proposes placing the Hamilton station – with idling trains and added traffic and a potential bus transfer station - near several homes, *THREE* schools, one day care center, playgrounds and an athletic field.** The schools and day care are:

C18-19

- Nexus Academy (931 C Street), about 22 children
- Novato Charter School (936 C Street), about 237 children
- Hamilton Elementary (1 Main Gate Road), about 506 children
- North Bay Children’s Center (932 C Street)

**It’s better to be safe than sorry.** Think of the potential dangers:

- A generation of Hamilton school children – or entire families - dealing with severe asthma and allergies
- A 6-year old boy killed by a car racing to catch a train

Comment Set C18, cont.  
Patricia S. Cockerham

- A 10-year old girl unable to participate in the school musical with her best friends because she is in the hospital battling lung cancer
- An unfortunate encounter between a 12-year old girl and someone who decides to seek shelter in the protected station

C18-19 cont.

In addition to the obvious safety issues, there are several other issues associated with the site:

- Floodlights shining into homes
- Vandalism
- Loss natural habitat
- Inconvenient location (miles from most of Novato’s population)
- Inconvenient access to the station for riders who need to drive there (stop lights, stop signs, residential streets, off-highway location)

C18-20

C18-21

C18-22

C18-23

Since the Board is willing to place a train station (and potential bus transit station) near several homes, three schools, one day care center, playgrounds and an athletic field, it clearly is *not concerned* about the safety or health of the people in the nearby homes, schools or parks.

C18-24

**SEIR INFLATES IT’S CONTRIBUTION TO “REDUCING TRAFFIC CONGESTION”:**

The SEIR claims: “Any of the Hamilton sub-alternatives...have the highest rail ridership, and therefore would have the greatest impact of reducing VMT and congestion on Highway 101.” (C.5-59)

C18-25

If the presence of a train station “reduces congestion on Highway 101”, then it must “free” a significant amount of highway space.

The Hamilton station *will not* “free” a significant amount of highway: 46 riders<sup>6</sup>, each abandoning a 15 foot passenger car on the four-lane stretch of Highway 101 would “free” 56 feet or 0.01 mile of highway.

Since a South Novato SMART station will only “free” 56 feet of highway space, the SEIR *cannot* say it will “reduce congestion on Highway 101”.

**SUMMARY**

SMART is a “Wizard of Oz transportation plan”: it looks and sounds great until you “pull back the curtain” to reveal a program that provides benefit for very few, alarming health and safety issues for many, and an enormous price tag for all.

C18-26

Since SMART *does not* provide traffic relief, clean air or affordable transit, the Board *can not* believe that SMART is an excellent transportation measure. And the Board *can not*, in good conscience, place the measure on the 2008 ballot.

Sincerely yours,

Patricia S. Cockerham

<sup>6</sup> Number of people projected to ride a train from the South Novato station each day (FEIR)

## Responses to Comment Set C18

### Patricia S. Cockerman

- C18-1 Please note that the SMART passenger rail proposal and the NCRA freight proposal are two separate and distinct plans that can operate independently of each other. See Master Response 2. The comparison provided in the comment is not based on any accepted transportation methodology and is both irrelevant and incorrect. Note that a vehicle moving 65 mph will require at least 150 feet of road space at the break between LOS C and D, the level at which speeds begin to decline due to traffic congestion, according to the *Highway Capacity Manual 2000*.
- C18-2 Section C.6.3.1 of the DSEIR discloses the potential health risks of freight rail service proposed by NCRA as it may occur in the cumulative context. Because passenger rail service would not individually result in a significant impact from localized contaminants, cumulative air quality impacts driven primarily by the freight service would not be within the jurisdiction of SMART to mitigate. NCRA would be responsible for implementing all feasible mitigation measures to mitigate the impacts associated with freight rail service. NCRA is in the process of preparing its own EIR to evaluate the environmental impacts of freight service, including its contribution to a cumulative air quality impact. It is important to note that all cumulative air quality impacts of passenger rail service combined with NCRA's proposed freight rail service are less than significant. In addition, freight trains will not operate south of Highway 37 in Novato.
- C18-3 See response A1-7 for information on applicable requirements under Proposition 65.
- C18-4 This is not a comment on the adequacy of the DSEIR's environmental analysis. The cost of SMART for riders (fares) will be comparable to Golden Gate bus service. The cost to taxpayers will be the proposed local ¼ cent sales tax. Sales tax increments are a common means of funding transportation improvements in the Bay Area. The recent ½ cent sales tax passed in 2004 in Marin County (Measure A) is an example. About half of that sales tax revenue goes to preserving local bus service. The cost estimate per household provided in the comment is not accurate. Among other things, it does not consider: capital funds already secured by SMART, fare revenue and other revenues that will be generated by the project. In addition, the comment does not address the fact that the tourists, travelers, and employees who work in the District also pay sales taxes, and the fact that the number of households within the District is projected to grow over the life of the tax measure, based on the projections in local general plans.
- C18-5 A discussion of project costs in the environmental document is not required by CEQA. However, for information purposes please see the 2008 SMART Expenditure Plan or the 2008 SMART Funding Plan.
- C18-6 The comment's statements regarding NCRA are not comments on the adequacy of SMART's DSEIR environmental analysis; no further response is warranted. It should be noted that information regarding the FRA's suspension of NCRA's operations in 2001 appears on page B-19 of the DSEIR; information regarding NCRA's various long-term planning documents appears on pages B-22 and B-23.
- C18-7 Comment noted. The lawsuit between the City of Novato and NCRA does not affect the environmental analysis provided in SMART's DSEIR, which, among other things, evaluates the potential environmental effects of reasonably foreseeable freight operations on the rail line shared by the two projects between Cloverdale and the Ignacio Wye (at Highway 37). See also Master Response 2.

- C18-8 See DSEIR Section C.6.2.2 regarding truck offsets in Speculative Scenario 1. See Section C.6.1 regarding general truck offset assumptions, including the assumption that some freight return trips would be empty. As noted in the DSEIR, impacts associated with freight rail service north of Willits are not reasonably foreseeable cumulative impacts. See Master Response 2.
- C18-9 NCRA's environmental and ethical track record is not within the scope of the DSEIR and is not appropriate for inclusion in the SMART DSEIR. All cumulative environmental effects, including diesel emissions, are fully disclosed in the 2006 SMART FEIR and the SMART DSEIR. See DSEIR Section C.6.
- C18-10 See response C18-2.
- C18-11 Health risks associated with diesel exhaust are fully described in the 2005 DEIR (p. 3-74) and in the 2006 FEIR (p. 4-38). See also response C18-2 regarding disclosure of health risks associated with air emissions from the freight service, and see response A1-7 regarding warnings required under Proposition 65.
- C18-12 Section C.6.4.1 of the DSEIR discloses the potential noise impacts of freight service in the cumulative context. CEQA requires SMART to mitigate its own project-level impacts and any cumulatively considerable contribution it makes to a cumulative impact. NCRA, not SMART, is responsible for mitigating the impacts of NCRA's proposed freight service. See also Master Response 2.
- C18-13 The 2005 DEIR (p. 3-138) and 2006 FEIR (Master Response Q, p. 3.2-44) and Master Response 5 identify Quiet Zones as a way of reducing the noise impact and provide details about the implementation of Quiet Zones. The SMART 2006 FEIR and current DSEIR both identify train horn noise as significant partially because of the fact that implementation of Quiet Zones at every location is not certain.
- C18-14 The SMART project is not the cause of impacts associated with freight. Mitigation measures for the proposed freight operations are the responsibility of NCRA and its operator, NWP Co.
- C18-15 This is an opinion of the commenter. The Hamilton Station site would have a ridership comparable to downtown San Rafael. The cited page of the FEIR (page 3.2-12) indicates that there would be 93 daily boardings at the Roblar Drive Station. The statement that "less than 50 people would use a South Novato Station" is not correct; the potential Downtown and Hamilton Stations would both have greater ridership.
- C18-16 See response A1-21. The two schools referenced in the comment are noted. Hamilton Elementary School is not within close proximity to the Hamilton station site, but is now mentioned in the text of the SEIR. The Nexus Academy is not adjacent to the station site and is closing, as of June 2008, according to its website.
- C18-17 The air (straight-line) distance between the Roblar Drive Station (analyzed in the 2005 DEIR and 2006 FEIR) and the Hamilton Station is approximately 0.9 miles, not 1/3 mile, as stated in the comment. The additional ridership at Hamilton is a result of more residents being able to walk or bicycle to the station than the Roblar site and a higher net job density.
- C18-18 See response A5-3.

- C18-19 Health risks, including incidences of asthma and allergies, associated with air emissions from the passenger service at the Hamilton site are shown to be less than significant (DSEIR Section C.3.2 and Section C.5.3.2).
- See response A1-22 regarding station security. See response A1-21 regarding safety around Hamilton Station. The safety of the rail line was fully assessed in the 2006 certified FEIR; all public safety impacts were determined to be less than significant. See 2006 FEIR Master Response P.
- C18-20 Visual impacts and mitigation associated with station lighting are fully addressed in the Draft SEIR in Section C.5.3.10. Lights will be shielded and a landscaped buffer between the station and homes will be installed.
- C18-21 SMART will maintain its station area and will provide for security at stations as noted on page 2-62 of the 2005 DEIR. Master Response P in the 2006 FEIR also addresses security responsibilities for SMART facilities.
- C18-22 Potential loss of natural habitat and associated mitigation at the Hamilton station site is addressed in Section C.5.3.3 of the Draft SEIR.
- C18-23 The SEIR notes that 10,100 people currently live within a mile of the Hamilton Station site, with the possibility of more in the future. No single station site is going to serve the majority of Novato’s 52,000 residents.
- C18-24 The SMART Board is concerned with public safety, which was one of the major design criteria for the SMART project. In addition, please see responses A1-21 and A1-22 and 2006 FEIR Master Response P. Please note that the station site is designated as a transit facility in the community master plan.
- C18-25 See response C18-1. Again, this comparison is inaccurate. The simple conclusion remains: the higher the ridership at a rail station, the greater the potential for traffic congestion relief. The concepts used of “freeing” and “distance” are irrelevant and have no bearing on the decision at hand.
- C18-26 The project’s benefits, including benefits in transportation and air quality, are clearly outlined in the 2005 Draft EIR and 2006 Final EIR.

Comment Set C19  
Robert & Nannette Brown

**Robert and Nannette Brown**

April 16, 2008

Lillian Hames  
SMART General Manager  
750 Lindero Street #200  
San Rafael, CA 94901

**RE: Supplemental Environmental Impact Report (SCH 2002112033)**

Dear Lillian:

Thank you for the opportunity to respond to SMART's Supplemental EIR and particularly for the analysis of alternative station locations for South Novato. The following are questions for which I would appreciate response in the Final EIR, most of which relate to the Hamilton station analysis:

1. A correction – on Page C.5-33 the text states that the Hamilton Shuttle is funded by the City of Novato. Actually, the shuttle service is a requirement of the City's Master Plan but is funded by the Hamilton Field Owners Association. C19-1
2. I have the following questions regarding the ridership projections on Page C.5-34: C19-2
  - a. The description of current and anticipated residents and employees surrounding the proposed Hamilton station location on Page C.5-33 is confusing, referring both to Census 2000 numbers and figures from the Hamilton Field Plan and Hamilton Army Airfield Reuse Plan. What are the numbers of residents and employees used in the ridership projections, and are these based on a half-mile distance from the proposed station location or from the Hamilton Shuttle stops?
  - b. How many of the projected riders accessing SMART at the proposed Hamilton station reside outside of the Hamilton development? C19-3
  - c. How sensitive are the ridership projections to increases in gasoline prices, and do the projections contained in the SEIR reflect the recent increases in fuel prices? C19-4
  - d. Attached is a summary of a recent survey of Hamilton Landing employees commissioned by Barker Pacific. The survey indicates that 41% of employees would take the SMART train 3 to 5 days per week if there is a station at Hamilton (equating to 676 round-trip daily boardings by Hamilton employees at full occupancy of the office development). How do these survey results compare with the ridership estimates in the SEIR which indicate a range of 88 to 127 employee boardings (I am uncertain as to whether these figures are C19-5

Comment Set C19, cont.  
Robert & Nannette Brown

one-way or round-trip boardings)? Are the ridership estimates too conservative given the expressed interest of Hamilton Landing employees in commute alternatives, local freeway congestion and increases in gasoline prices?

C19-5 cont.

e. Was the existence of the Hamilton shuttle and the anticipated increase in shuttle frequency due to SMART funding taken into account in the ridership estimates?

C19-6

3. The traffic analysis summarized on Pages C.5-33 through C.5-35 does not seem to take into account trip reduction from Hamilton residents and employees using the train and shuttle. Please identify the assumptions related to trip generation and distribution:

C19-7

a. How many vehicular trips are being assumed to and from the station due to anticipated riders from outside the Hamilton development?

b. What is the potential for trip reduction from residents and employees using the shuttle to access the site and thereby eliminating existing vehicular trips to and from Hamilton?

4. The noise analysis summarized on Pages C.5-44 and -45 indicates that ambient noise levels were based on prior readings from the Roblar/Nave Drive location. I do not believe that it is reasonable to assume similarities between the former Roblar station location and the Hamilton station in terms of the noise environment. I would request a site-specific noise analysis be performed, indicating the expected increase in noise levels at the closest residence and school due to the potential station operations, as opposed to operation of the rail line through Hamilton.

C19-8

Many thanks in advance for your further attention to these issues.

Sincerely,

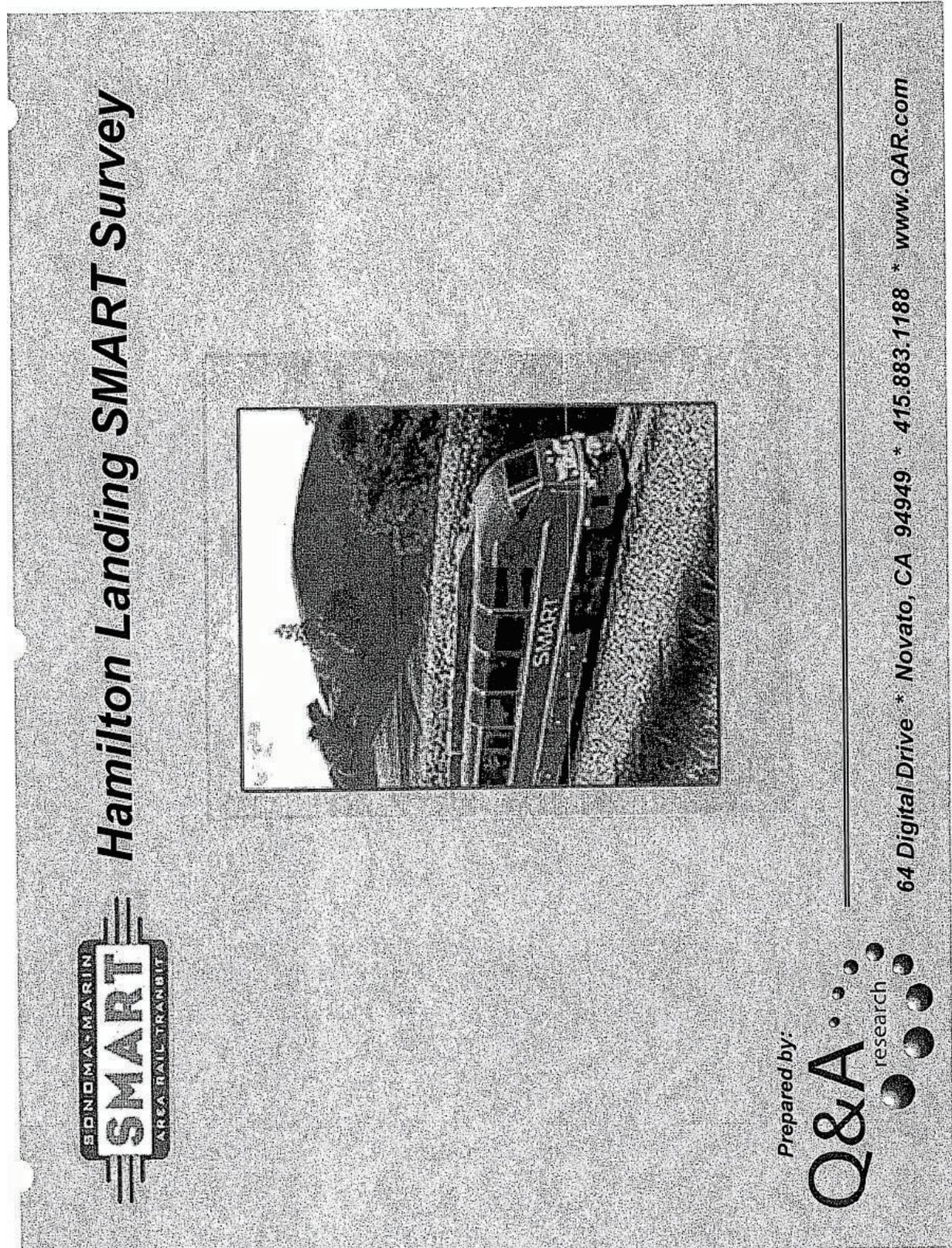


Bob Brown

enclosure

cc: Novato City Council  
David Wallace, Novato Community Development Director

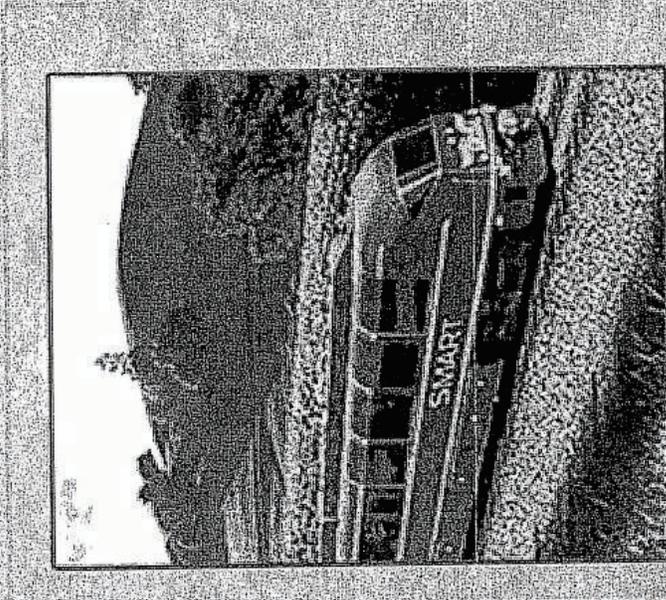
Comment Set C19, cont.  
Robert & Nannette Brown



The graphic features a central photograph of a SMART train car on a track, with the word "SMART" visible on its side. To the left of the photo is the SMART logo, which includes the text "SONOMA-MARIN AREA RAIL TRANSIT" and "SMART" in a stylized font. To the right of the photo is the title "Hamilton Landing SMART Survey" written vertically. At the bottom right, there is contact information for Q&A research, including a phone number and a website URL.



*Hamilton Landing SMART Survey*



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Comment Set C19, cont.  
Robert & Nannette Brown



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Comment Set C19, cont.  
Robert & Nannette Brown



Introduction

**Background and Objectives**

- Sonoma-Marín Area Rail Transit (SMART) is a proposed rail system for Marin and Sonoma counties that would connect Cloverdale to Larkspur with 14 stations. This rail system would be designed to alleviate traffic congestion, lessen air pollution, add a 70-mile bike and pedestrian pathway, and reduce pressure to develop housing on open space.
- Two of the 14 SMART stations would be located in Novato; Hamilton Landing is one of four locations under consideration for these stations. The objective of this research is to gauge interest in a Hamilton Landing SMART station in order to help guide the Novato City Council in making a site recommendation and final board decision.

**Methodology**

- In order to meet the objective as described above, Barker Pacific Group managed the design and distribution of a one-page survey to tenants of Hamilton Landing, including pending tenant, Disney Digital. The survey included a cover letter and informational brochure about SMART. Ann Weatherford of Barker Pacific Group met with tenant representatives in order to answer any questions about the survey.
- Of the approximately 1,200 surveys that were distributed, a total of 201 completed surveys were returned to Q & A Research, Inc. (a national marketing research firm headquartered in Novato, CA) on March 7, 2008 where they were data entered and processed.

**Research Caveat**

- Statistical differences in this report are shown at a 90% confidence level.

Comment Set C19, cont.  
Robert & Nannette Brown

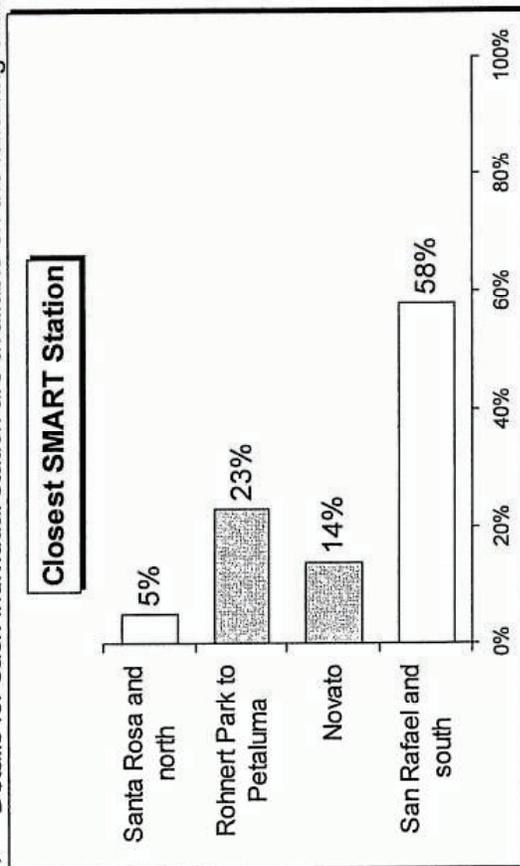
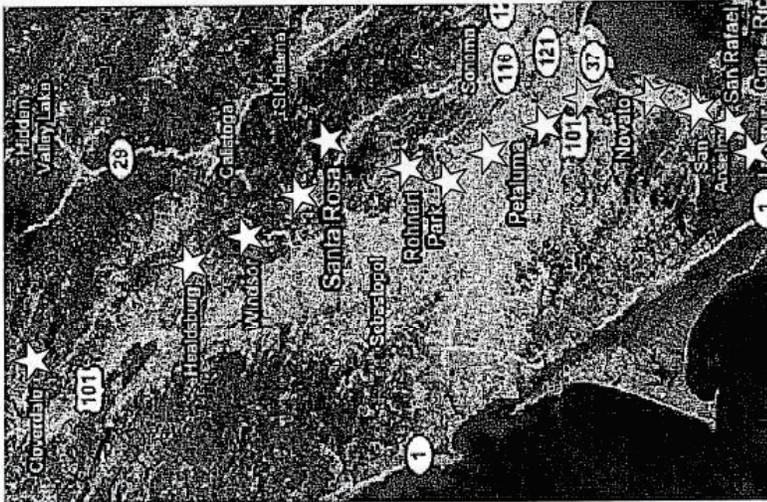
The image shows the front cover of a report. At the top left is the SMART logo, which consists of the word 'SMART' in a large, bold, sans-serif font, with 'SONOMA-MARIN' above it and 'AREA RAIL TRANSIT' below it, all enclosed in a rectangular border with horizontal lines. To the right of the logo, the text 'Hamilton Landing SMART Survey' is written in a smaller, sans-serif font. The central part of the cover features a black and white photograph of a car, with the words 'Detailed Findings' overlaid in a large, white, serif font. At the bottom of the cover, the text 'Prepared by: Q&A research' is displayed, with 'Q&A' in a large, bold, serif font and 'research' in a smaller, sans-serif font. To the right of this text is a small graphic of several circles of varying sizes. Further to the right, the address '64 Digital Drive \* Novato, CA 94949 \* 415.883.1188 \* www.QAR.com' is printed in a small, sans-serif font.

Comment Set C19, cont.  
 Robert & Nannette Brown



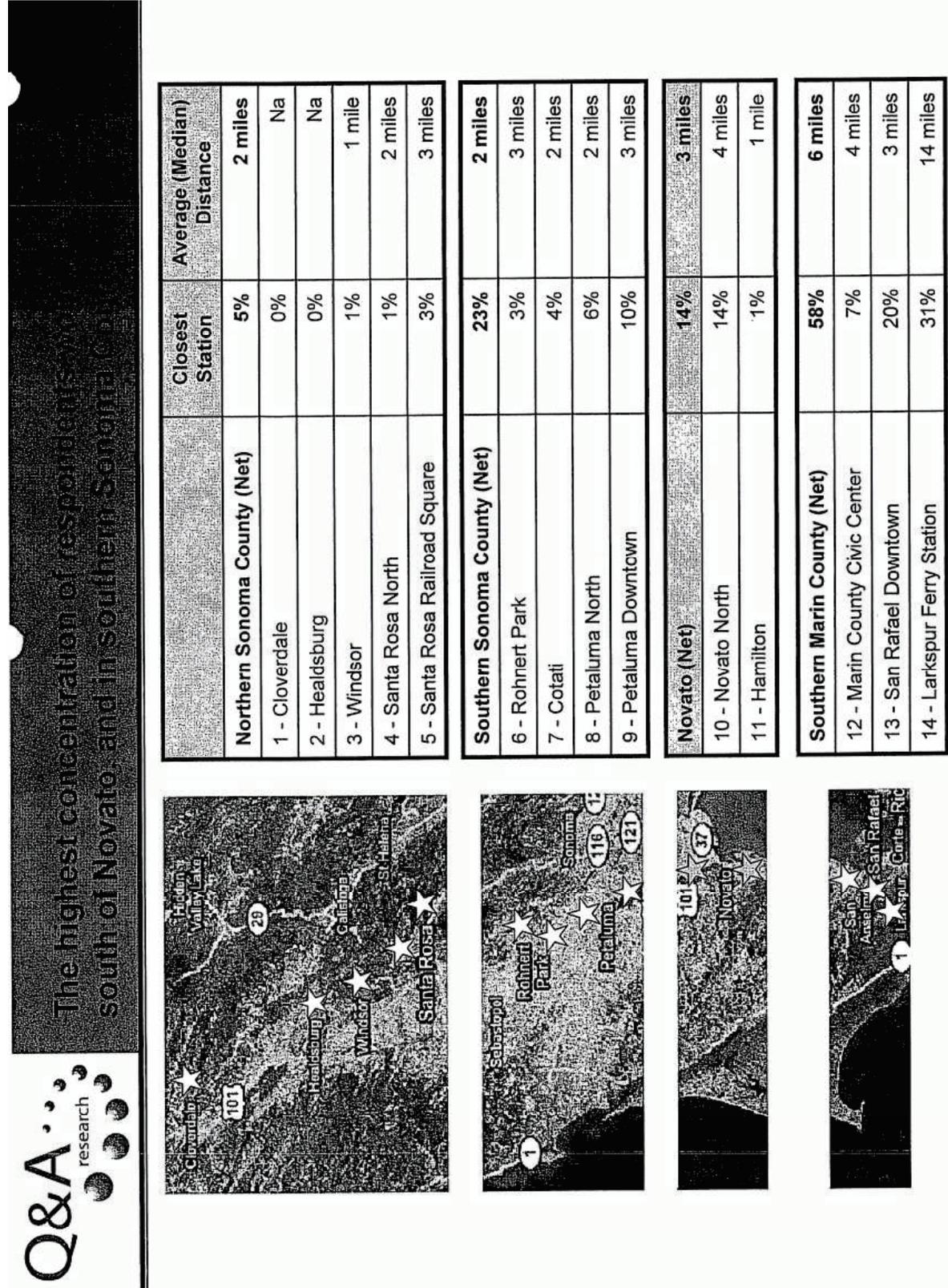
On average, respondents would live 4 miles from the closest SMART station

- Respondents were given a list of proposed SMART stations and were asked how far they lived from the closest station to their home.
  - Almost six in ten respondents (58%) would live closest to a station in Southern Marin County (San Rafael or south). The next most populated area was Southern Sonoma County (Rohnert Park to Petaluma), with almost one-quarter of respondents (23%) residing near the proposed stations. The fewest respondents would live near the stations in Novato (14%) or Northern Sonoma County (Santa Rosa or north) (5%).
  - On average (median), respondents would live approximately 4 miles away from the nearest station to their home. The average distance was less for those who live in Rohnert Park or north (2 miles), but more for those who live in San Rafael or south (6 miles).
  - Details for each individual station are available on the following slide.



A. Which SMART commuter rail station will be closest to your home? (N=183)  
 B. How far will you live from the SMART station that will be closest to your home? (N=190)  
 Base: Total answering. 5

Comment Set C19, cont.  
 Robert & Nannette Brown

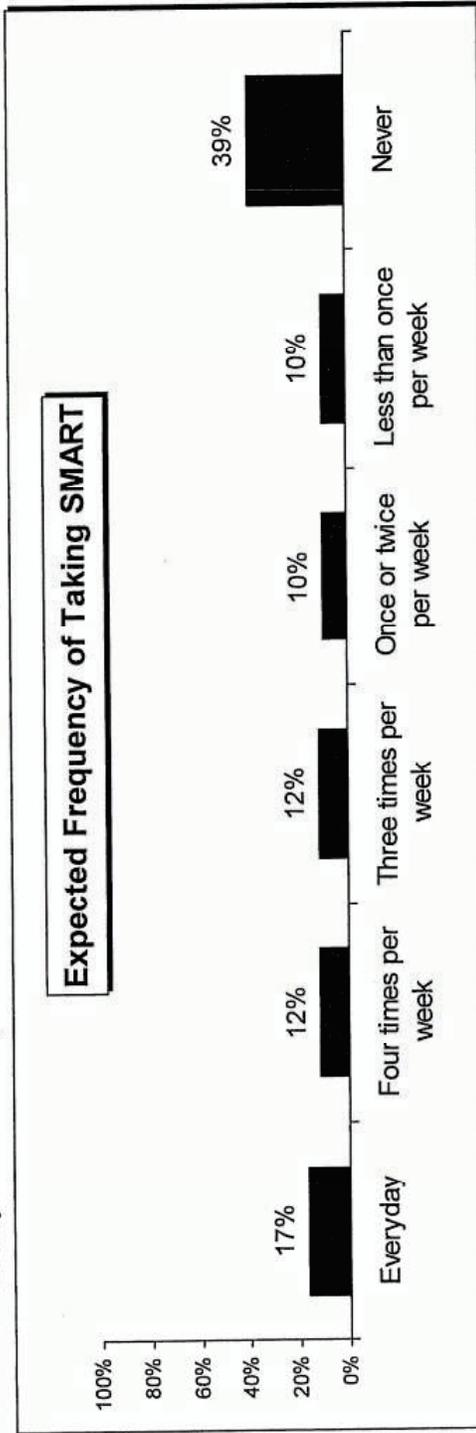


Comment Set C19, cont.  
 Robert & Nannette Brown



The majority of respondents would take SMART at least occasionally if not more frequently.

- Respondents were asked how often they would take SMART to work if a shuttle bus connected Hamilton Landing with the Hamilton SMART station.
  - Half of all respondents (52%) indicated that they would take SMART to work once per week or more often.
  - More specifically, one in six (17%) would take it everyday and one-quarter (24%) would take it three to four times per week.
  - Four in ten respondents (39%) reported that they would not take SMART to work.
    - ▶ On average (median), those who live in Sonoma County would take SMART more often than those who live in Marin County (3.6 times per week for Northern Sonoma County and 3.5 times per week for Southern Sonoma County vs. 0.9 times per week for Novato and 1.5 times per week for Southern Marin County).



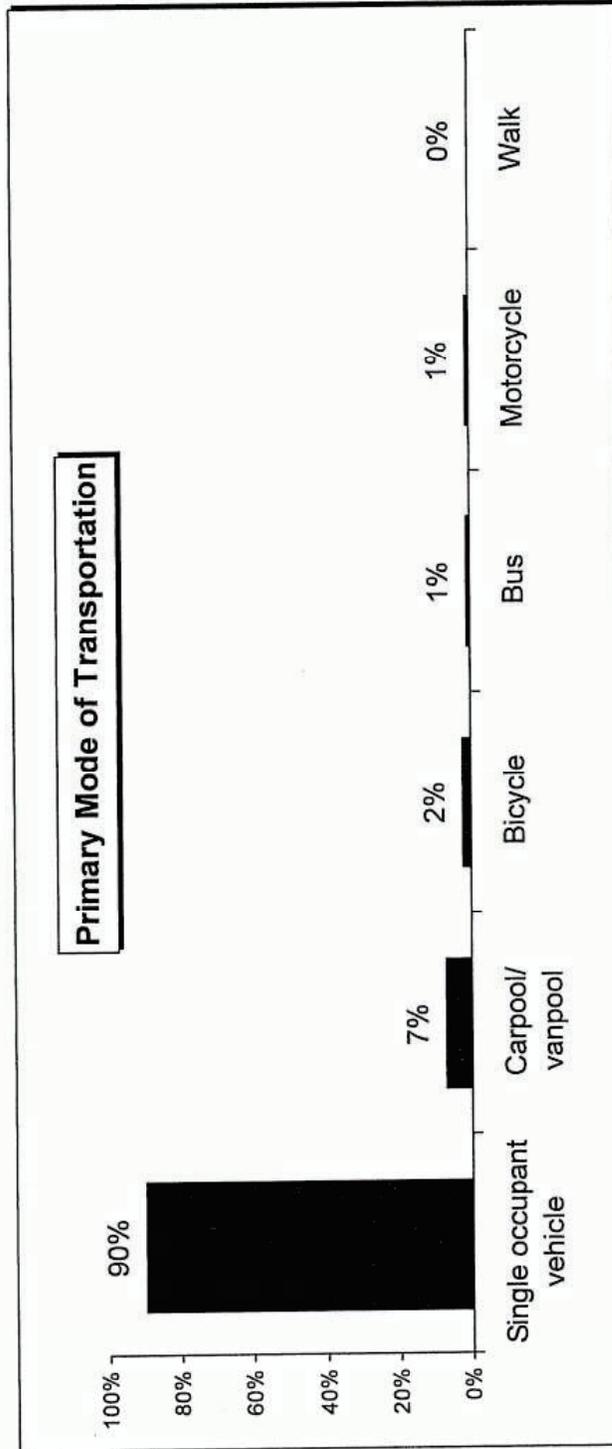
- Later in the survey, respondents were asked how sure they were about their answer to this question.
  - More than eight in ten (83%) reported that they were sure or very sure of their answer.
    - ▶ Those who were on either extreme (everyday or never) were more likely than those in the middle to be sure of their answer.

C. If a shuttle bus connected Hamilton Landing with the Hamilton SMART station (six tenths of a mile apart), how often would you take SMART to work? (N=196)  
 H. How sure are you of your answer to question C, above? (N=197)

Comment Set C19, cont.  
 Robert & Nannette Brown



- Respondents were asked how they currently get to work.
  - The vast majority (90%) drive a single occupant vehicle to work each day.
  - 7% carpool to work.
  - Only 1% commute to work by public bus.

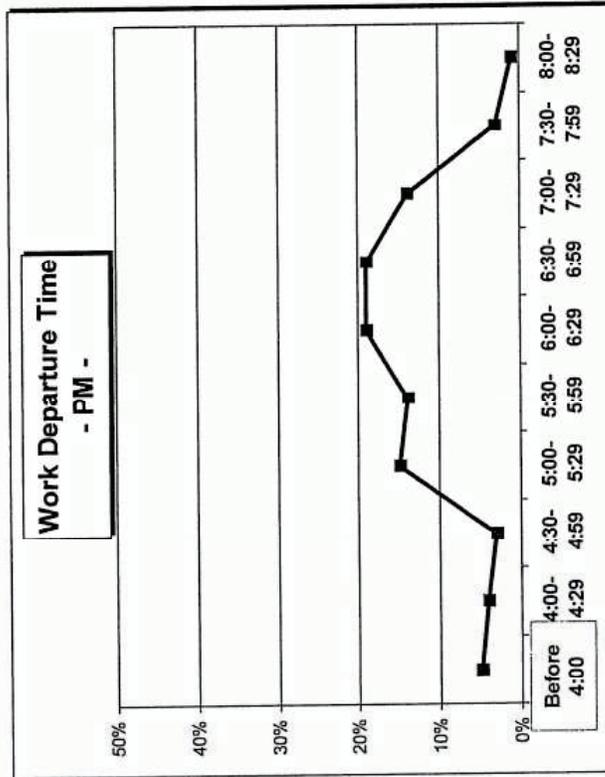
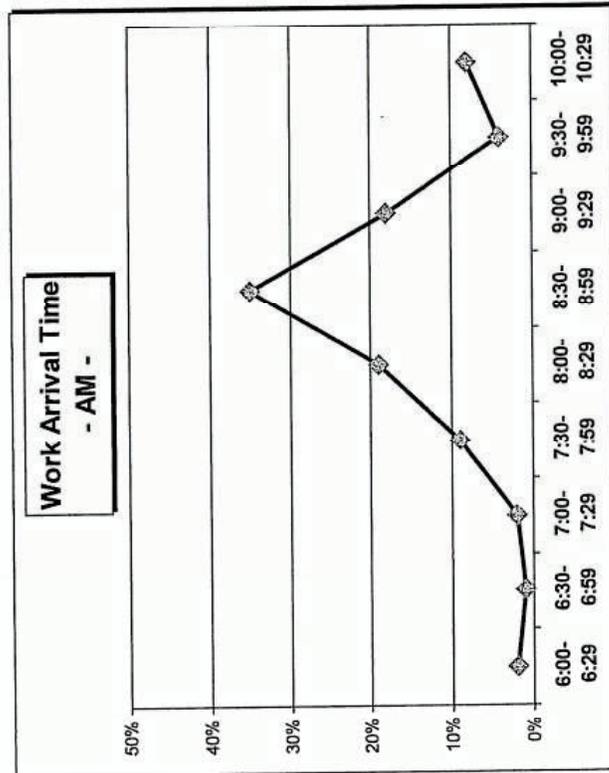


D. How do you get to work now?  
 Base: Total answering. (N=199)

Comment Set C19, cont.  
 Robert & Nannette Brown



- Respondents were asked what time of day they generally arrive at work.
  - The majority (72%) of arrivals occur between 8:00 and 9:30am, peaking between 8:30 and 8:59 AM.
- Respondents were then asked what time of day they typically leave work.
  - Departure times were less concentrated than arrival times; however, the majority of respondents (82%) left work between 5:00 PM and 7:29 PM.

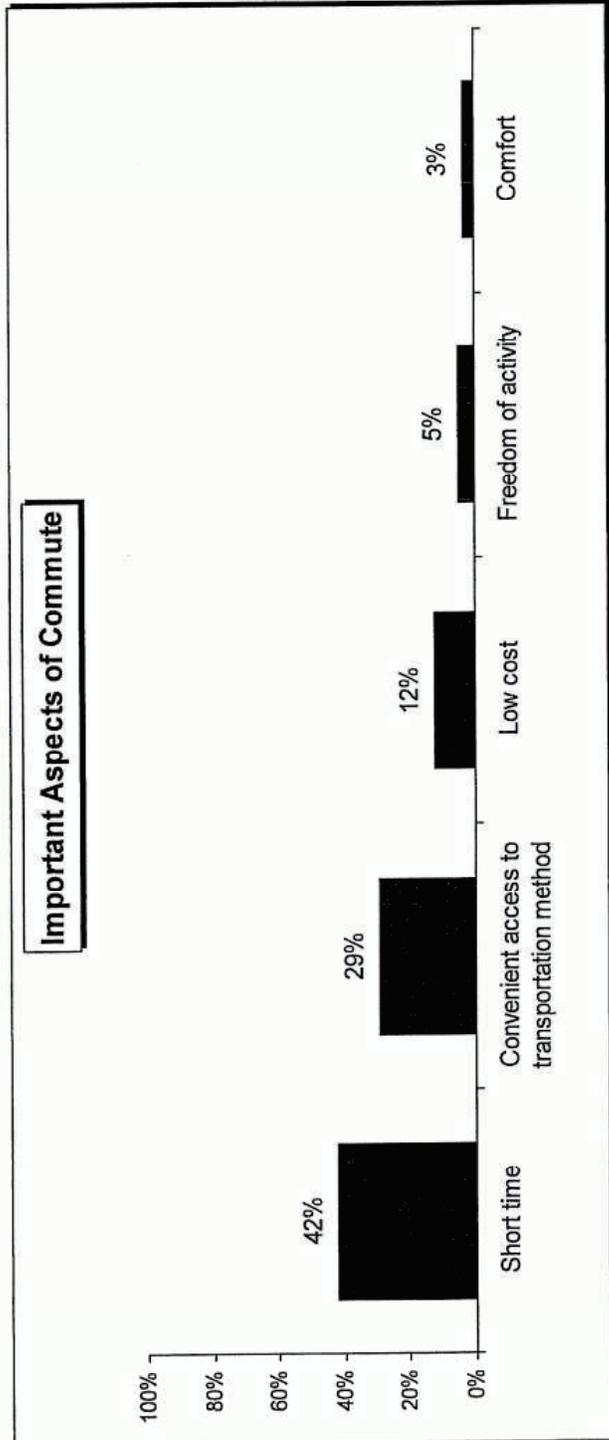


E. At what time of day do you arrive for work in Hamilton? (N=201)  
 F. At what time of day do you leave your work in Hamilton? (N=201)

Comment Set C19, cont.  
 Robert & Nannette Brown



- Respondents were asked the most important aspect of their work commute.
  - Four in ten (42%) indicated that a short travel time is the most important aspect of their commute.
    - ▶ Short travel time was rated as most important by those who indicated they would not take SMART (61%) more frequently than those who would (30%).
  - Approximately three in ten (29%) mentioned that having convenient access to their transportation method was most important, while 12% mentioned low cost.
  - No differences emerged among respondents who live near different station locations.

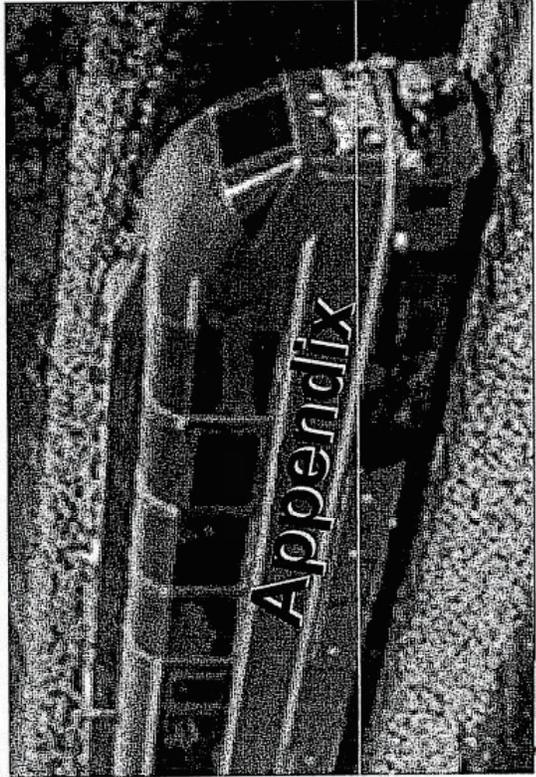


G. What is most important to you in your work commute?  
 Base: Total answering. (N=192)

Comment Set C19, cont.  
Robert & Nannette Brown



Hamilton Landing SMART Survey



Prepared by:



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Comment Set C19, cont.  
Robert & Nannette Brown



Appendix Questionnaire

Your Name (First and Last): \_\_\_\_\_  
 Your Place of Work in Hamilton Landing: \_\_\_\_\_

- A. Which SMART commuter rail station will be closest to your home? Station # \_\_\_\_\_  
 (See the list of stations on the reverse side of this sheet. The Hamilton Station is #11.)
- B. How far will you live from the SMART station that will be closest to your home? \_\_\_\_\_ miles  
 (See the list of stations on reverse side of this sheet. The Hamilton Station is #11.)

C. If a hubbub connected Hamilton Landing with the Hamilton SMART station (six tenths of a mile apart), how often would you take SMART to work? (Please select ONE by marking with a "X")

1. Never
2. Less than once per week
3. Once or twice per week
4. Three times per week
5. Four times per week
6. Every day

D. How do you get to work now? (Please select the ONE method that you use most often.)

1. Single occupant vehicle
2. Motorcycle
3. Carpool/vanpool
4. Bus
5. Bicycle
6. Walk

E. At what time of day do you arrive for work in Hamilton? Time: \_\_\_\_\_ AM

F. At what time of day do you leave your work in Hamilton? Time: \_\_\_\_\_ PM

G. What is most important to you in your work commutes? (Select one)

1. Low cost
2. Short time
3. Convenient access to transportation method
4. Comfort of transportation method
5. Freedom of activity during travel (to read or write, use phone or computer, etc.)
6. Other (Please explain): \_\_\_\_\_

H. How sure are you of your answers to question G, above?

1. Very unsure
2. Unsure
3. Sure
4. Very sure

**Proposed Fare and Travel Times To/From Hamilton for Sonoma Marin Area Rail Transit**  
 Note: The rail station location designated in the Hamilton Master Plan is just north of the bridge on Main Gate Road.

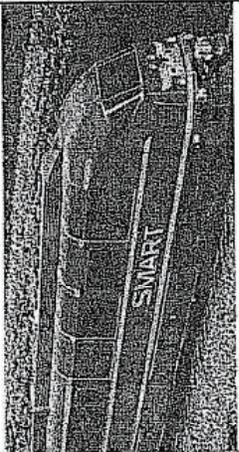
Station Connecting With the Hamilton SMART Station (#11) (Driving distance from bridge on Main Gate Rd. noted in parentheses)	Approximate Travel Time (minutes)	Approximate One-Way Fare*
#14   Larkspur Ferry Station (10 miles) Sir Francis Drake Boulevard at Larkspur Landing Circle	19	\$2.30
#13   San Rafael Downtown (7 miles) Hamilton between Third and Fourth Streets	10	\$2.48
#12   Marin Center (6 miles) Marin Center Drive and Melrose Parkway	6	\$2.24
#10   Novato North (6 miles) Anderson Drive and Redwood Boulevard (near Firman's Funf)	7	\$2.00
#9   Petaluma Downtown (14 miles) Lakeside Highway (between D St. and East Washington St.)	18	\$2.90
#8   Petaluma North (18 miles) Corcoran Road near North McDowell Boulevard	25	\$2.94
#7   Cotuit (24 miles) Coital Avenue and Industrial Road	29	\$3.63
#6   Rolland Park (26 miles) North of Golf Course Drive at Roberts Lake Road	33	\$3.87
#5   Sausalito - Redwood Springs (26 miles) Highway 101	39	\$4.32
#4   Sausalito North (33 miles) Jennings Avenue at Harbor Street	43	\$4.55
#3   Windsor (42 miles) Windsor Road at Windsor River Road	50	\$5.15
#2   Healdsburg (47 miles) Harmon Street (Historic District)	57	\$5.59
#1   Cloverdale (60 miles) Asst Road just south of Citrus Fair Drive	73	\$7.00

Comment Set C19, cont.  
 Robert & Nannette Brown



Appendix: Brochure (continued)

Learn about the benefits and possibilities of the SMART RAIL TRANSIT PROGRAM.

**SMART: THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

As a public agency, the Sonoma-Marin Area Rail Transit (SMART) District is responsible for making sure the public is well informed about its work in re-establishing passenger rail service and building a north-south bicycle/pedestrian path for Marin and Sonoma counties.

The District is distributing this brochure to update us on recent developments and provide general information about the SMART rail project.

First Sonoma facilities on the main elements of the final environmental impact report (EIR) that the SMART Board of Directors formally certified on July 19, 2005. For actions taken more than three years of comprehensive environmental review of the SMART train and bicycle/pedestrian pathway project. Their review included extensive public input, including seven working meetings, two public hearings on the Draft EIR and a final public hearing on the Final EIR.

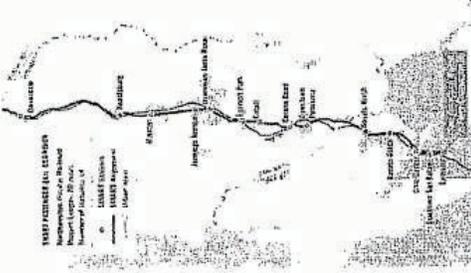
To access the EIR and all the supporting documents, we encourage you to visit the SMART District website at [www.smartdistrict.org](http://www.smartdistrict.org). Among some of the most recent additions to the EIR that you may want look at and which are listed on the public review process are:

- Responses to public comments on the EIR (over 1,500 separate written comments)
- A summary of the most frequently asked questions contained in Master Responses
- Revisions to the EIR in project and underline format
- The Mitigation Monitoring Program

**LET THE TRAIN TAKE YOU THERE**

**SMART: THE ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

THE DRAFT EIR, WHICH INCLUDES REVISIONS, CLARIFICATIONS AND ADDITIONAL INFORMATION, IS AVAILABLE FOR PUBLIC COMMENT. A WORKING GROUP OF THE DISTRICT'S BOARD OF DIRECTORS IS CURRENTLY REVIEWING THE ENVIRONMENTAL SUPERIOR ALTERNATIVE. THE SMART DISTRICT IS COMMITTED TO KEEPING THE PUBLIC INFORMED ABOUT THE ENVIRONMENTAL SUPERIOR ALTERNATIVE. SPECIFIC PUBLIC COMMENTS ABOUT THE PROJECT MAY BE SUBMITTED TO THE DISTRICT BY VISITING [WWW.SMARTDISTRICT.ORG](http://WWW.SMARTDISTRICT.ORG).




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 (415) 499-3510

Comment Set C19, cont.  
Robert & Nannette Brown



Appendix: Brochure (distributed with questionnaire)

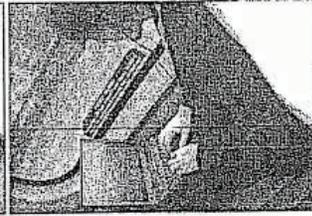
KEY ENVIRONMENTAL IMPACT REPORT ISSUES

Ridership Estimates

Based on the EIR, the estimated number of total daily passengers is up to 5,200 at start up in 2010, or approximately 1.4 million annual passenger trips per year.

Responding to numerous public comments on the EIR related to train ridership estimates, the SMART District conducted several separate "sensitivity" analyses to assess potential changes in ridership based on different circumstances. For example, ridership increases could be as high as 5,800 if gasoline prices were to rise.

In addition to rail ridership, the EIR also included estimates of the "total" transportation pathway including the train station. It is estimated to be approximately 7,000 per day on weekdays and 10,000 per day on weekends.



Express Bus Alternative



Several alternatives were given in the EIR to an alternative to SMART that would involve the creation of new express bus services. The Express Bus Alternative was based on the Marin/Sonoma Express Bus Study prepared by the Marin County Congestion Management Agency in 2002. The EIR projected daily ridership on an express bus service of 2,000, a little over half of the projected ridership on SMART.

A number of public comments on the EIR requested analyzing express bus ridership using different assumptions. These assumptions include:

- Doubling frequency of express bus service on each route.
- Adjusting scheduled speeds based on existing Golden Gate Transit off-peak and weekend lower fares.
- Adding reverse-peak direction service and faster in-peak on-peak.

With these changes, the projected ridership for the Express Bus Alternative was still lower than the train.

It should be noted that the forecasted ridership for the Express Bus Alternative assumes that the Marin/Sonoma Express Bus service would be provided before express bus service could begin. Without widening of the Highway 101/101 Express Bus Alternative, the EIR concludes that, with lower fares, ridership on express buses would likely be lower than bus ridership for SMART. The Transportation Commission recently announced that construction of the Marin/Sonoma Express Bus Alternative is not anticipated to be completed until 2020 at the earliest.

Paving the Right-of-Way

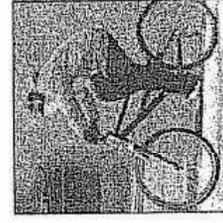
The SMART District received comments asking why the EIR did not examine the possibility of paving the Highway Pacific Rim/THP right-of-way for redevelopment.

The EIR concluded that paving the right-of-way would be financially and operationally infeasible. Further, over the last 20 years of planning, neither Marin County, Sonoma County nor the Golden Gate Bridge, Transportation and Highway District have proposed paving the THP right-of-way for bus service. Such a proposal would be inconsistent with most adopted general plans and with SMART's existing legislation. Finally, a freight statement exists along the corridor north of Healdsburg, which would prohibit using the right-of-way.

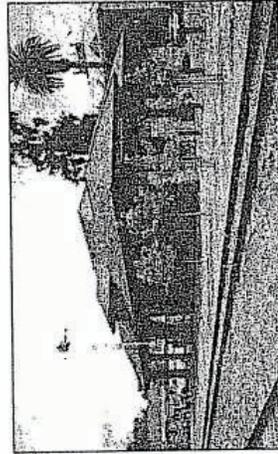
Future Freight Operations

Federal law permits freight service on the adjacent right-of-way north of Healdsburg. However, based on an agreement between SMART and the freight operator, passenger service has priority over freight service. SMART also would consider disposal of both passenger and freight trains, enabling it to avoid any scheduling conflicts.

The EIR analyzes the cumulative impact of future freight service along the SMART right-of-way. Staggering freight loads would create a maximum of three to six trainloads per week and not more than one trainload per day. The EIR concluded that the cumulative impacts of freight service would be insignificant or negligible.



AND FINDINGS



Larkspur Station

SMART wanted to know if the EIR should consider the possibility of SMART station expansion, a location that the Larkspur City Council suggested or analyzed. The proposed station site on SMART property and area requires an additional right-of-way or construction in Larkspur. Therefore, the EIR concluded that the proposed station site creates no visual impact with new station views to the bay and will not require any reconstruction of the existing Larkspur Larkspur Shopping Center. The SMART District is committed to working with Larkspur and all other municipalities where stations are proposed to ensure the best location and design.

Based on comments on the Draft EIR and new information related to the Caltrans Tunnel Rehabilitation Project, SMART is recommending that the Larkspur station site be relocated further to the north. The new location would allow SMART to retain a pedestrian pathway connection to the ferry terminal that is part of the proposed Caltrans Tunnel Rehabilitation Project being built by the Marin County Public Works Department. Because of this proposed change, SMART would not impact the property owned by the Marin Airport. The change would also allow passengers to walk the sea level four blocks to the ferry terminal by utilizing the existing pedestrian overcrossing of Sir Francis Drake Boulevard.

Air Quality

By carrying approximately 5,200 air trips per day, SMART will require greenhouse gases which contribute to global warming. SMART would be less than significant. SMART is also committed to using low-emission engine technology, as well as the use of bio-diesel blended fuels that can further reduce emissions.

Train Track and Engine Sounds

The EIR confirmed that engine sound track noise from trains would be less than significant. SMART was committed to using quieter, emissions-reducing track to keep down noise levels. In addition, SMART has recommended that where it may be necessary to power that an electric power source be used to power the tracks, over their conventional bus engine.

IMPACTS IDENTIFIED

It is important to note that the EIR includes a very conservative approach in identifying impacts, using a "worst-case" analysis. The SMART District expects that as it completes final engineering design for the project it will be able to significantly reduce any negative impacts, including:

1. Susceptibility of the rail alignment and structures to ground shaking from earthquakes. Marin and Sonoma counties reside within a region that is known historically for significant earthquake activity. SMART must follow all seismic requirements in building and equipping the train. SMART, however, cannot prevent earthquakes, and the potential for earthquakes makes it impossible for SMART to conclude in the EIR that the impact from an earthquake would be less than significant.
2. Traffic conditions near station. Traffic conditions near station accessing the SMART station would generally add a very small amount — less than five seconds delay — to most future intersection operations. Traffic delays near stations will be minimized through the use of signalized timing and appropriate intersection design techniques.
3. Potential noise from train horns at grade crossings. Federal safety regulations require that trains sound their horns at grade crossings. However the requirement can be waived if local communities implement "Quiet Zones." A Quiet Zone requires crossing improvements, requires crossing improvements, and SMART has included in its cost estimates. In a Quiet Zone the community can direct SMART to not use train horns in the morning, evening or at day.

## **Responses to Comment Set C19**

### **Robert and Nannette Brown**

- C19-1 The correction regarding the funding for the Hamilton shuttle is noted. This does not affect the overall impact analysis.
- C19-2 See Master Response 3. The ridership projections are based on the distance from the station, not the Hamilton Shuttle stops.
- C19-3 Approximately 50% of the riders would be from those living in the vicinity, and the other half from those working at jobs near the Hamilton Station.
- C19-4 The sensitivity of overall project ridership to gasoline price increases was addressed in the 2006 FEIR Master Response G.
- C19-5 The survey provides interesting information on where potential riders might live and the time that they would travel. However, transportation planners generally believe this methodology does not give very accurate ridership projections, and so the profession largely abandoned it several decades ago. There is a refined methodology called “stated preference” but it requires the respondent to explicitly be given more information on trade-offs. It is unclear whether the non-respondents to the survey would use the proposed service, or did not respond because they were not interested in it.
- C19-6 The existing Hamilton shuttle and its current service level was considered.
- C19-7 Based on the forecast, approximately 35 vehicle trips during the peak hour would be from outside the Hamilton area. These trips would be in the direction opposite to the major traffic flow in Hamilton (which is out in the morning and inbound in the afternoon, whereas station traffic would be exactly the reverse). Assuming the shuttle runs every half-hour to meet peak direction trains, its potential (with every seat full) would be an elimination of perhaps 25-30 peak vehicle trips, taking into account the former mode of ridership of the users.
- C19-8 See response A1-17. As noted in the 2006 FEIR (p. 3.3-593), where land uses are comparable and at a similar distance from Highway 101, a single measurement may be representative of the general acoustical environment for several miles of the corridor.

**Comment Set C20**

**Jerry Stiles, Daniel Lamberson, Shawn Hoover, Pamela Pizzimenti, Patricia Brajkovich, Zane R. Carpenter, Gigi Carpenter, Kerry Badgsten, Stephen Badgsten, Cindy Fildes, Craig Fildes, and Craig Scott**

April 21, 2008

Sonoma-Marín Area Rail Transit  
Attn: Lillian Hames  
750 Lindaro St. #200  
San Rafael, CA 94901

Subject: Comments on the Sonoma-Marín Area Rail Transit Passenger Rail  
Project Supplemental Draft Environmental Impact Report (SEIR)

Dear Ms. Hames:

This letter addresses the concerns of the undersigned property owners with the proposed use of the SMART line for passenger and freight service as described in the subject Draft SEIR. These property owners are generally described as a portion of those with residential properties in the Town of Windsor located adjacent to the SMART railway right of way. The following are the collective comments from these property owners:

With proposed passenger and freight train service, our residences would experience significant impacts of noise and vibration and we are concerned that inadequate or no mitigation measures have been provided in the DEIR for either noise or vibration created by these trains. In particular, Table ES-1 of the DSEIR states the "increased cumulative noise levels" are "Significant Unavoidable" when there appears to be a number of mitigation measures available.

C20-1

We are requesting that mitigation measures be implemented to reduce the cumulative noise and/or vibration impacts of the passenger rail and the increased number of freight train trips being considered (identified as "speculative"). A number of mitigation measures are available and include sound walls, limiting train speed to 25 miles per hour through the Town limits, limiting freight service to daytime hours, and keeping within the number of daily freight train trips proposed in the 2006 EIR. Additionally, although the SEIR states that "the significantly greater length, weight and axle loads of freight trains would generate vibration levels that could potentially exceed the FTA impact criteria within 100 feet of the tracks," the cumulative impact of the passenger and freight trains on vibration is not evaluated in the SEIR nor are mitigation measures provided.

C20-2

We appreciate this opportunity to review and comment on the Draft SEIR and look forward to having our comments addressed. For specific questions or comments on this letter, please contact Craig Scott:

Sincerely,

See signatory pages that follow.

Comment Set C20, cont.

Jerry Stiles, Daniel Lamberson, Shawn Hoover, Pamela Pizzimenti, Patricia Brajkovich, Zane R. Carpenter, Gigi Carpenter, Kerry Badgsten, Stephen Badgsten, Cindy Fildes, Craig Fildes, and Craig Scott

SMART SEIR Comment/Windsor Residents  
 Page 2

Signatories to this letter:

Property Address	Owner Phone	Owner Printed Name/ Signature
		Jerry Stiles
		Daniel Lamberson
		Daniel Lamberson
		SHAWN HOOVER
		Shawn Hoover
		Pamela Pizzimenti
		Patricia Brajkovich
		Patricia Brajkovich
		Zane R. Carpenter
		Zane R. Carpenter
		Gigi Carpenter
		Gigi Carpenter
		Kerry Badgsten
		STEPHEN BADGSTEN
		Stephen Badgsten
		Cindy Fildes
		Cindy Fildes
		Craig Fildes
		Craig Fildes



## **Responses to Comment Set C20**

**Jerry Stiles, Daniel Lamberson, Shawn Hoover, Pamela Pizzimenti, Patricia Brajkovich, Zane R. Carpenter, Gigi Carpenter, Kerry Badgsten, Stephen Badgsten, Cindy Fildes, Craig Fildes, and Craig Scott**

- C20-1      See response A1-12. As explained in Sections C.6.4 and C.6.4.1 of the DSEIR, SMART passenger rail service would not cause significant train pass-by noise or vibration impacts. Because the passenger service would not individually result in a significant impact, cumulative noise impacts driven primarily by the freight service would not be within the jurisdiction of SMART to mitigate. However, SMART has committed to assisting in the implementation of Quiet Zones, which would mitigate impacts of train horn noise from both freight and passenger rail service. See Master Response 5. NCRA would be responsible for implementing all feasible mitigation measures to mitigate the impacts associated with freight rail service. It is important to note that NCRA is in the process of preparing its own EIR to evaluate the environmental impacts of freight service, including its contribution to a cumulative noise impact. Part of that effort would be to identify feasible mitigation measures that could be implemented by NCRA.
- C20-2      See response B3-11.

## Comment Set C21 Robert Tanner

From: robert tanner [<mailto:robertbtanner@worldnet.att.net>]  
Sent: Sunday, April 20, 2008 5:29 PM  
To: Kathy Cochran  
Subject: Comment on SEIR, 4-16-08

Dear Ms. Cochran:

After attending the SEIR meeting on April 16, 2008, I decided to share insights about additional train and bus operations that would help the SMART train be more successful.

These proposals are designed to encourage SMART to work towards being a replacement service for the existing Golden Gate Transit Route 80 in Sonoma County, increasing ridership on the train.

This thought process was started by SMART's exploration of the use of light-weight Diesel Multiple Units, (DMUs), based on the units the NCTD operation in North San Diego County is now running between Oceanside and Escondido. I wondered, if NCTD could operate an all-day 30 minute service on their 22 mile line with light-weight DMUs, could SMART do the same, operating an all-day service, seven days a week, on an hourly frequency over a 40 mile route between Jennings Avenue station in Santa Rosa and downtown San Rafael station?

To do this would require the continuing operation of THREE sets of light DMUs over a 55 minute run time, each set of light DMU working six or seven trips for a total service of 19 or 20 trips a day, both weekdays and weekend/holidays. This extra service would be limited to a portion of the route between Jennings Avenue station in Santa Rosa and the Downtown San Rafael station. This would allow the SMART to fully replace the GGT route 80 bus service in Sonoma and north Marin between Santa Rosa and San Rafael with train service. The remainder of the rail route between Jennings Avenue and Cloverdale would be serviced as SMART is proposing.

Beyond the San Rafael Station, SMART should seriously look into operating dedicated feeder buses to take patrons on into San Francisco and the Caltrain station and also over to the Richmond station to connect to the San Joaquin and Capitol Corridor trains as well as BART. Based on my analysis, five buses would have to be operated over two routes to provide this. The buses could be contracted from GGT or another operator.

This idea is based on Amtrak's San Joaquin Route and its successful coordinated train-bus operation at Bakersfield that takes patrons on to Southern California by dedicated buses.

C21-1

C21-2

**Comment Set C21, cont.**  
**Robert Tanner**

The two feeder routes would be as follows:

RTE 101: Would operate non-stop to the Golden Gate Bridge toll plaza, then operate over GGT's Financial District route to Downtown San Francisco and terminate at the Caltrain Station. One-way run time is an hour and fifteen minutes minimum. THREE buses minimum would be needed to operate on an hourly basis. Service replaces remainder of GGT Route 80.

(GGT continues operating their Route 70 bus, expanded to half-hourly frequency, providing connecting service to Marin City and SF Civic Center area.)

RTE 102: Would operate non-stop over the San Rafael Bridge to the Richmond BART/Amtrak Station. One-way run time is thirty minutes. TWO buses needed to service this route on an hourly basis reliably. Service replaces part of GGT Route 42. (GGT continues to operate their Route 40 bus all day, providing faster direct service to El Cerrito Del Norte BART.)

Although the intent of SMART was to connect to the Larkspur Ferry, the Larkspur rail terminal is quite a ways from the ferry terminal, either requiring a long walk or fussing with shuttles to span the gap. Also the Larkspur Ferry doesn't run that often on weekends. This issue caused me to doubt the ability of SMART to attract enough patronage to justify its high building costs.

Connectivity issues are high on my list of concerns as Sonoma County has the worst access to the remainder of the Bay Area, both by car and public transit. SMART needs to address this by providing the direct dedicated bus shuttles to both Caltrain and the Capitol Corridor as I'm proposing.

I am a volunteer Transportation Analyst with 31 years experience of watching transit operations both succeed and fail. My recommendations to transit enabled me to serve on a transit TAC in Southern California. I am presently proposing changes to Sonoma County Transit's Route 20 in an effort to make that route more effective as a feeder to SMART.

I hope that I've encouraged SMART to see the vision of its true potential and I appreciate your extending me this opportunity to comment.

Thank you very much for your time and consideration.  
Sincerely,  
Robert B. Tanner

C21-2 cont.

**Responses to Comment Set C21**  
**Robert Tanner**

- C21-1      Additional passenger rail service is not being contemplated at this time.
- C21-2      The comment suggests that SMART operate feeder buses to several locations. This is a comment on the overall project and not related to the issues analyzed in the DSEIR. It should be noted that SMART is a rail transit district and is not proposing bus service. However, SMART will continue to work with local and regional bus agencies to coordinate and improve connectivity.

## Comment Set C22 Jack C. Swearingen, Ph.D

SMART Supplemental EIR: Comments by J.C. Swearingen

April 20, 2008

### Comment 1: Light DMUs and emergent rail car technologies

It is premature to limit discussion to an either-or choice between “heavy” DMUs—such as the Colorado Rail Car—and “Light” DMUs such as the Siemens Desiro. Several technological advances may be commercially ready by the time the “start-up” rolling stock is ready for first overhaul or replacement, or possibly even by the time SMART management is ready to issue its first RFQ for rolling stock. Four different hybrid rail vehicles are undergoing developmental testing as of this moment. FRA compliance is not certain for any of them; but neither is it certain for light DMUs.

C22-1

- a. JR East diesel-electric hybrid. <http://www.japanfs.org/db/1881-e>. Last visited 11/07/2007.

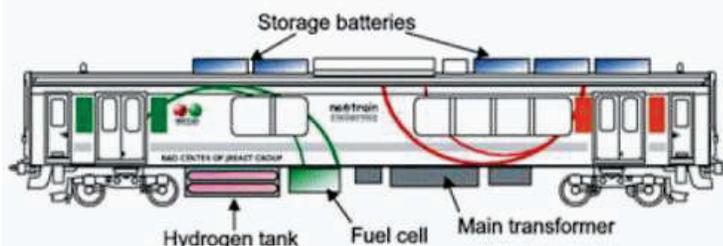


In conjunction with Hitachi Ltd., East Japan Railways (JR East) began developing hybrid railcars with a diesel-electric-battery power system in May 2003. The batteries are charged during regenerative braking and can provide extra power during acceleration—thereby permitting a smaller diesel engine. Three railcars were produced in order to measure the railcar performance and energy conservation effects. Testing in transit service began on the Koumi Line between Kobuchizawa and Komoro in the summer of 2007. The JR East web site suggests that fuel cells could be substituted for the diesel engine if and when they become available and cost-competitive.

- b. United Kingdom <http://www.eurekamagazine.co.uk/article/9037/Hybrid-trains-to-be-offered-to-UK.aspx?u=35241>. Last visited 4/19/2007.

The Hitachi hybrid rail car pictured above is being considered for use in the UK. The rail car has a 331kW engine coupled to a 180kW generator and 16 kWh lithium ion batteries on the roof.

- c. Hydrogen fuel cell train. <http://www.jreast.co.jp/e/press/20060401/index.html>. Last visited 4/19/2007.



JR East has developed a fuel cell system for railcars, and announced the first test run of the World's First Fuel Cell Hybrid Railcar on October 19th, 2006. The control system for the hybrid railcar is based on a diesel hybrid system, but replaces the diesel engine with a fuel cell that uses hydrogen as fuel. This efficient system supplies the necessary electric power from both the fuel cell and the storage battery when accelerating, and the storage battery is recharged by electric power produced by the regenerative brakes when braking. With two

65-kilowatt fuel cells and six hydrogen tanks under the floor and a battery on the roof, it is capable of 100km/h (60mph) with a range of between 50 and 100 km (30 and 60 miles) without needing to be refilled. Research is

Comment Set C22, cont.  
Jack C. Swearingen, Ph.D

underway into the use of regenerative braking to recharge the train's batteries with the energy used to stop the train which will increase range further. The train was introduced into scheduled local service in summer 2007.

C22-1 cont.

d. France <http://www.ecogeek.org/content/view/1045/>. Last visited 10/17/2007.



A hybrid electric train built by Bombardier just took its inaugural trip in France. Diesel-electric locomotives have always been hybrids—with diesel motor-generators engines powering traction motors. But this new train includes batteries that can be charged from any available electric power source (not just the motor-generator). When the batteries are charged from the grid, the engine will produce roughly 20% less CO<sub>2</sub>

than non-hybrid versions. Already, France has ordered 144 of the hybrid locomotives for placement throughout its rail system. Admittedly, here in America, we'd be happy to see any mass transit at all, let alone extra-efficient transit. But we can still be happy for the French and their new spiffy engines.

e. "Green Goat" hybrid freight locomotive [http://www.railpower.com/products\\_hl.html](http://www.railpower.com/products_hl.html). Last visited 06/28/2007.



A Green Goat hybrid shunting locomotive.

In 2004, [RailPower Technologies](http://www.railpower.com) had been running pilots in the US with the so called Green Goats—resulting in purchase orders by the [Union Pacific](http://www.unionpacific.com) and [Canadian Pacific](http://www.canadapacific.com) Railways starting early 2005. The [diesel-electric](http://www.railpower.com) hybrid trains are expected to cut emissions by up to 90-percent and decrease fuel consumption by up to 60-percent as compared to conventional diesel-powered locomotives. The Green Goats will be used in rail yards for marshalling trains.

Comment 2: Weekend Travel

C22-2

My wife and I retired to Santa Rosa in 2002. Our children and three school-age grandchildren live in an apartment in San Francisco. We all enjoy regular get-togethers, in Santa Rosa, at the "kids" apartment, and often for hikes or bicycle rides in Marin County. Sometimes we take the Ferry from Larkspur as an extra treat. The outings are often followed by visits to a coffee bar, or sometimes dinner out. Accordingly, we have considerable experience with Highway 101—on weekdays, weekends, and holidays. We have learned to select travel times that reduce the probability of traffic congestion, but it is always uncertain. In fact, I question the SEIR assertion that traffic on the highway is less on weekends.

When SMART begins service our family will use it to enlarge the scope of our outings. We will take excursions to the north and the south—day-trips or overnights, with and without bicycles. We will visit our progeny in the City and they will relish coming by ferry and train to visit us. Sometimes we travel to San Francisco on weekdays to meet friends from our former community of Livermore-Pleasanton. They travel by BART, but we have to drive. We go to Golden Gate Park, art exhibits, restaurants, and Giants games. With SMART, they would be more likely to come to Sonoma County for visits.

I suggest that the foregoing example is representative of a large community—and one that has not yet been recognized as a base of ridership for SMART. There are many, many retired persons like us in Sonoma County. We will be frequent users of SMART.

## **Responses to Comment Set C22**

### **Jack C. Swearingen, Ph.D.**

C22-1 Comment noted. SMART may consider other available DMUs powered by alternative means, such as hybrid power or fuel cell power, as part of its vehicle procurement process. See also response B1-2.

C22-2 In certain areas and times on Highway 101, there is probably more traffic on weekends than weekdays. The DSEIR discusses and notes the presence of considerable existing weekend highway congestion on Highway 101 on pages C.3-1 through C.3-3. It was noted in the DSEIR that there was no congestion data through central San Rafael, due to construction. Even though the gap closure project will improve this situation in the near-term, in the long-term (20 to 25 years from now) traffic congestion over Puerto Suello hill is likely to return due to growth in traffic. We agree that one of the reasons for having weekend service is to better meet the travel needs of an increasingly large retired population, in both Marin and Sonoma counties. In Marin County, for example, ABAG predicts that the population of the 65+ age group will increase by 167% from 2005 to 2035, from 14% of the population to 34% of the population.

SMART plans to work with the yet-to-be selected railcar manufacturer to accommodate bicycles on trains. See response B1-3 for an example of how this is currently done on Sprinter trains.

Comment Set C23  
Kalvin Platt



April 21, 2008

To: kcochran@sonomamarintrain.org  
NovatoCouncil@ci.novato.ca.us  
ToddFields@sbcglobal.net

Subject: Comment on Draft SEIR, Sonoma-Marín Rail Transit

I was asked in January 2008 by several residents of the Hamilton Community in Novato to express my opinion about the proposed SMART commuter rail station at Hamilton. The residents, Marla Fields and David Brewer met with me where we went over several documents on the Hamilton Area, discussed the issues about the station and toured the proposed location and the community surrounds. I now have had the opportunity to also review the draft SEIR by Sonoma-Marín Area Rail Transit.

They had contacted me based upon a December 2007 article in the Marin Independent Journal that highlighted my work over many years as an architect and planner "promoting such things as protecting eco-systems and building live-work communities near transportation hubs." I have worked extensively on community transportation and planning for over 40 years, starting with improving access to BART Stations and creating pedestrian trails along BART rights of way in the Cities of Albany and El Cerrito, providing zoning incentives for developments that provide access to and located near BART stations in Downtown San Francisco, and planning and designing a mixed use center around the Downtown Oakland Station. In recent years we have done plans that relate land uses to rail stations in places like the University of Miami, Florida Campus relation to a new Metrorail Station, and Veritas Software Corporate Campus relationship to a light rail station in Mountain View, California. Most recently I was the Chairman of a Panel on Transit Oriented

## Comment Set C23, cont. Kalvin Platt



Development (TOD) sponsored by the Urban Land Institute (ULI) for the City of Richmond in October 2007.

I stated in January that, in my opinion, the proposed location of a SMART commuter rail station at Hamilton is in every way a fine example of green or sustainable planning and would have many positive outcomes for the Hamilton Community, the City of Novato and Northern Marin. It has all the elements of good transportation and land use planning:

1. The station has been carefully Master Planned over a period of years in a good, central location.
2. It is located along the proposed rail right of way where it does not intrude into any neighborhoods.
3. It has good access to local roads, bicycle and pedestrian circulation systems.
4. A substantial population lives within 2000 feet of the station. This is a standard used by many Transit Oriented Developments and is an easy walking distance.
5. There is an existing shuttle system at Hamilton that can feed to the station from the surrounding community.
6. Hamilton has a diverse population within easy walking or shuttle distance – including families with children, affordable housing, and seniors, all high users of transit.
7. Hamilton has a significant commute to work population; a significant job center, and a major Coast Guard Facility all within walking or shuttle distance, representing both origins and destinations for daily trips.

The Draft Supplemental EIR brings further substance and analysis to the statements above. First it finds that of the alternate sites in Southern Novato, the Hamilton station site "...would generate the highest ridership for the SMART train... given the density of surrounding land uses and accessibility... and would therefore have the greatest impact of reducing VMT and congestion on Highway 101."

C23-1

Comment Set C23, cont.  
Kalvin Platt



After reviewing the SEIR, I believe the Hamilton Station by "generating the highest ridership" addresses the most critical concern in making SMART an overall successful system that would have long term regional and local benefits. Increasing ridership and reducing VMT on Highway 101 are both to the financial and environmental success of this venture.

The proposed station would open new opportunities for Hamilton residents, visitors, workers, and employees of the Coast Guard to have increased transportation options while reducing local automobile trips within Hamilton. This is a good definition of green planning and would put Hamilton and Novato in the forefront of a sustainable future, adding to the regional potential for SMART to be a sustainable and successful system.

To illustrate how closely a commuter rail station at Hamilton fits the definition of a green land planning, I would cite some major points from the chapter on "Sustainable Land Planning" that I co-authored for the Urban Land Institute publication, "Green Office Buildings" in 2005:

1. "...One key component of the green land plan is easy access to regional transit."
2. "...A green land plan should include strategies to reduce the number of vehicle trips."
3. "...To make the development less dependent on automobiles, development should be focused on transportation nodes such as a commuter train station."
4. "...Large developments may wish to provide shuttles to and from local transit stops."

In summary, the proposed SMART commuter rail station at Hamilton is an unique opportunity to transform a major portion of the City of Novato into a sustainable community providing benefits of reduced auto trips, less traffic, reduced greenhouse gas emissions and energy use. The advent of the commuter rail station would produce a truly 21<sup>st</sup> Century prototype community.

C23-1 cont.

Comment Set C23, cont.  
Kalvin Platt



Please let me know if I can be of further assistance.

*Kalvin Platt*

Kalvin Platt, FAIA  
Chairman, SWA Group

[kplatt@swagroup.com](mailto:kplatt@swagroup.com)

**Responses to Comment Set C23**  
**Kalvin Platt**

C23-1      The positive planning aspects and environmental benefits of placing a station at the Hamilton site are noted.

## Comment Set C24 Marla Fields

Lillian Hames  
SMART General Manager  
750 Lindero Street, #200  
San Rafael, CA 94901

Dear. Ms. Hames,

I continue to be convinced that the introduction of a passenger rail system such as the one SMART is proposing will be highly beneficial to both Marin and Sonoma. SMART will help us immediately impact our emission reduction goals and will have the long-term benefit of allowing better land-use planning, by creating more walkable communities with easy access to transit, a necessary step to a more sustainable future. The following comments are meant to provide further clarification for some of the points in the SEIR.

### Executive Summary:

ES-1 Introduction and Project description: It would be helpful to note how SMART fits into Marin Countywide Plan that calls for passenger rail service and bicycle-pedestrian pathways as important modes for reducing emissions in the Executive Summary.

C24-1

ES-2 Novato South Station Alternatives: "The Downtown Novato site, while accessible, would have the disadvantage of not providing parking," add to the statement: "and would draw a portion of its ridership from the Atherton station 1 mile away".

C24-2

### Project Description:

Page B-3: While the focus of supplemental EIR review is on light versus commuter railcars, it should be noted that advances in railcar technology have recently included development of hybrid and hydrogen fuel-cell powered railcars. It would be helpful to notify readers that the light DMU is one of many final possible equipment choices that will be considered by SMART Board Management.

C24-3

Page B-10 Please note that all Hamilton residents reside within ¼ mile of existing complimentary shuttle.

C24-4

Page B-20: Please describe in more detail how freight levels were classified as "Speculative" or "Highly Speculative" in terms of the specific financial and environmental hurdles NCRA would need to cross to reach these levels of service.

C24-5

Page B- 19 – 23 It would be helpful to point out that NCRA and SMART are separate entities, not dependant on each other to commence, even though the study is designed to inform the Board of cumulative impacts for speculative and even highly speculative levels of service in addition to the levels of service already studied in original EIR.

C24-6

Page C.2-3: It would be helpful to clarify the various counties that make up both the North Bay and Bay Area Air Basins studied and the approximate percentage that is only Sonoma and Marin. Please detail which counties are included in the term "project corridor" and "study area" used later in the discussion.

C24-7

Page C.2-5: It should be noted for comparison sake that the diesel particulate matter from a SMART train is equivalent to that from a single car (as noted in white paper #6)

C24-8

## Comment Set C24, cont. Marla Fields

### Weekend Passenger Rail Service:

Page C.3-1: Please note the percentage of travel in general and vehicle miles travel specifically that is for non-work purposes.

C24-9

Page C.3-16: It is noted that travel by rail is safer than cars. How much safer?

C24-10

### Alternative Train Vehicles – light DMUs:

C.4-2/3: Please quantify the NOx figure both with and without the NOx absorption technology that SMART has committed to utilizing as was done in the previous section. Assuming it reduces NOx by ¾ like it did in discussion of weekend service, this figure would also drop below significance threshold, as all others already are.

C24-11

C.4-4: Please add bus and garbage truck onto the noise chart for comparison at same distance of 50 feet. Although impacts are already less than significant at 50 feet, it would be useful to determine how the levels change at 100 and 200 feet. At what distance does the ambient noise level reach 50 decibels, described as equivalent to “a quiet office”?

C24-12

### South Novato Station Location Alternatives:

C.5-24 Chart header is mistitled 2005 when it refers to 2025. Also, pick one of the three scenarios for Hamilton (we recommend option B is selected for analysis as it offers the most environmental benefits) and plug LOS into the chart so it is easy to compare versus no-project scenario. A footnote can direct reader to full chart of three options later in the report. SMART promises to pay their “fair share” of traffic mitigation measures outlined. What exactly does fair share mean? Will the local, Federal or State funds be required also, or is SMART willing to fund the complete mitigation should they not come through? Please show no project scenario LOS as the LOS without mitigation since it is not likely such mitigation would happen without SMART.

C24-13

C24-14

C24-15

C.5-33. The census data as written is confusing “The 2000 Census indicates that there were 5,200 people living within a half mile (walking distance), and a total of 10,100 people within a mile of the proposed station site. The Hamilton Field Plan contains 985 proposed dwelling units, and the Hamilton Army Airfield Reuse Plan Area contains an additional 1,171 proposed units. In total, assuming the existing average household size in Novato of 2.57 persons, this would result in an additional 5,500 residents in the area after construction.” I assume that construction has largely been completed since 2000? Please clarify. Please specify how many of the additional 5,500 residents reside within half mile of the station location so we can get an accurate total of number of residents within walking distance. Also, please note that Hamilton offers a complimentary shuttle which is within ¼ mile of all households and employees and factor that into ridership potential. Also add the planned 30,000 sq foot office building on Main Gate and the 100,000 sq foot retail center being constructed on Nave, within a mile of station site. What proportion of the Novato population resides or works within the Hamilton area? If the 5,500 residents are additive to the 10,100 who resided within one mile of Hamilton at the 2000 census date, than roughly 1/3 of the population of Novato resides within a mile of the Hamilton proposed site, even more when counting Hamilton employees.

C24-16

C.5-42 Since groundwater flows north in this former landfill area, and the station location is south, there is no potential impact.

C24-17

## Comment Set C24, cont. Marla Fields

### Additional Station Selection Comments:

If Hamilton is selected as South Novato station location, could SMART also add one or two peak hour trains to stop at downtown in addition to flagstop for special events such as Antique Car Show? How would that impact ridership and subsequent reductions in VMT and emissions?

C24-18

From a transit planning perspective, does it make sense to have two stations (Atherton and Downtown) less than 1 mile apart, followed by a 10 mile gap? Please clarify what percentage of Downtown's forecasted ridership that would be drawn from the Atherton station.

C24-19

How long is the station construction phase and what are potential mitigations for any impacts to nearby residents?

C24-20

How will the forecasted net reduction of vehicle traffic in the Hamilton area as a result of a station there result in a beneficial impact on air quality for Hamilton residents?

C24-21

Please note how SMART's commitment to make signal improvements around the Hamilton station intersection will benefit residents and employees (through increase in level of service versus no station alternative) during both peak as well as during off-peak travel times.

C24-22

How will noise/vibrations to Los Robles and Meadow Park residents who live very close to tracks (<50') compare if no station (railcar pass by at top speed) versus with a Hamilton station (railcars slow to approach station)?

C24-23

How does Hamilton ridership estimates compare with those at Atherton? As findings are presented in different format, it is difficult to make any comparison. The tenant management firm for the Hamilton Landing employment center, Barker Pacific, hired a research company to conduct their own employee survey. With over 200 survey respondents out of 1,200 employees, their findings were at a 90% confidence level. **They found that over 60% of employees would use SMART station to commute to work at least once per week, with 41% utilizing it 3 or more times per week.** How do these results compare to the modeled forecast of ridership in the SMART EIR? Please be more specific about source of ridership forecast. 40 – 50% is from the employees, but the other 50-60% is only listed as "nearby residents". How many of these riders will be from within ½ mile of the station, 1 mile of the station (within Hamilton), and how many new riders will commute into Hamilton to board there from outside Hamilton? What are the specific traffic benefits/impacts for each of the three different scenarios at Hamilton for those near the Main Gate versus Hamilton Parkway streets?

C24-24

C24-25

C24-26

As view from closest Hamilton residents to station is largely of newly planted trees, it is difficult to see the actual station elements in the artist rendering. Could you provide a sample of a

C24-27

## Comment Set C24, cont. Marla Fields

typical station graphic? Would the station design be able to accommodate the historic “mission” architecture of the Hamilton Area?

C24-27 cont.

The current ambient noise near the proposed Hamilton station site is currently list at 58dBA in the SEIR, and any additional noise impact from the proposed station is listed as “less than significant”; however, it appears reading were done at nearby Los Robles site. Can you please clarify in dBa what this would be with the station located in Hamilton and note if or how any of the closest residents (300 feet) would be affected.

C24-28

The fact that there are no plans for a bus hub in Hamilton is clearly stated (twice) in SMART’s SEIR. However, this continues to be a source of confusion for nearby residents. Please specify that ultimately, the Novato city council would need to approve any proposed bus facility site with community input.

C24-29

SMART’s EIR notes an average range of home value appreciation range for residents that reside within ½ mile (walking distance) of a station. How would the calculation of increased property tax revenue that could be put to public good compare for the various station options in Novato?

C24-30

Revised Cumulative Impacts with Freight Service (north of highway 37)

C.6-5 Please make it clear that any noise impact is not due to SMART train, but is limited the estimated 10 to 20 residences (as estimated in SEIR) north of highway 37 who reside within 50 feet of potentially increased freight service projections. This is an important point of reference and should be noted at the beginning of the paragraph.

C24-31

Also, how does the noise reduction benefit from shifting 10% to 14% of heavy cargo movement from trucks to freight trains (SMART SEIR C.6.2.1) offset other noise impacts from NCRA’s freight service?

C24-32

How can noise of freight trains be reduced by reducing speeds to 25 mph?

C24-33

How would noise of freight alone be increased if SMART was not operational and the tracks were thus not upgraded by SMART to the continuously welded type and horn-cancelling quiet zones were not funded?

C24-34

The SEIR report should clarify what “highly speculative” means in terms of hurdles, both financial and environmental, that NCRA would need to cross to allow such level of service.

C24-35

How would impacts to potential traffic delays at intersections from lengthy freight trains be increased if SMART were not running during peak congestion time, allowing NCRA to operate freight during that window?

Additional Comments:

Could you add a discussion of possible “green” elements that could be incorporated into the project and how they would affect reduction of emissions and greenhouse gases? Elements might include solar-powered signals and ticket vending machines from panels on station

C24-36

**Comment Set C24, cont.  
Marla Fields**

rooftops, integrated pest management techniques for weed control and drought-tolerant landscaping.

**C24-36 cont.**

Thank you for the opportunity to comment. I look forward to the day the people of Marin and Sonoma will have a clean, reliable, convenient, comfortable and sustainable way to bypass congestion like SMART. As a resident of Hamilton, I am hopeful that we will, through a SMART rail and trail station in our area, someday become the walkable community with easy access to transit that we were promised upon purchasing our homes, decreasing our reliance on 101 with far fewer cars.

Sincerely,

Marla A. Fields

## **Responses to Comment Set C24**

### **Marla Fields**

- C24-1 See response B5-1.
- C24-2 The point about the Downtown Novato station site competing for ridership with the Novato North station (Atherton) is noted elsewhere in the DSEIR (see DSEIR page C.5-5).
- C24-3 Comment noted. See response C22-1.
- C24-4 The Hamilton Shuttle presently serves most of the area, but based on the information we have, does not serve the areas along Marin Valley Drive and Bolling Circle within a quarter-mile walking distance.
- C24-5 See Master Response 2.
- C24-6 The fact that NCRA and SMART are separate entities and not dependent on each other is explained on page B-20 of the DSEIR and further addressed in Master Response 2.
- C24-7 The geographic area of the Bay Area Air Quality Management District and the Northern Sonoma County Air Pollution Control District is described in the 2005 Draft EIR, Section 3.5.1, Regulatory Setting (p. 3-53). As noted in that section, attainment designation is determined by the local air district from basin-wide data. Local ambient air quality monitoring data shown in the DSEIR Table C.2-4 is specific to Marin and Sonoma Counties.
- C24-8 Comment noted. Particulate matter from DMUs is diesel particulate matter from the exhaust; the particulate matter from on-road motor vehicles is from both exhaust and tire wear.
- C24-9 This information is not readily available, and it is unclear how it bears upon the decisions the SMART Board must make about the proposed project's environmental impacts.
- C24-10 As noted in the 2006 FEIR, Master Response P, travel by rail is approximately 67 times safer than motor vehicles for passengers and approximately equally as safe for pedestrians and cyclists.
- C24-11 Table C.4-1 shows that total NO<sub>x</sub> emissions for light DMUs with reductions in study area motor vehicle traffic would be less than the significance threshold. Because light DMU vendors have not provided specifications on NO<sub>x</sub> emissions with add-on control, at this stage in project development, Table C.4-1 shows only the emissions before considering implementation of the environmental compliance measures (see p. C.4-2).
- C24-12 The 2005 Draft EIR showed heavy truck and bus noise levels in Table 3.7-1, and the 2005 Draft EIR (p. 3-124) shows how noise levels decrease approximately 6 decibels for every doubling of distance from a point source.
- C24-13 The column headings in Table C.5-1 should read 2025 No Project, and 2025 with Proposed Project (not 2005). This will be corrected in the Final SEIR.
- C24-14 "Fair share" means the proposed project's percentage contribution to the traffic at the intersection. This is a standard term in impact fees. For example, if SMART contributes 10% of the total traffic at an intersection that requires signalization, SMART would be responsible for 10% of the total cost of signalization.

- C24-15 The consultant believes the portrayal as it stands is fairer than the comment proposes. It is likely that some intersections would require mitigation, with or without the proposed project, and would eventually have to be done with or without the project. The mitigation measures proposed are the same as measures proposed in the City's own transportation plan (prepared by W-Trans). Therefore, mitigation measures are likely to occur without the SMART project.
- C24-16 The following information was sent (via fax) from the City of Novato (Hans Grunt) to Dowling Associates on 10/18/07, and was used in the analysis (SFDU means single-family dwelling unit):
- A. All housing development (\*constructed, \*\*under construction, \*\*\*approved for construction, and \*\*\*\*proposed:
    - Hamilton Park \*, 112 duplex homes on 8 acres
    - Villas at Hamilton\*, 130 affordable apartments for low and very low income seniors on 3 acres
    - Traditions\*, 143 single family homes on 18 acres
    - Southgate\*, 152 single family homes on 25 acres
    - Bayside \*, 142 SFDU on 21 acres
    - Hamilton Meadows\* (aka Newport and Sunny Cove) 235 SFDU on 37 acres
    - Senior Site\*\*\*\* (of Hamilton Pkwy), 25+ very low income affordable senior apartments on 1.5 acres
    - Inspiration at Chapel Hill\*, 19 SFDU on 9 acres
    - Hangar Avenue\*\*\*, 27 SFDU
    - Total units in the Hamilton Field Plan Area: 985 units
  - B. All housing development for Hamilton Army Airfield Reuse Plan Area as of 10/24/05:
    - Pointe Marin (Rafael Village)\*, 344 SFDU, 100 senior condos, 200 acres
    - Meadow Park Townhomes & Creekside/Bay Vista Apartments\*, 708 units (351 townhomes, 297 apartments, 60 transitional family units)
    - San Pablo\*, approved tentative map for 19 SFDU
    - Total units in the Hamilton Army Airfield Reuse Plan Area, 1,171 units
- C24-17 Because of the large, industrial nature of the Landfill #26 contaminated site, its proximity to the Hamilton Station, and its status of incomplete remediation, the site is considered to have a moderate, but less than significant, potential to affect Hamilton Station despite the opposite direction of measured groundwater flow at the site. No changes to the text are necessary.
- C24-18 SMART could provide special service for unique events. However, the SMART project proposal is for regularly scheduled passenger operations between 14 stations, primarily during peak hours. It is unlikely that additional peak period stops at a second Novato South Station would be added due to costs, impact on train schedules and the size of Novato's population relative to other large cities with only two stations, such as Santa Rosa, Petaluma and San Rafael.
- C24-19 Stations spaced about one mile apart are not uncommon on commuter rail lines, although they are not considered optimal because the short distance limits a train's ability to accelerate to a higher cruising speed. (An example of closely spaced stations is three Caltrain stations on the Peninsula: Atherton at milepost 27.8, Menlo Park at milepost 28.9, and Palo Alto at milepost 30.1.) Because the Novato North station would have all-day parking, and Downtown Novato would not, it is likely that Novato North would attract all of the park-and-ride patrons from

- Novato, whereas Downtown Novato would attract riders who access the station via walk, drop-off, and bicycle modes. The net effect of this is difficult to quantify, but qualitatively is thought to be a very small reduction in ridership at the Novato North station. This change is not large enough to alter any of the impacts of the Novato North station set forth in the 2006 FEIR.
- C24-20 General construction disturbances and associated mitigation measures are fully identified in the original 2005 Draft and 2006 Final EIR. The construction period for the Hamilton (Novato South) station would be similar to other stations, most likely between four and six months. Much of the impacts would be related to grading, drainage and utility installation, paving and erection of platform canopies and appurtenances. The 2006 FEIR contains detailed environmental compliance measures (e.g., construction phasing and traffic management plans, limiting construction activities to daytime hours, and dust control measures) and mitigation measures to reduce construction disturbances to the surrounding community.
- C24-21 Although the exact change in emissions in Hamilton cannot be quantified, the analysis does show a net reduction in VMT, which in turn would reduce emissions in the area.
- C24-22 The installation of signal improvements would reduce overall delays by providing a dedicated northbound right turn phase, which would reduce the delays for employees traveling to work in the morning and residents returning in the evening.
- C24-23 In general, lower levels of noise and vibration occur when rail traveling speed is reduced. The presence of a Hamilton station would thus slightly reduce the noise impact of the train along the corridor near the station.
- C24-24 The Novato North (Atherton Avenue/San Marin) station would carry approximately 175-190 boarding riders per day (see 2006 FEIR, Table C-1). This presumes the Novato South station is at Roblar Drive. If the Downtown Novato site were selected for the Novato South station, it could reduce this ridership somewhat, due to riders who might now choose to use Downtown Novato rather than Novato North.
- C24-25 See response C19-5. The survey is interesting, but it is not appropriate to infer that non-respondents are just as likely to use rail service as respondents would be. In fact, the opposite is likely to be true. Also, “would you...” type surveys often result in biases toward answers that are more socially acceptable. This is why transportation planners do not typically use this type of survey to assess ridership potential. Approximately half the Hamilton Station’s ridership would be from residents, and half from employees in the area. The exact location (half-mile vs. mile band) is difficult to predict and is not that relevant to the selection of where a Novato South station should be located.
- C24-26 The traffic impacts of the three different Hamilton subalternatives were shown in the Draft SEIR in Table C.5-4 (page C.5-32). They show that the differences in traffic impacts are very small, due to the relatively small overall number of vehicle trips involved. It should also be pointed out that most SMART traffic would occur early in the morning, or after the traditional PM peak hour. This is because the longer nature of SMART trips would require patrons to start their trips earlier, or end them later, than would occur with shorter trips.
- C24-27 The Hamilton station, without the landscape screen, is shown in DSEIR Figure C.5-7b. The only potential building would be the bicycle station, which is shown on the northern end of the site. Other structures include the platform shelter, which will not be enclosed. See DSEIR Figures B-11a and B-11b (page B-17 and B-18) for conceptual site drawings. Also, Figure

- C.5-2b shows a closer view of how the platform shelter would appear. Final design of station structures will include consultation with local jurisdictions.
- C24-28 The noise impacts associated with locating the station at the Hamilton Station site are described in SDEIR Section C.5.3.8, which explains that none of the sensitive land uses (including residences) near the Hamilton Station site would experience a significant noise impact from train pass-bys. See response C19-8 for additional information on background noise levels at this location.
- C24-29 A bus facility site is not part of the proposed SMART project and the SMART project does not rely on a new bus facility site in the Hamilton area. A bus facility would be subject to separate environmental review and approval by both the bus agency and the City of Novato.
- C24-30 Estimating the total, aggregated rise in property value in the Hamilton area resulting from a rail station is beyond the scope of the DSEIR and is not required by CEQA. Moreover, a rise in property value would not translate into an equivalent rise in tax revenues, due to state-imposed limitations on annual property tax increases. See 2006 FEIR Master Response T regarding property values.
- C24-31 Comment noted. The conclusions regarding cumulative impacts for noise, including the SMART project's contribution to any impacts, are adequately identified in DSEIR Section C.6.4.
- C24-32 See response B5-19.
- C24-33 SDEIR Table C.6-1 shows the resulting noise levels for NCRA proposed freight service at 25 miles per hour. At that speed, freight train pass-by noise would not exceed the significance threshold of 60 dBA Ldn and the cumulative noise impact would likewise be less than significant.
- C24-34 Without the proposed SMART improvements to the track structure (e.g., continuously welded rail (CWR)), freight trains on the existing jointed track will produce more noise than trains operating on CWR. (Some portions of SMART track already have CWR.) Jointed track causes about 5 dBA more noise than the continuously welded track that would be used with the SMART project. If Quiet Zones are not established, freight trains would be required to sound their horns at all public crossings. See 2006 FEIR Master Response Q and FSEIR Master Response 5 regarding Quiet Zones.
- C24-35 See Master Response 2 regarding "highly speculative" freight service. If there were no SMART service, NCRA would have the ability to run freight trains at any time of day. It is possible that some of those times would be during peak traffic hours. If this occurred, the individual delays to motorists during peak hours would be longer, depending on the level of freight service. This would not be an impact of the SMART project.
- C24-36 The SMART 2006 FEIR's list of environmental compliance measures incorporated into the SMART project already includes a commitment to using "green building" materials as well as drought-tolerant landscaping, among other things (see 2006 FEIR, p. 4-11). In addition, SMART has been exploring green practices for station design and maintenance procedures, such as solar-powered signals and integrated pest management and weed control. Although specific "green" features will be identified in the final design and engineering phase, SMART is committed to pursuing energy efficiency measures and the use of renewable energy. Implementation of these measures would further reduce the project's GHG emissions and help the state move to a low-carbon future, above and beyond the beneficial decrease in greenhouse gases that the project realizes by lowering VMT (Impact AQ-3).

**Comment Set C25**  
**Chrit Longmaid**

**From:** Chrit Longmaid [mailto:CLongmaid@NELSONHR.COM]  
**Sent:** Tuesday, April 22, 2008 1:31 PM  
**To:** Kathy Cochran  
**Subject:** Comments regarding SEIR for Sonoma-MARin Area Rail Transit Project (SCH 2002112033)

Kathy,

After attending the public meeting on April 16, 2008, I wanted to share my opinion. I support the decision to move forward with the light DMUs. However, I would strongly recommend that future electric engines are considered when the project proves successful. The overall design of the project should include plans for future solar installations that would power the electric trains as well as the stations.

C25-1

I fully support weekend service as well as freight operations. Frequency should be determined by balancing the demand for additional passenger as well as freight service with public tolerance of the noise and traffic impacts (or lack there of). Adjusting the frequency can always be made later on.

C25-2

I would recommend having the Hamilton site as an alternative to the Novato South station. Thank you for allowing me to share my opinion on this fabulous project!

C25-3

## **Responses to Comment Set C25**

### **Chrit Longmaid**

- C25-1      Comment noted. SMART will evaluate all viable and proven energy saving opportunities in the final engineering of both rail vehicles and stations. Solar powered station lighting and railroad crossings are currently under consideration.
- C25-2      The comment in support of weekend service as well as freight operations is noted.
- C25-3      The comment in support of the Hamilton site is noted. Comments on the merits of the proposed station will be considered by the SMART Board when selecting the Novato South station site.

Comment Set C26  
Lionel Gambill

COMMENTS ON SMART DSEIR

April 18th, 2008

Lionel Gambill

Section C.4 could be improved in several ways, most notably by adopting standard railroad practice: comparing vehicles in ways that make cost-efficiency, performance, and productivity comparisons meaningful. For example, passenger railroads compare vehicle capital costs *per passenger seat*, and emissions as well as operating and maintenance costs *per passenger-mile or per seat-mile*. Similarly, freight comparisons are in *ton-miles*. See the attached fact sheet from Transportation Research Board, "Characteristics of SPRC's in North American Urban Transit Systems."

Some of what is involved here goes beyond studying environmental impacts, but it's important to relate those impacts to meaningful and realistic operational, economic, and marketing considerations.

Using comparable units of measure is simple logic. If you were comparing prices of two different-size jars of peanut butter, a per-jar cost would not be meaningful. You'd be more likely to get your money's worth by comparing dollars per ounce of net weight.

As an example of how other regional railroads would handle this, the capital cost for a Siemens Desiro vehicle is \$30,360 per passenger seat, whereas the capital cost of a Colorado Railcar double-deck two-car trainset (one car powered, one unpowered) is \$17,000 per passenger seat.

If the emissions of the "light," i.e., non-FRA-compliant DMU were in fact lower *per passenger-mile or per seat-mile*, then they would be, as stated on p. C.4-1, lower than for the Colorado Railcar FRA-compliant double-deck DMU.

But we don't know because the emissions are not given in the DSEIR in terms of passenger-miles or seat-miles. Likewise, we don't know whether the non-compliant DMU is more fuel-efficient as claimed because no data are provided for gallons of fuel *per passenger-mile or per seat-mile*.

We do know that the Colorado two-car double-deck trainset weighs less *per passenger seat* than the "light" Desiro:

Desiro, tons per passenger seat, 0.6

Colorado, tons per passenger seat, 0.4

What the DSEIR says about passenger capacity is odd. The Desiro, an articulated 136.8-foot-long two-car unit, has a seating capacity of 139. This is compared with a single 89-foot Colorado single-level railcar, which seats 90. And where is the evidence that use of non-FRA-compliant vehicles would reduce GHG emissions per passenger-mile or per seat-mile? Maybe it would, but the DSEIR lacks the data in comparable units of measure.

C26-1

C26-2

Comment Set C26, cont.  
Lionel Gambill

It would be impractical and short-sighted for SMART not to choose equipment that maximizes its room to grow to meet growing demand. (This was addressed to some degree by the SMART Vehicle Advisory Committee in 2001.) SMART is committed to a train-length limit of 290 feet (distance between Third and Fourth Streets in San Rafael). With the Desiro a SMART train could never seat more than 268 passengers; that's with two units, each 136.8 feet long. Even if the non-compliant DMU had lower emissions per passenger-mile, how meaningful would that be if it reduced SMART's capacity to remove cars from the highway?

C26-3

For the sake of candor the DSEIR should note that adding another powered car to a two-car double-deck Colorado trainset provides a maximum seating capacity of 594, and that's in comfortable 32-inch-pitch railroad seats, not transit seats, and every car has an ADA-accessible restroom. [The Desiro can be spec'd for a restroom, but Sprinter chose not to, a reasonable decision for a rail corridor only 22 miles long.]

C26-4

The two-car Colorado trainset would seat 406 passengers. It would be 178 feet long, the three-car train 267 feet long. The Colorado double-deckers can be operated as a one-car train seating 188, a two-car train seating 406, or a three-car train seating 594.

Why would SMART want to put a low cap on its ability to meet travel demand? This would be especially important for recreational travel. Large seating capacity per vehicle would be a must if SMART hopes to serve Infineon Raceway, with its immense weekend crowds. Granted, shorter headways would increase passenger capacity per hour, but when you cut headways in half you double the labor cost per passenger-mile. To equal the three-car double-deck train's seating capacity using non-compliant vehicles SMART would have to run five Desiro units having a total length of 684 feet. At best, that might be two two-car trains and a single unit. Even then, the labor cost per seat-mile would increase three-fold.

C26-5

Inter-operability is a major issue in terms of FRA compliance and was treated as such during deliberations of the Vehicle Advisory Committee. Almost all regional railroads in the U.S. today have either used double-deck vehicles from the outset, like Caltrain, ACE, and Coaster, or are converting to bi-levels, like Virginia Railway Express. To ignore the benefits in productivity, cost-efficiency, back-up capacity, and customer satisfaction would be a serious blunder.

Again, SMART must look at NET impacts, and that would be sensitive to the train's capacity to take people out of their automobiles. Marketing issues come into play in determining rider capture. FRA-compliant DMUs have a ride quality equal to the Alstom-built bi-level coaches on Amtrak California trains (Capitol Corridor, San Joaquin, and Pacific Surfliner). Articulated non-compliant DMUs are known to have a harsh ride on jointed rail.

Granted, SMART plans to replace all jointed rail with continuously welded rail, but with a quarter-cent tax and some uncertainty about state and federal funding SMART may have to make do with good until it can afford best, and to ask riders to get out of their Lexuses and BMWs for anything less than a top-quality ride is not wise in terms of marketing or ecology. Marin/Sonoma is a luxury market and treating it as such pays off in maximizing the mode shift from highway to railway—and that means lower net emissions.

Comment Set C26, cont.  
Lionel Gambill

The VAC's recommendation to the board in 2001 was to give preference to locomotive-hauled bi-levels, with secondary consideration for FRA-compliant DMUs and non-compliant DMUs as a third choice. The board changed that to give preference to FRA-compliant DMUs, with locomotive-hauled bi-levels and non-compliant DMUs in second and third place, respectively.

I think that was a wise decision.

SMART needn't take my word for the issues I'm raising. It would be an easy matter to consult with recognized professionals in the industry such as Arthur Lloyd at Caltrain, Brian Schmidt at ACE, or Gene Skoropowski at Capital Corridor. It might also be worthwhile to consider Tom Matoff's comments about vehicles at the July 1999 SMART meeting.

C26-5 cont.

Comment Set C26, cont.  
 Lionel Gambill

TRANSPORTATION RESEARCH BOARD  
 AP070(1) SELF-POWERED RAIL CAR TECHNOLOGIES SUBCOMMITTEE

This fact sheet describes 75 SPRCs currently operating, on order, or in engineering for North American urban transit applications.<sup>1</sup>

Characteristics of SPRC's in North American Urban Transit Systems <sup>2</sup>	Category 1				Category 2			Category 3	
	Budd/AMF Remanufactured 1950's RDC (Dallas)	United Transit Systems Single Level DMU (Triangle Transit)	Colorado Rail Car		Bombardier Talent BR643 (Ottawa)	Siemens VT 642 Desiro (Calif)	Stadler GTW 2/6 (NJT)	Stadler GTW 2/6 (Austin TX)	
			Single Level DMU (Fla. Tri-Rail)	Double Deck DMU (Fla. Tri-Rail)					Single Level DMU (Portland Tri-Met)
First Year of Service	1997	2008	2005	2006	2002	2007	2004	2008	
Fleet Size	13	14	1 Power Car	3 Power Cars 2 Trailer Cars	3	12	20	6	
Configuration	Single Car	Pairs	Single Car (Power car) Pairs (Power + Trailer)	Single Car (Power car) Pairs (Power + Trailer)	Triplets	Single Car	Single Car	Single Car	
Seating Capacity	96	80	92 190	188 406	135	139	90	90	
Standees <sup>3</sup>	NA	160	148 296	75 154	150	90	94	94	
Total Passenger Capacity	NA	240	240 486	263 560	285	229	184	184	
Approx. Capital Cost (millions)	\$1.80	2.64	\$2.90 \$5.00	\$4.20 \$6.90	\$3.90	\$4.22	\$3.60	\$5.40 <sup>b</sup>	
Total Horsepower	600	950	1,200	1,200	845	864	750	750	
Engines	2	2	2	2	2	2	1	2	
Drive System	Diesel Mechanical	Diesel Mechanical	Diesel Mechanical	Diesel Mechanical	Diesel Mechanical	Diesel Mechanical	Diesel Electric	Diesel Electric	
Weight (tons)	68	71	82 154	98 180	80	75	58	58	
Length (feet)	85	85	85 170	89 178	160	136.8	103	103	
Height (feet)	14.6	14.5	14.9	19.8	13.2	12.5	12.8	13.2	
Width (Inches)	120?	122	120	120			118	114.2	
Floor Height (Inches)	48?	51	51	51 51 & 25				22.6	
Min. Curve Radius (feet)	NA	300	250	250	328		132	328	
Tons/Seat	0.7	0.8	0.9 0.8	0.5 0.4	0.6	0.6	0.5	0.6	
Capital Cost/Seat	\$18,800	\$33,000	\$31,500 \$26,300	\$22,300 \$17,000	\$28,889	\$30,360	\$40,000	\$60,000	
Capital Cost/Passenger	NA	\$11,000	\$12,000 \$10,300	\$16,000 \$12,300	\$13,684	\$18,428	\$19,565	\$29,348	
HP/Ton	9	15	15 8	12 7	11	12	13	13	

<sup>1</sup> In addition to the new urban applications, various North American railways also use vintage Budd RDC equipment to operate limited leisure-market services in Alaska, Canada, Syracuse NY and Cape May NJ.

<sup>2</sup> Compiled by David Nelson of KKO and Associates, LLC. (Please submit updates/corrections to dnelson@kko.com)

Last Update: January 27, 2006

## **Responses to Comment Set C26**

### **Lionel Gambill**

- C26-1      See response C1-3. Energy consumption and emissions depend on the number of train-miles traveled, not the number of seats per train. Although it might be helpful for decisionmakers and the public to view a comparison of energy or emissions on a per-seat basis, this type of information would have little meaning in the environmental impact analysis.
- C26-2      See responses C1-3 and C26-1. The overall decrease in greenhouse gases would occur when compared to use of more energy-consuming modes of travel (i.e., auto and bus). With this regional perspective, there is no need to calculate the greenhouse gas emissions on a per-seat basis.
- C26-3      Comment noted. Please note the purpose of the DSEIR is to evaluate the environmental impact of a representative light DMU vehicle per CEQA, and not to make decisions about vehicle procurement. The vehicle selection process will be a public process with the SMART Board of Directors making the final decision. Public input will be sought in this process. Also, see response C26-1.
- C26-4      Commented noted.
- C26-5      Comment noted. SMART concurs that all available heavy and light DMU commuter rail vehicle models should be considered in the final vehicle selection, particularly in consideration of energy requirements and vehicle capacity.

## Comment Set C27 Susan Ristow

SMART DSEIR Comments

Page 1 of 3

*Susan Ristow*

April 22, 2006

Lillian Hames  
SMART General Manager  
750 Lindero St. #200  
San Rafael, CA 94901

RE: COMMENTS on SMART Draft Supplemental EIR

Dear Ms. Hames,

We appreciate the opportunity to submit comments on the SMART Draft Supplemental EIR (DSEIR).

As stated in your Cover letter to the DSEIR, one of the purposes of the DSEIR is to examine the changes in cumulative impacts due to "...a change in the level of projected future freight rail service on the SMART corridor (compared to the level of freight service that was projected and evaluated in the SMART 2006 Final EIR)" and, as stated in your Executive Summary, the DSEIR must contain "... the information necessary to respond to the project changes, changed circumstances, or new information that triggered the need for additional environmental review.. "

Unfortunately, SMART is making the same mistake in the DSEIR as it did in the previous FEIR, by depending on NCRA statements, rather than a certified NCRA EIR, especially now that NCRA is currently in the environmental review process. Given the potential impacts on traffic, air quality, health, and other vital issues, SMART needs to base its DSEIR on NCRA's final projections in the NCRA's certified EIR.

Until the NCRA EIR is certified, SMART continues to put forth environmental reviews based on changing NCRA projections. There is nothing binding the NCRA to stay within the current projections, just as there was nothing binding the NCRA to stay within its prior projections.

As has been clearly demonstrated, the NCRA can and has changed freight projections. Until the NCRA EIR is certified, any environmental review by SMART fails on its face to provide adequate information to either the public or the reviewing agencies to make informed decisions.

C27-1

Comment Set C27, cont.  
Susan Ristow

SMART DSEIR Comments

Page 2 of 3

Also, CEQA mandates that areas of controversy be addressed (CEQA Guidelines Section 15123) in the EIR process. SMART's DSEIR acknowledges that an area of controversy regarding SMART's operation is based on the unknown number of freight trains that would be operating on the shared rail line. SMART's DSEIR then claims to address this area of controversy by providing information on possible cumulative impacts associated with a range of projected freight service operations, rather than on a certified NCRA EIR and thus eliminate the controversy over the speculative information.

C27-1 cont.

SMART should not place expediency, political (i.e. getting a sales tax measure on the November ballot) or otherwise, over the CEQA mandate to provide the public and reviewing agencies with accurate data. There can be no dependable, binding, or complete data until the NCRA EIR is final and certified. Otherwise, the reviewing agencies and the public in general cannot be fully informed regarding the impacts of the whole of the project.

The interdependence between SMART's proposed passenger rail service and the NCRA's proposed freight service is undeniable. AB-2224, the enabling legislation, defines the legal relationship between SMART and NCRA. NCRA and SMART are financially connected due to revenue sharing on the shared track portions. SMART may even be precluded from using a more environmentally superior rail car as a result of NCRA operations.

C27-2

Given this interdependence, the attempt to certify a SMART SEIR at this stage amounts to a circumvention of CEQA. An adequate SMART SEIR would utilize legally binding numbers for freight operations, based on a certified NCRA EIR.

Regarding SMART operations, the following issues, some of which were brought up at the SMART DSEIR hearing in Novato, need to be addressed:

You've said that 60-car long trains may delay traffic at the at-grade crossings for 3 minutes for trains traveling 20 miles per hour. In downtown Novato, the crossings at both Olive and Grant are within a few hundred yards of each other. Could both of these arteries be blocked simultaneously? What would these delays mean to emergency services if a long freight train were stalled at intersections? Which neighborhoods would be impacted by reduced emergency services? How would Trader Joe's and Whole Foods markets be affected by emergency service delays and by daily at-grade crossing delays?

C27-3

According to the DSEIR, nighttime freight operations would likely occur because the freight operator can run freight trains at night for their own operational needs. Please discuss how many nighttime freight trains the public can expect. Can SMART legally control the dispatch of trains at night?

C27-4

You've talked about Quiet Zones and your willingness to work with cities to establish them. Have there been evaluations done to determine the cost? How many Quiet Zones can SMART afford and which neighborhoods will benefit from

C27-5

Comment Set C27, cont.  
Susan Ristow

SMART DSEIR Comments

Page 3 of 3

them and which neighborhoods will not have Quiet Zones? For residents in northern Novato, how much difference would Quiet Zones make, given the other noises emanating from freight trains?

C27-5 cont.

There are parks in Novato used by children (Slade Park and the Olive Tot Lot), which are close to pedestrian at-grade crossings. How would they and other proximate recreational sites be impacted by freight trains operating in the vicinity?

C27-6

How many residences would be impacted at night in neighborhoods near the tracks, along Manuel Dr., Lamont and other streets?

C27-7

There are Motels in northern Novato such as the Travel lodge just north of an at-grade crossing at Rush Creek Place. How would freight operations including train horns and other noises at night, affect their guests? Have they and other impacted businesses been contacted?

C27-8

The DSEIR does not mention sleep loss, nor expected loss in residential property values associated with significant noise and vibration impacts. Please discuss these impacts.

C27-9

Would diesel exhaust accumulate in nearby residences and businesses?

C27-10

The Novato Community Hospital is virtually adjacent to the tracks. How would vibrations, sound, and other impacts affect their operations and their patients?

C27-11

The NCRA's predecessor is a known polluter with a long record of spilling toxins in the vicinity of the tracks. Given this record, will SMART have any authority, through operating or other legally binding agreements, to ensure that NCRA operates in a responsible fashion?

C27-12

An adequate SEIR will address these questions regarding the cumulative effect of combined freight and passenger operations on a single-track system.

Thank you,  
  
Susan Ristow

N.B. Sent via E Mail to kcochran@sonomamarintrain.org on April 22, 2008

## Responses to Comment Set C27

### Susan Ristow

- C27-1 See Master Response 2 and responses B1-1 and B7-4.
- C27-2 See Master Response 2 and response B7-4.
- C27-3 It is possible for a longer freight train to block both Olive and Grant Avenue simultaneously. But a train “stall” is extremely rare, since a longer train would have two locomotives (one of which can be used if the other fails), and because NCRA/NWP plans to use newer locomotives that are less prone to failure than older locomotives would be. Whole Foods’ primary access is from DeLong Avenue and would not be affected by rail freight operations. DeLong Avenue is grade separated over the SMART tracks.
- C27-4 Contrary to the comment, the DSEIR does *not* say that nighttime freight operations would likely occur. See response A1-3.
- C27-5 Quiet Zone designations would eliminate one source of noise from trains, i.e., the sounding of train horns at at-grade crossings. See Master Response 5 for additional information regarding Quiet Zones.
- C27-6 Public safety was addressed in the original 2006 FEIR. As described in Section C.6 of the Draft SEIR, with implementation of the proposed at-grade crossing safety devices, fencing, multilingual signage, and the public safety awareness program proposed by SMART (Operation Lifesaver), the cumulative risks to pedestrians would be less than significant overall with the addition of freight service. It is anticipated that schoolchildren that use parks in the vicinity of pedestrian at-grade crossings would benefit from Operation Lifesaver, and it is anticipated that younger than school-age children would be accompanied by an adult. In addition, the stringent state and federal safety regulations that apply to rail operations would continue to ensure the safety of pathway users. (See also the safety measures listed in the 2006 FEIR pp. 4-8 through 4-12, Environmental Compliance Measures.)
- The cumulative noise impacts of freight service on sensitive receptors, including parks, along the rail line are disclosed in DSEIR Section C.6.4.1. As noted in the DSEIR, there would be at most six freight train pass-bys per day (and none on Sunday) if NCRA reaches the full level of freight service projected for its Russian River Division Freight Rail Project.
- C27-7 The 2006 Final EIR Table 3.7-5 shows that homes would need to be closer than 40 feet for a noise impact to occur during passenger train passbys in this area, and no homes at Lamont Avenue or Manuel Drive are this close to the tracks. Furthermore, SMART trains will not be operating during late night hours. However, as presented in Table C.6-1 in the DSEIR, freight operations may result in significant noise impacts, depending on freight speeds and distance of homes to the tracks.
- C27-8 Sensitive noise receptors, including lodging and hospitals near the rail line that would be affected by train horn noise, are also reported in the 2005 DEIR and 2006 FEIR in Section 3.11 for land use and Section 3.12 for public facilities and safety. Lodging (hotels and motels) are treated in the same category of noise-sensitivity as residences. See also response C27-6.
- C27-9 See response B1-41. Impacts on property values are not an environmental impact under CEQA. See also response B3-33.

- C27-10 Diesel particulate matter, like other pollutants, would circulate in the ambient air, but would not disproportionately accumulate in homes.
- C27-11 The Novato Community Hospital would be more than 100 feet from the passenger or freight service, which would be a sufficient distance to isolate these uses from any adverse noise and vibration impacts (DSEIR p. C.6-15).
- C27-12 This is not a comment on the adequacy of the DSEIR. NCRA and its operator must comply with all applicable federal, state and local laws and regulations governing freight operations and cargo. See also responses B7-4 and C18-9.

Comment Set C28  
Willard Richards

April 23, 2008

Lillian Hames, General Manager  
SMART  
750 Lindero St., No. 200  
San Rafael, CA 94901

Re: Comments on Section C.4 of the Draft Supplemental EIR (DSEIR)

Dear Lillian:

Section C.4 of the DSEIR expands the range of vehicles included in the environmental studies to light diesel multiple units (DMUs). This addition to the environmental studies provides greater freedom and flexibility in the vehicle selection process, which may turn out to be very valuable. However, this section does not provide an equal evaluation of the two types of DMUs, and contains statements biased toward the light DMUs that are not correct. It is the purpose of these comments to correct those biases to help the future vehicle selection process proceed on a level playing field.

C28-1

Section C.4 uses a single-level Colorado railcar with a trailer as the example of the heavy DMU and compares light DMUs with this trainset. The possibility of using the bi-level Colorado Railcar described at [www.coloradirailcar.com](http://www.coloradirailcar.com) should be included in the analyses. This single-car DMU seats 188 passengers and can pull a low-floor trailer with 200 seats. Fuel efficiency and other comparisons between heavy and light DMU should include a comparison of one bi-level Colorado Railcar with 188 seats with the two-car light DMU with 130 seats. It is my understanding that the vehicle weight and purchase cost per passenger seat are smaller for one bi-level Colorado Railcar than for the two-car light DMU analyzed in this section of the DSEIR.

Section C.4.1 contains the statement, "*there is essentially no transportation impact of using the light DMU.*" This statement should be replaced by an analysis of the operational advantages of using heavy DMUs, which are not subject to the same requirements for the time separation from freight as light DMUs.

C28-2

It is widely expected that after SMART has been operating a number of years, passenger rail service will be extended into counties that adjoin the SMART district. Passenger service to the east that connects with the Capital Corridor and the rest of California will be especially desirable. The startup of such service is included in the Regional Rail Plan prepared for the Metropolitan Transportation Commission. Section C.4.1 should include a discussion of the relative merits of light and heavy DMUs for potential use in expanded service. This discussion should consider the operational simplicity of being able to use the same DMUs for both SMART operations and the expanded service.

C28-3

## Comment Set C28, cont. Willard Richards

Section C.4.2 acknowledges that light DMUs may be restricted to operating at a lower speed than heavy DMUs. This discussion should be expanded to comment on the smoothness of the ride at high speed in the two types of vehicles. It is generally acknowledged that heavy DMUs offer a smoother ride at high speed than light DMUs

C28-4

Section C.4.2 begins with the statement, “*Use of the light DMUs would reduce emissions from the proposed SMART project.*” This statement should be re-evaluated using the comparison between light and heavy DMUs recommended above.

C28-5

The first paragraph under the heading, Impact AQ-2 contains the statement, “... *the light DMUs would cause lower amounts of emission of each pollutant per gallon of fuel burned.*” This statement is incorrect. For carbon dioxide, the emissions from any diesel engine are the same per gallon of fuel burned. Essentially all the carbon in the diesel fuel consumed by any type of diesel engine is emitted as carbon dioxide, so the carbon dioxide emission per gallon of fuel burned are the same for all engines. For the other pollutants, the emissions depend on the exhaust aftertreatment, e.g., the types of catalytic converters and particle traps used. Either very good or very bad exhaust aftertreatment systems can be used on either light or heavy DMUs. When SMART purchases its rolling stock, it will have some say in the specifications of the exhaust aftertreatment systems in the vehicles it purchases.

C28-6

There are additional statements that may need to be modified when a single heavy, bi-level DMU that seats 188 passengers is compared with the two-car light DMU that seats 130. One is under Impact AQ-3 which reads, “*Since light DMUs are more fuel efficient than heavy DMUs, the light DMUs would result in a 20 percent decrease in CO<sub>2</sub> emissions compared to heavy DMUs.*” Another is under Impact E-2 which reads, “*The light DMUs consume less fuel than the heavy DMUs, so using the light DMU would increase the proposed project’s energy benefits, ...*” There may be other statements in need of revision.

C28-7

Yours truly,

Willard Richards

## **Responses to Comment Set C28**

### **Willard Richards**

- C28-1 Bi-level rail cars or a mixed fleet may be considered in the final vehicle selection process depending upon their availability and FRA approval status. See response C1-3 for information on comparing the fuel efficiency on a per-seat basis.
- C28-2 Time separation requirements for light DMUs operating with freight service are addressed in Section C.6 of the DSEIR.
- C28-3 SMART is not proposing the extension of passenger rail service into adjoining counties at this time. A discussion of the relative merits of light and heavy DMUs for such service is therefore beyond the scope of the SEIR. However, the compatibility of the SMART passenger rail vehicle with other rail lines to which the SMART project might connect in the future may be one of the criteria considered by the SMART Board in selecting the vehicle.
- C28-4 The Siemens DMU vehicle has a lower top speed of 75 mph; however, that it not necessarily reflective of the top speed for light DMUs in general. Moreover, the DSEIR notes that the light DMU has a faster acceleration rate, as noted on page C.4-1. Ride quality may vary across the two vehicle types and this type of consideration will be taken into account during the vehicle procurement process.
- C28-5 See response C1-3 for information on comparing the emissions of the different trains on a per-seat basis. Emissions are based on train-miles traveled depending on the frequency of service.
- C28-6 The comment notes that equivalent levels of CO<sub>2</sub> occur for each train option per gallon of fuel. The discussion of Impact AQ-2 in the SDEIR, as well as the 2005 DEIR and 2006 FEIR, is related to criteria pollutants (CO, ROG, NO<sub>x</sub>, and PM<sub>10</sub>). For the criteria pollutants, the emissions per gallon of fuel from the light DMU are expected to be less than those from the heavy DMU. Impact AQ-3 addresses greenhouse gases, including CO<sub>2</sub>, and concludes that the greater fuel efficiency of light DMUs would increase the beneficial greenhouse gas reduction impact of the SMART project.
- C28-7 See response C1-3 for information on comparing the fuel efficiency and emissions of the different trains on a per-seat basis. See response C28-1 regarding bi-level vehicles.

Comment Set C29  
Northwestern Pacific Railroad Company

NORTHWESTERN  
PACIFIC  
RAILROAD  
COMPANY

---

April 24, 2008

Sonoma-Marín Area Rail Transit District  
Attention: Lillian Hames  
General Manager  
750 Lindero Street, Suite 200  
San Rafael, CA 94901

Dear Ms. Hames:

Northwestern Pacific Railroad Co. (“NWP Co.”) appreciates the opportunity to comment on the SMART Draft EIR that was issued on March 10, 2008. As background information, in September 2006, NWP Co. entered into a long term Lease Agreement with the North Coast Railroad Authority (“NCRA”) to operate freight and rail passenger excursion services on the NWP rail line from Lombard to Willits. By its Decision dated September 7, 2007, the Surface Transportation Board designated NWP Co. to be the operator of common carrier freight service on that portion of the NWP Line extending from SP MP 63.4, near Lombard, to NWP MP 142.5, near Willits. Accordingly, NWP Co.’s common carrier operating rights and obligations extend on that portion of the NWP Line between Cloverdale and the Ignacio Wye over which rail commuter train service is proposed to be operated by SMART.

NWP Co.’s comments on the SMART Draft SEIR are focused on but are not limited to the assumptions used in the cumulative analysis (as described in Chapter C.6 Revised Cumulative Impacts) of the Draft SEIR.

**I. Freight/Passenger Train Operations and Separation**

In Section C.6.1 (p. C.6-2), the cumulative analysis “. . . assumes that freight trains would operate primarily during off-peak passenger service time periods, consistent with NCRA’s freight easement over SMART’s corridor, which makes freight operations subordinate to regularly scheduled passenger commute operations . . . .” This assumption is a legal conclusion that does not accurately describe NWP Co.’s legal rights to operate its trains, as provided by statute, the property easement, the Operating Agreement and its related Coordination Agreement.

C29-1

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Comment Set C29, cont.  
Northwestern Pacific Railroad Company

Lillian Hames  
April 24, 2008

Page 2

Although the legal rights of the parties provide to SMART commuter trains a reasonable meet/pass priority over NWP freight trains, and NWP Co. trains must, therefore, take the siding during a meet/pass of such trains, the several legal agreements clearly also provide that “. . . such priority shall not materially adversely affect NWP Co.’s performance of its common carrier obligations, NWP Co.’s conduct of rail freight operations, or NWP Co.’s ability to provide adequate service to shippers and receivers . . . .” as set forth in the SMART/NCRA Operating and Coordination Agreements. Accordingly, it is NWP Co.’s opinion that the underlying assumption of the Draft SEIR, namely that freight trains would operate primarily during off-peak passenger service time periods, should be corrected in the Final SEIR as freight and passenger service will operate compatibly, with neither having the right to entirely preempt any particular block of track time. Future experience over time will necessarily dictate passenger and freight usage and neither service can accurately predict a long term schedule in advance.

C29-1 cont.

The cumulative analysis also assumes that “. . . following trains, whether freight or passenger, may run no closer than 30 minutes behind their leaders . . . .”, because of both the SMART commuter train schedules and the signal system that would control all rail train movements. This is an unrealistic assumption. Modern railroad signaling systems, as simple as automatic block signal systems or as complex as centralized train control systems, readily permit following trains to operate up as close as 3 – 4 minutes behind the preceding trains, whether such trains be passenger or freight trains. Since a SMART requirement of 30-minute headways would reduce the capacity of the NWP Line to only two trains per hour in each direction, NWP Co. requests that SMART reconsider both this assumption as well as modernization to current railroad standards of the signal system that it proposes to install in the SMART Corridor.

C29-2

**II. Hours of Freight Operation and System Capacity**

In Section C.6.1 (p. C.6-2), the Draft SEIR asserts that “. . . freight train service at the levels proposed by NCRA could be accommodated on the SMART right-of-way during daytime off-peak hours without the need for night trains . . . .”

C29-3

NWP Co. understands that SMART proposes to operate 14 northbound and 14 southbound commuter trains daily on weekdays (six in the morning peak period and six in the evening peak period), and four trains northbound and four trains southbound on Saturdays and Sundays. The weekday commuter trains will operate every thirty minutes at regular intervals. Most commuter train meets will

Comment Set C29, cont.  
Northwestern Pacific Railroad Company

Lillian Hames  
April 24, 2008

Page 3

be made at stations although there are four new sidings planned north of Ignacio. On weekdays, there is one midday turn that operates from Cloverdale to San Rafael and return generally between the hours of 10:00 a.m. and 2:00 p.m. The proposed commuter schedules that were evaluated in the Draft SEIR do not now contemplate the use of non-compliant equipment that would require either a time or space separation in order to comply with FRA regulations.

C29-3 cont.

SMART's proposed freight train schedules may be unrealistic in their representation of the freight capacity that NWP Co. needs in the Ignacio to Cloverdale Corridor. As an example, in the event NWP Co. operates a solid waste train, it will be necessary to accommodate connecting train schedules with the Union Pacific. Decisions on schedules are not made unilaterally, but in the context of intra and interstate commerce over trackage owned by other lines. As a common carrier so-designated by the Surface Transportation Board, NWP Co. is obligated to operate trains at times and with the frequencies required so as to fully perform its common carrier obligations, and to conduct safe, timely, and efficient rail freight operations that provide adequate rail freight service to the shippers and receivers on the NWP Line, not all of which can be anticipated at this time. As SMART accurately points out in the Draft SEIR, NWP Co.'s common carrier status will permit it to operate trains at night, which may or may not be necessary depending on track capacity and the obligation to provide adequate service to rail customers.

C29-4

During the last 50 years, the NWP Line's infrastructure has functioned adequately as a rail freight service corridor. NWP Co. is persuaded that the NWP Line can also function effectively as a rail commuter service corridor so long as sufficient infrastructure is added to the NWP Line to accommodate the capacity requirements of the new SMART commuter service. Determining the correct amount of infrastructure in order to accommodate both services will require an ongoing degree of planning and coordination between SMART and NWP Co.

C29-5

**III. Time Separation With Light DMUs**

In Section C.6.1 (p. C. 6-2), the Draft SEIR acknowledges that "... in the event that light DMUs are used for the SMART Project, time separation would be required by the FRA . . . ." We concur with this SMART assumption. However, the Draft SEIR then further assumes that the use of Positive Train Control technology (PTC) may be approved by FRA for the use of light DMUs on single track systems that handle both passenger and freight service simultaneously, an assumption that NWP Co. believes to be unrealistically optimistic. PTC

C29-6

Comment Set C29, cont.  
Northwestern Pacific Railroad Company

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Page 4

technology has been under development for over a decade and has not yet been accepted or implemented either by the railroad industry or by its safety regulator, FRA. Without approved PTC technology, if light DMUs were selected as the SMART project vehicle, the effect would be to prevent any NWP Co. freight or excursion passenger train operations during the entire time period that SMART's rail commuter trains were actively operating on the NWP Line; thus, NWP Co.'s freight operations would necessarily be shifted largely to night operations, if this SMART scenario were implemented.

C29-6 cont.

An alternative that NWP Co. suggests for SMART's consideration would be the separation of the existing SMART Corridor into a two-track system, one of which would be dedicated to light DMU operations, and the second of which would be dedicated to NWP Co. freight and excursion passenger train operations. It is NWP Co.'s opinion that the existing right-of-way on the NWP Line is generally adequate to accommodate two separate tracks, including the required passing sidings, for both services. Advanced engineering designs in the SMART Corridor, including flyovers for the light DMU track at appropriate locations that would permit NWP Co. to access its freight customers, would permit both systems could be operated efficiently and harmoniously in the existing SMART Corridor. Moreover, rather than dismantling, removing, and then replacing the existing main track in the SMART Corridor -- as SMART proposes to do -- simply constructing a new, parallel track for use by any SMART commuter rail service while retaining the existing main track for freight service would significantly expand system track capacity in the SMART Corridor and avoid all of the costs of dismantling and removing the existing main track.

C29-7

**IV. Truck Traffic Offsets**

In Section C.6.1 (p. C. 6-3), the Draft SEIR has assumed "... an equivalency of two trucks for each rail car movement. . . ." for general merchandise premised on a further assumption that rail cars are more likely than trucks to be returned empty. For the rail freight traffic projected to be attracted by NWP Co., this assumption is simply wrong. The principal general merchandise commodities projected to be attracted by NWP Co. are grain, lumber, and aggregate inbound, and wine outbound. Outbound packaged wine is shipped in either insulated or refrigerated closed highway trucks (or railcars) that usually arrive in NWP's service territory after having been unloaded in either the Bay Area or Los Angeles; such closed trucks (or railcars) are not and would not be used to handle inbound grain, lumber, or aggregate, all of which are not compatible with wine and move only in specialized trucks (or railcars). Accordingly, the incorrect assumption contained

C29-8

Comment Set C29, cont.  
Northwestern Pacific Railroad Company

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in the Draft SEIR of “. . . an equivalency of two trucks for each rail car movement . . .” must be revised to an equivalency of four trucks for each rail car movement in order to be factually and technically correct.

C29-8 cont.

**V. Public Safety**

The SMART rail commuter service project includes a proposal to construct a bicycle/pedestrian pathway largely on its own right-of-way from Ignacio to Healdsburg and entirely on NCRA’s right-of-way between Healdsburg and Cloverdale. SMART’s Operating Plan proposes high-speed commuter passenger trains of 80 miles per hour with freight operations of 49 miles per hour in the SMART Corridor.

C29-9

The design specifications for the bicycle/pedestrian pathway set forth in SMART Drawing No. XS-001 provide for a minimum trail set-back of 15 feet and a maximum trail set-back of 40 feet between the center line of the main track and a “K” rail barrier to be constructed adjacent to the bicycle/pedestrian path. Among the two major western railroads, Union Pacific will not allow new trails on its active right-of-way and BNSF Railway requires a 100 ft. trail set-back where train speeds are in the 70 – 90 mph range, for safety reasons. The use of a 100-foot trail set-back in conjunction with SMART’s 80 mph commuter trains, such as is required by BNSF, would not be possible within the existing SMART Corridor as it generally ranges between only 60 and 80 feet in width.

According to the Draft EIR in Section C.6.5 (page C. 6-17), “. . . safety was one of the primary criteria used in planning and evaluating the proposed bicycle/pedestrian pathway . . .” The Draft SEIR then cites a report by Alta Planning+Design study as the basis for the Draft SEIR’s conclusion that the construction of the proposed bicycle/pedestrian pathway within or adjacent to the rail corridor will not adversely impact public safety. The Draft SEIR’s use of the Alta Report as rationale supporting its public safety conclusion is incomplete and perhaps misleading, as the following quotation from SMART Working Paper No. 5 demonstrates:

“The Rails to Trails Conservancy report entitled *Rails with Trails* identifies over 60 bicycle/pedestrian trails along active railroads in the U.S. The *Rails with Trails: Lessons Learned* report, prepared by Alta Transportation Consulting for FHWA and others, examines 21 of these trails on or adjacent to railroads. Of those 21, only four were along tracks with speeds in excess of 51 mph and of those four, only one was

Comment Set C29, cont.  
Northwestern Pacific Railroad Company

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actually on railroad right-of-way. That one had a minimum setback distance of 25 feet and was only one mile in length.”

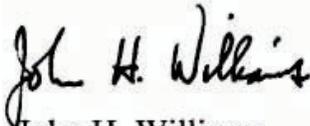
C29-9 cont.

(*SMART Working Paper #5*, October 2003, Appendix A, p. 3, Emphasis Added)

It is NWP Co.’s opinion, based on the stated policies of BNSF and UP and on our knowledge and experience, that the construction and placement of the proposed bicycle/pedestrian pathway adjacent to, without an adequate set-back from NWP’s main track, and in such close proximity to the operations of freight and 80 mph high-speed commuter service trains could very well be unsafe for pathway users and for the public. Safety could also be impacted by NWP Co.’s freight train movements and its numerous switching operations that will be within, across, or in close proximity to the proposed bicycle/pedestrian pathway. NWP Co. recommends, therefore, that the Final SEIR take into account the experience of other freight and passenger railroads in assessing safety issues related to bicycle/pedestrian proximity to active tracks.

Thank you for the opportunity to comment on SMART’s Draft SEIR. Please let me know if there are questions.

Sincerely,



John H. Williams  
President

JHW/ja

cc: Doug Bosco  
Mitch Stogner  
Allan Hemphill

## **Responses to Comment Set C29**

### **Northwestern Pacific Railroad Company**

C29-1 The statement in the DSEIR is based on the freight easements granted to NCRA over the rail line owned by SMART south of Healdsburg. As noted in Section B.3 on pages B-20 and B-21 of the DSEIR, these easements provide, without qualification, that “freight operations shall be subordinate to regularly scheduled passenger commute operations....” The assumption made in the DSEIR that freight service can be accommodated on the SMART right-of-way during daytime off-peak hours is thus a reasonable assumption based on the rights granted to NCRA in the easements themselves. The details of how these operations will be accommodated will be worked out in the future through the negotiation of the Operating and Coordination Agreements.

SMART’s intent to operate passenger rail service at 30 minute headways along the NWP during the peak periods is not a new proposal. It was described in Working Paper 5, Detailed Project Design Options, Volume 1 as early as October 2003. These route frequencies were included in the Project Description for the proposed project in the 2005 DEIR and the 2006 FEIR. The owner of the freight easement, NCRA, had the opportunity to submit comments on the 2005 DEIR, and did not raise any concerns regarding SMART’s proposed regularly scheduled passenger service. SMART is committed to providing an alternative to the single passenger automobile along the Highway 101 Corridor. Schedule reliability and predictability are key to providing successful transit services, including rail, and are central to SMART’s mission as defined in AB 2224.

In working with NCRA and NCRA’s freight operator regarding scheduling of both passenger and freight operations, SMART will be bound by its statutory obligation to work in harmony to achieve safe, efficient, and compatible operations of both passenger and freight rail service on the NWP.

C29-2 The statement in the DSEIR is based on SMART’s proposed project, which assumes regularly scheduled passenger service at 30-minute headways. This is the project that was analyzed in the FEIR certified in 2006; no changes in the operating schedule were proposed for purposes of the Supplemental EIR. As noted in response C29-1, the details of how freight and passenger operations will be coordinated will be worked out in the future through the negotiation of the Operating and Coordination Agreements; however, SMART is committed to providing 30-minute headways during the peak commute periods.

C29-3 The proposed passenger service analyzed in the 2006 FEIR assumed the use of heavy diesel multiple units (DMUs). The DSEIR also analyzes the use of light DMUs as an alternative to heavy DMUs, including the possibility of time separation. As noted in DSEIR Section C.6.5.1, if light DMU vehicles were selected for the proposed project, the midday SMART train would most likely need to be eliminated to achieve sufficient time separation and allow time for midday freight services between the SMART morning and evening peak periods. (The proposed midday train would operate from Cloverdale to Larkspur, not San Rafael, as stated in the comment.) No final decision regarding vehicle selection has been made.

C29-4 Comment noted. SMART is not proposing freight train schedules, as implied in the comment, nor have any specific schedules yet been proposed or adopted by NCRA or its operator. Rather, SMART’s EIR consultants have made reasonable assumptions regarding freight service for purposes of environmental analysis, based on the underlying freight easement on the SMART right-of-way, which requires freight operations to be subordinate to regularly scheduled passenger commute operations, and available information regarding NCRA’s proposed

- project. It should be noted that because SMART does not propose use of the Schellville-Lombard segment of the NWP for passenger services as part of the proposed project, that segment would be available to the freight operator for holding trains to allow flexibility in accessing the Union Pacific mainline. As noted in response C29-1, the details of how these operations will be coordinated will be worked out in the future through the negotiation of the Operating and Coordination Agreements.
- C29-5 Comment noted. SMART's 2005 DEIR and 2006 FEIR identified the infrastructure improvements necessary for passenger rail service on the NWP assuming concurrent freight operations. SMART will continue to work with NCRA and its approved operator regarding planning and coordination of passenger and freight operations.
- C29-6 As noted in the assumptions on page C.6-2 of the DSEIR, the use of positive train control (PTC) as an alternative to strict time separation has not been approved by the FRA and accordingly, the cumulative analysis does *not* assume development of this operations control system. However, for informational purposes, the DSEIR addresses qualitatively the potential impacts of operating light DMUs concurrently with freight trains with time separation or PTC. Contrary to the comment, freight operations would *not* need to be shifted largely to night operations if SMART selects a light DMU; rather the DSEIR notes at page C.6-18 that SMART's midday train would most likely be eliminated to achieve sufficient time separation and allow time for midday freight services between the SMART morning and evening peak periods.
- C29-7 SMART's function is to own, operate, manage and maintain a passenger rail system within Sonoma and Marin Counties, including an ancillary bicycle/pedestrian pathway to provide connections between and access to passenger rail stations. Although SMART is directed by AB 2224 to work compatibly with NCRA, this cooperative effort does not extend to acquiring and building a second rail line to accommodate freight operations and/or implementation of the costly flyovers noted in the comment. If NCRA or its operator acquires sufficient funding to make a second rail line realistic, a proposal should be presented to the SMART Board for its consideration. In any case, a second rail line is not necessary to accommodate freight operations during daytime hours if the light DMU is selected as the passenger rail vehicle; see response C29-6.
- C29-8 Comment noted. The assumption cited on page C.6-3 notes that for general merchandise, a railcar can carry the equivalent of four truckloads. However, the DSEIR then very conservatively assumes that railcars are more likely to be returned empty and therefore assumes only two truckloads displaced per railcar. If, as noted in the comment, railcars were fully loaded in both directions, then twice as many truck trips would be removed from the highways than assumed in the DSEIR, resulting in an even greater benefit to the area in terms of air quality, reduced energy consumption, and highway congestion relief than concluded in the DSEIR analysis.
- C29-9 This comment addresses the analysis in SMART's prior certified EIR and is not a comment on the current DSEIR, which is limited to evaluating certain project revisions and changed circumstances. The comment fails to acknowledge the safety structure that will be built by SMART between the rail tracks and the bicycle/pedestrian pathway. That structure will be designed to accommodate appropriate pathway setbacks and train speeds and will be subject to review and approval by the California Public Utilities Commission. Please note that the California Public Utilities Commission commented on SMART's 2005 DEIR, including the analysis of the bicycle/pedestrian pathway, and did not raise a significant safety concern. Further, the construction of a pathway linking SMART passenger rail stations includes both

Class I (on the right-of-way) and Class II pathway facilities (parallel to the rail right-of-way). As noted in the 2006 FEIR, where portions of the pathway cannot feasibly be located on the SMART right-of-way due to safety concerns, Class II segments are recommended.

These proposed setbacks exceed the minimum requirements as established by the California Public Utilities Commission (CPUC). Minimum statutory side clearance to structures or fencing is 8.5 feet from track centerline, per CPUC General Order No. 26.C. The CPUC must approve all setbacks and proposed safety structures for the bicycle/pedestrian pathway along the NWP corridor. To further improve safety and minimize the need for safety structures, the proposed project incorporates wider setbacks along some segments of the corridor. Where wider setbacks are feasible (along approximately seven miles of the corridor), a minimal fence, vegetation or similar structure would be allowed.

As of the 2004, there were over 80 bicycle/pedestrian pathways adjacent to operating rail lines in the United States, with 40 more in the planning stages. (See *Rails With Trails: Lessons Learned*, prepared by Alta Planning + Design for U.S. Dept. of Transportation, 2002; *Rails with Trails: Design, Management, and Operating Characteristics of 61 Trails Along Active Rail Lines*, Rails to Trails Conservancy, 2000). In California, bicycle/pedestrian pathways approved by the CPUC adjacent to active rail lines include the Shoreline Trail (Union Pacific Railroad) in Pinole, Davis-Sacramento Bike Path (Union Pacific Railroad/Amtrak/Capitol Corridor), San Fernando Bike Path (UPRR/Amtrak/MetroLink), Irvine Bike Path (BNSF/Amtrak/MetroLink), and many others. All of these referenced pathways have train operating speeds over 50 mph, and setbacks of 25 feet or less from the track centerline for portions of the trail.

Comment Set D  
Public Meeting Testimony, 4/9/08

S M A R T  
SONOMA-MARIN AREA RAIL TRANSIT  
DRAFT SUPPLEMENTAL  
ENVIRONMENTAL IMPACT REPORT  
PUBLIC MEETING  
APRIL 9, 2008  
PUBLIC TESTIMONY

1 **D1 Susan Ristow**

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MS. RISTOW: Good evening. My name is Susan Ristow. As a resident of Novato for over 25 years, I would like to better understand what the cumulative impacts of freight and passenger rail would be in our community. You've said that 60-car long freight trains may delay traffic at the at-grade crossings for three minutes for trains traveling 20 miles per hour. In downtown Novato, the crossings at both Olive and Grant are within a few hundred yards of each other. Could both of these arteries be blocked simultaneously? What would these delays mean to emergency services if a long freight train is stalled at intersections? Which neighborhoods would be impacted by reduced emergency services? For instance, how would Trader Joes and Whole Foods markets be affected?

According to the Draft SEIR, nighttime freight operations could occur because the freight operator can run freight trains at night for their own operational needs. The question is can SMART legally control the dispatch of trains at night?

You've talked about quiet zones and your willingness to work with cities to establish them, but you don't discuss the cost nor if there have been evaluations done to determine the cost. For residents in Northern Novato, how much difference would quiet zones make given the other noises emanating from freight trains? What are the requirements to qualify for a quiet zone especially in high-density neighborhoods near the tracks like Olive, Railroad, and Grant Avenues?

There are parks used by children, Slade Park and the Olive Tot Lot, which are close to pedestrian at-grade crossings. How would they be impacted by freight trains operating in the vicinity? How many residences will be impacted at night in neighborhoods near the tracks, for instance, along Manuel Drive, Lamont, and other streets?

There are motels in Northern Novato, such as the Travel Lodge just north of an at-grade crossing at Rush Creek Place. How would freight operations including train horns and other noises at night affect their guests? Have they and other impacted businesses been contacted?

Would diesel exhaust accumulate in nearby residences and businesses?

The Novato Community Hospital is virtually adjacent to the tracks. How would nighttime noise and vibrations affect their operations and their patients?

The NCRA has a long history of spilling toxins in the vicinity of the tracks. Given this, will SMART have any authority, through operating or other legally

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D1-8

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1	binding agreements, to ensure that NCRA operates in a responsible fashion? We look	D1-8 cont.
2	forward to your answer to these questions. Thank you.	
3		
4	<b>D2 Karen Nygren</b>	
5		
6	MS. NYGREN: I'm speaking tonight for the Sierra Club Marin Group.	D2-1
7	Some of the questions they've asked were why is there no mention of biodiesel fuel in	
8	this Draft Supplemental Environmental Impact Report while in the 2006 EIR it was	
9	discussed significantly and was talked about as a superior alternative?	
10	Why is there no cumulative discussion between the expansion of	D2-2
11	passenger service? Right now it only it only talks about the start-up service and the	
12	impacts of the ability to function with a freight service in the start-up or expanded	
13	scenario. The 2006 EIR does mention that this is only SMART start-up service, and thus,	
14	there will be an expanded service and the EIR does not get into any discussion of that.	
15	Why is there no discussion of what will happen to the ridership numbers	D2-3
16	and the impacts to passenger service if midday trains do not operate? What are the costs	
17	the impacts to the whole SMART service in itself? One hundred thirty passengers is the	
18	capacity of the light DMU, and why is there no discussion of the interior configuration of	D2-4
19	what the light DMU would be and what would that do with the capacity of the ridership	
20	numbers within the car?	
21	Two hundred fifty people were mentioned to be boarding riders at	D2-5
22	Hamilton station, but why is there is no breakdown between how many would board and	
23	how many would alight. How many residents versus how many commuters will get in	
24	and out of the cars at that station like a ridership forecast.	
25	Why is the weekend train service had no travel to demand forecasting	D2-6
26	study as was done in the 2006 EIR, so that one could really do a true comparison between	
27	the 2006 EIR, as was done previously, versus just pick and choose a percentage from	
28	what is previously done?	
29	This is just in response to many people who have talked about noise. And	D2-7
30	I'd like to know what it would be like to look at the noise spikes of this train going by	
31	versus how they have, in the DEIR or the Supplemental EIR also, averaged the noise over	
32	a period of time. And I think if you look at the noise level of a train going by at a	
33	specific moment, it creates a spike and then it goes down versus what the average of the	
34	train noise would be. I think it would be good if we could have that determination of the	
35	difference of the sound related to the spikes versus the average during day and night.	
36	Thank you.	
37		
38	<b>D3 Erica Lowe</b>	
39		
40	MS. LOWE: Hi. I'm Erica Lowe. I live in Hamilton, and I have a couple	D3-1
41	questions. One is just a question of, in the interest of global warming and going green,	
42	have you considered, I don't know you may have considered this, something such as	

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1	electric but isn't diesel, something that's like a 20 <sup>th</sup> century solution for a 20 <sup>th</sup> century	D3-1 cont.
2	problem?	
3	Another thing is the ridership for Hamilton was the highest of all of the	D3-2
4	different stations, and I couldn't understand what that was based on. Maybe it's further	
5	explained, but I just didn't understand why the numbers were so high.	
6	And then one other question I have is the nighttime train noise. As far as I	D3-3
7	can remember about trains when I was a kid is the train sounds their horns when they	
8	come to an intersection, if that's what I remember correctly, to kind of announce that	
9	they're coming because of the danger of a coming train. And I just noticed that a lot of	
10	the intersections that the train will be, you know, it's close to residences, so I don't see	
11	how they're going to get through those intersections at nighttime, either freight, without	
12	sounding their horn just for safety purposes, and so I have a big concern about that, so if	
13	you could address somewhere in the, you know, noise mitigation.	
14	And then I still want to talk about freight. The information on the -- kind	D3-4
15	of the 30 feet from the track or 50 feet from the track or 100 feet from the track that the	
16	pollution and the noise, I just -- it's some -- I don't know how you measured it, but you	
17	said that there was no substantial or significant impact. I don't know what that would be	
18	because when I'm close to trains, you know, they're just noisy and dirty. They just are,	
19	so I just wanted to say that. And just in your summary report and maybe I haven't gone	
20	into detail of how you determine that seemed -- I just wasn't sure that that was -- it didn't	
21	sound reasonable to me, and let me just say it that way. That's all I have to say. Thanks.	
22		
23	<b>D4 David Schonbrunn</b>	
24		
25	MR. SCHONBRUNN: Good evening. David Schonbrunn with	
26	TRANSDEF. Having been involved with this project for close to 20 years now, I am	
27	very pleased to say that I thought the SEIR did a strikingly good job of differentiating the	
28	issues of the different agencies and the different EIRs that are in play right now and in	
29	particular clarified which cumulative impacts are actually relevant to SMART's EIR, and	
30	that has to be the foundation of what we're doing.	
31	Unlike San Rafael, Novato has not done the planning work that would	D4-1
32	enable high quality connections between bus and rail. Now this kind of planning is	
33	underway by TAM at this current time. It's outside the scope of this SEIR. It is	
34	something that is definitely needed in the future. I took a look around and the most	
35	obviously place for a downtown station has already been occupied by Trader Joe's, so	
36	there's incomplete planning going on in this city.	
37	Opposition to SMART has often flown in environmental banter. This	D4-2
38	SEIR shows that there's no basis for opposing SMART on environmental grounds.	
39	When opponents of rail talk about simple truth, they're just plain lying. A lot has been	
40	said about how freight impacts the SMART project. This EIR shows that talk was a lot	
41	of hot air. There's no beef here. Despite a desperate attempt to enflame the public,	
42	there's nothing in this SEIR to indicate any environmental problems, only environmental	
43	benefits from SMART. And there's not much in the way of problems that will turn up in	

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1	NCRA's EIR for the Russian River Division either. So all the noise that people are going	D4-2 cont.
2	to be hearing and it's going to be unrelenting, I guess, is going to be about projects that	
3	are much further down the road, and they will never be before your agency. Speaking as	
4	one who is eager to start receiving the environmental benefits of the SMART project, I	
5	am pleased to find the SEIR adequate. Thank you.	
6		
7	<b>D5 Peter Theran</b>	
8		
9	MR. THERAN: Good evening, Board Members and Mayor Boro. Much	D5-1
10	of what I was going to say has been said. I do have some questions, though, about is it	
11	assumed when talking about environmental benefits cumulatively that all of the material	
12	carried by train are now being carried by truck or can be carried by truck, whether that's	
13	true or not, or are there some materials that can only be moved if there's a train	
14	available?	
15	I have a question about are there any plans for passbys where a parallel	D5-2
16	track will be used to allow another train to pass by, and if so, how many and where will	
17	they be located? And is it measured in this SEIR the impact of idling cars at railroad	D5-3
18	crossings? Has that been addressed? And I apologized for not having read it in detail to	
19	be able to answer that question myself, but I only have three minutes so I won't take	
20	more than three minutes anyway.	
21	And the impact of -- The cumulative impact of diesel exhaust on specific	D5-4
22	neighborhoods? There are clearly some and they were identified here this evening, some	
23	neighborhoods in Novato where the tracks are really close to neighborhoods. One was	
24	mentioned on Olive, clearly through the center across Grant, and then when the train	
25	crosses underneath Highway 101 and there's a passenger cross by there -- a signal	
26	passenger cross by, the tracks then run very close to a whole series of homes in that	
27	neighborhood. And so has the cumulative impact on that neighborhood specifically with	
28	noise and vibrations and impacts on diesel exhaust been looked at?	
29	And the question I had relates to the margin of error of the projection of	D5-5
30	ridership, and I -- Maybe just because I didn't scrutinize in sufficient detail, but I wasn't	
31	able to find that. And it seems to be a requirement in order to interpret what a one	
32	percent or two percent drop in vehicles on the highway means. Is it significant or is it not	
33	significant? So my question is, margin of error and be able to judge less significant or	
34	not. Thank you.	
35		
36	<b>D6 Jerry Peters</b>	
37		
38	MR. PETERS: My name is Jerry Peters. I am a resident of Novato for the	D6-1
39	last 30-plus years. I have looked into the SEIR. I find it's a wonderful document. I give	
40	it a good kiss each night when I go to bed. I think someone said awhile back that the	
41	definition of bureaucracy is when the process is more important and the results are not.	
42	There's a lot of calls been made for more detail, and more detail, and detail. And tonight	
43	whoever's been here for 125 years, every year that we wait it costs us taxpayers and	

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1 future users more money. I appreciate your attention and I hope you get through this  
2 process and get the results.

D6-1 cont.

3  
4 **D7 Geoff Adams**

5  
6 MR. ADAMS: Hi. My name is Geoff Adams and I'm a San Rafael  
7 resident. And my question has to do with the cumulative impacts with the NCRA freight.  
8 There was the proposed scenario and then the two speculative ones. And if the proposed  
9 scenario is the subject of their EIR, then in the future if they were to want to increase the  
10 freight to either one of those speculative scenarios, my question is would then they have  
11 to do further environmental review at that point to go beyond the proposed level?  
12 Thanks.

D7-1

13  
14 **D8 John Diamante**

15  
16 MR. DIAMANTE: Good evening. John Diamante, Threshold  
17 Environmental Center. The comments that there's actually no issue that's been raised by  
18 the EIR or the Supplemental EIR, no substantive issue not previously raised by this  
19 community and all communities on the line, and long study processes of the 1980s and  
20 1990s, and those were processes that mandated this railroad for all of us, and the mandate  
21 was for the public convenience and necessity. So though one can spin, and churn and  
22 drag these issues back in different formats and different fora and different processes, such  
23 as EIRs and so forth on various nits and so forth, delay in the railroad really becomes  
24 something of a public nuisance. Many of these issues raised are as a result of the railroad  
25 not running for a good many years. This railroad is known as a once and future state-of-  
26 the-art railroad. This railroad wasn't built by people taking time out from the ranches  
27 and farms of Novato, Upper Marin, and Lower Sonoma. This railroad was built by  
28 people who had stand in the Continental United States to link the city and the river. This  
29 railroad in its day was a technological pioneer. On this railroad, for instance, was  
30 developed the block signaling technique that allows trains to operate so safely. That  
31 technique enabled the New York City subways underground in the dark to operate safely.  
32 So when we talk of diesel, not even biodiesel, and vibration and all these things, we're a  
33 century -- 125 years ago. This is our railroad. And to impede it, to delay it, really delays  
34 the best technology for our future. The future needs us. We need the future and this  
35 railroad in this corridor is the path to it, so I always come to these processes. I do read  
36 these EIRs. I scan them very closely, every footnote, looking for new material. But  
37 really all communities and all parties for 22 years have pretty much signed off on this  
38 railroad, and the people are the same faces who come with the same objections are taking  
39 valuable time and holding up a valuable public process keeping this wedded to the  
40 pollution and noise of the automotive dependence. They're not even back to the future.  
41 They're just back and back, so let's catch up. Let's support this most recent entity,  
42 SMART, and go forward with it and build its constituency, and take the objectors and the  
43 economists, who don't understand the region and other self-styled preachers aside, and

D8-1

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1 try and make sure they've done their homework and read the literature and read the  
2 processes and the studies and catch up with us. Thanks for your time.

D8-1 cont.

3  
4 **D9 Lionel Gambill**

5  
6 MR. GAMBILL: Good evening. I'm Lionel Gambill, 650 Sunset  
7 Parkway, Novato. In the limited time that I -- I could talk for hours about what's good in  
8 this SEIR, so I'll try in this brief time to say a few things that I think could improve it.

9 In section C.4, I suggest that you use comparable units of measure. Just as  
10 an example, suppose you were comparing prices of two different size jars of peanut  
11 butter. You wouldn't compare price per jar. If you wanted to get your money's worth,  
12 you would be more likely to compare price per ounce of net weight. But in C.4, that kind  
13 of unit of measure is not used. For example, standard railroad practice, if you're talking  
14 let's say about capital costs, you talk about capital cost per passenger seat. On a freight  
15 train it would be capital cost per time mile. If you're talking impacts, if you're talking  
16 operating or maintenance costs, cost per passenger mile or per seat mile. It's the only  
17 way you can get a meaningful comparison. And it's not that the information in C.4 is  
18 bad. It's that we don't know because there isn't that degree of specificity.

D9-1

19 I think -- Well, just as a couple of examples, I'll go into measurements  
20 that go beyond the EIR capital costs. The capital cost per seat for the light rail vehicle  
21 that's being considered is \$30,000. The capital cost per seat of Colorado railcar, double-  
22 deck, two-car unit, one car and one unpowered, is \$17,000 per passenger seat. There are  
23 many ways that this could be improved, length of train, the number of seats that will fit  
24 between Third and Fourth Streets in San Rafael. That's a significant piece of information  
25 for SMART. The fact is using double-deck, FRA compliant, DMU railcars you could get  
26 594 seats between Third and Fourth Streets compared to a maximum of I think it's 238  
27 for the light rail vehicle. I'm asking to raise the level of specificity there and I think that  
28 would greatly improve and will give us more information to look at. Thank you.

29 I just want to take advantage of chance to put in a thought for our Grand Tours of  
30 Bay Area Rail and Ferry Services because so much of this in the abstract. And when  
31 people actually ride these trains -- Director Breen, in fact, did so much he rode a second  
32 time. People have a wonderful time. We cannot proselytize. We let the experience  
33 speak for itself. Our next Grand Tour of Bay Area Rail and Ferry Service is on 5/14. We  
34 leave from Larkspur Ferry terminal in the morning. The price includes the lunch at  
35 Scott's Seafood. It's just a wonderful day, and we invite everyone (inaudible). We will  
36 have a tour on May 14<sup>th</sup>.

37  
38 **D10 Dr. Alan Berson**

39  
40 DR. BERSON: Good evening. Thank you very much for your work and  
41 the Supplemental EIR, which is very good in many respects, and that's before the other  
42 shoe drops. I have six issues that I want to bring to your attention not in any detail  
43 obviously.

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1	First of all, I think regarding the freight, it's unrealistic to believe that or	
2	even to speculate that there will be no freight that will have to go at night. When one	D10-1
3	accounts for what your own predictions are for increase in the SMART service, that just	
4	doesn't seem possible that one would be able to integrate freight during the daytime.	
5	Secondly, diesel fumes and health, which has been one of my career areas,	
6	it seems to me to be a very sort of a cavalier kind of a description that was given of the	D10-2
7	diesels and cancer. There are all sorts of risks, cardiovascular, pulmonary, and cancer	
8	risks, that I don't think have been handled properly.	
9	The issue of electric trains, which was brought up previously, light rail,	
10	it's very confusing to me in reading this report, the original, and the draft, as to how	D10-3
11	electric trains appear not to have taken any -- been considered much more than they have	
12	been, and I suspect it has to do with the freight.	
13	Hamilton station seems to have been a -- loomed large in the Draft EIR. I	
14	don't know why. Numbers were given, for example, a ridership between the, thank you,	D10-4
15	between Hamilton station and other stations. All these numbers are so far down in the	
16	noise level that I don't understand how anyone can consider them reliable. How can one	
17	predict in 20 years from now numbers like 200 and compare them with 180 or 160?	
18	A question for you folks is, is the SMART group going to do, as I've	
19	heard them say in previous meetings, going to accept the city's views and	D10-5
20	recommendations with regard to station location?	
21	And my final point is the greatest advantage it seems to me in having a	
22	train service is reducing the amount of traffic on the roads, automobile traffic. I don't see	D10-6
23	that this Draft EIR is any better, the Supplemental rather, than the original EIR in	
24	demonstrating that. Thank you.	
25		
26	<b>D11 Debbie Butler</b>	
27		
28	MS. BUTLER: Yes. Debbie Butler. I live on Marblehead Lane, which is	
29	the street that looks right onto the station. I'll be speaking to the Hamilton station.	
30	My concern here tonight is, not only that it's in my backyard, this station,	
31	the Hamilton station, but the main concern is the safety of the children who are being	D11-1
32	educated and living in Hamilton itself. We have three schools in Hamilton, but I only	
33	have read in your materials about one school, the Novato Charter School. The other two	
34	-- The other two are Hamilton Elementary with an enrollment of 500 children and Nexus	
35	Academy with an enrollment of 30, which is right next to the charter school. You also	
36	have the daycare facility there as well. I have two children that attend Hamilton	
37	Elementary. They ride their bikes every day to school. My concern is their safety.	
38	Outside of the location of the charter school and Nexus, which are very close to the	
39	tracks, many students from these three schools travel by bike or walk to and from school	
40	every day. You have indicated in your 2005 Draft EIR about sponsoring an in-school	
41	education class to educate students about safety and hazards around railroad property, but	
42	I haven't seen anything addressed beyond that. I don't believe you have even talked to	
43	the neighboring schools, the principals at these schools, or even the school district, which	

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1 happens to be right where we are today, and I just happen to be a trustee on that school  
2 board. So it is a very high concern of mine that the safety of our children is looked at  
3 before we go beyond this.

D11-1 cont.

4 I do oppose the SMART train. I hope to change my mind on that. I don't  
5 know if that will be the case. It, again, being in my backyard I have -- the noise is a big  
6 issue of mine. I see that you have some boundaries of shrubbery or whatever where we  
7 won't be able to see it, but right now I hear the freeway from my house. With the  
8 windows closed and everything closed during the day, I hear the freeway. I know we  
9 took a gamble on living there because it was in Hamilton Master Plan, but I would like to  
10 see more information and more detail in the noise factor. I just am not 100 percent  
11 comfortable with that right now. And I hope to again support it in the future, but at this  
12 point I cannot. Thank you.

D11-2

13  
14 **D12 Sharon Stammer**

15  
16 MS. STAMMLER: My name is Sharon Stammer. I'm a Novato resident.  
17 I want to really say how important it is to get all the information from the EIR and then  
18 this, the Supplemental, too. We get a lot of flack about how we're delaying things, but  
19 when it comes to people's lives, I think it's important we get it right. One of the things I  
20 mentioned earlier at another meeting was that we are now dealing with tobacco  
21 companies that our government can't close them down even though it's been proven that  
22 it's very environmentally unsafe to be around tobacco smoke and how dangerous it is to  
23 everybody's life; the millions of people that die a year around the whole world. We can't  
24 stop it. It's already there. Nobody wants to yank it out, and have people be poor and not  
25 have jobs. So this is one time we can go ahead and examine it very carefully before we  
26 go ahead and do something and then later on we say, 'Oh, no. That's a lot louder or more  
27 dangerous than we thought.' We're not going to be able to pull out then, so be patient  
28 with us when we're asking for you to give us this information. It's very important.

D12-1

29 I would assume that this room is probably 50 feet and there's no way  
30 twice or three times the size of this room that you had a train horn going off that you  
31 could say it's insignificant noise. I don't live as close as the lady that was here earlier,  
32 but I'm probably 150 feet away. The Skateboard Park in Hamilton is right next to the  
33 railroad tracks. I hear the skateboard. You can't convince me that a train is going to be  
34 quieter than a skateboard going up and down the ramp, so I'd just like you to be a little  
35 patient and please bear with us and give us the information we want. Thank you.

36  
37 **D13 Steve Birdlebough**

38  
39 MR. BIRDLEBOUGH: Thank you, Mr. Chairman and Members. Steve  
40 Birdlebough with Friends of SMART. I want to address two issues. One is the  
41 assumption having to do with headways for freight, and the second has to do with the  
42 advantages or disadvantages of light versus heavy railcars. I'm aware that headways  
43 depend a lot on signaling, and the assumption is that because SMART is going to be

D13-1

Comment Set D, cont.  
Public Meeting Testimony, 4/9/08

1 operating at 30-minute headways that the signaling would be based on that. But I would  
2 like to see what would happen if we assume 15-minute headways in terms of how many  
3 freight trains would be able to operate during the daytime. I realize that we're entirely in  
4 the area of the second and third degree of speculation and that that's a lot of work to put  
5 you to, but I think, given that we operate quite a few trains at three and five-minute  
6 headways, that it makes sense to look at the question of 15-minute headways.  
7 The second issue that I'd like to talk to is the difference between light and  
8 heavy DMUs, and I notice that the variation in energy savings has quite a range. It  
9 ranges from the possibility of a one percent improvement to a twenty percent  
10 improvement. And I'd like to see if there isn't some way that we can shave that down a  
11 little bit and get a sense of how likely it is to be at the one percent end and at the twenty  
12 percent end. And I would also like to see how that would be impacted by the question of  
13 how many riders the light DMU versus the heavy would attract. I've ridden both. I find  
14 them both to have good rides, but I've not been able to ride the light at 75 miles an hour.  
15 And my question is, if you sacrifice ridership as a result of a less desirable ride and we  
16 see that the ferry, for example, attracts people away from buses because of the quality of  
17 ride, you may end up with less gain from a light railcar than you have from a heavy  
18 railcar, and I'd like to see some analysis of that. Thank you.  
19  
20 **D14 Chrissy Theran**  
21  
22 MS. THERAN: Good evening. I have one question and one question  
23 only. When we were together in the past, it came up about a demonstration of the horn  
24 blowing, and so I'd like to ask SMART if they would in fact encourage a demonstration  
25 for more than one day of the horn blowing at the various 61 crossings. Thank you.  
26  
27 **D15 Candace Clark**  
28  
29 MS. CLARK: This is going to be very short. Okay. I wasn't planning to  
30 talk at all. My name is Candace Clark and I live in Contempo Marin in San Rafael, and  
31 my sister lives also in Contempo Marin in San Rafael, and she lives approximately, I  
32 guess, maybe it is 30 feet from the middle of the track. And since I have experienced her  
33 house and experienced being there and can't imagine a train coming by at 75 miles an  
34 hour, we're going to hang on to the furniture, you know. So I mean that's my -- that's  
35 my concern is that I want to make sure that when we have these, you know, the EIR, and  
36 we're saying negligible, I mean have you been there because that's real important to just  
37 walk the track and see what would happen. Thanks.  
38  
39  
40

D13-1 cont.

D13-2

D13-3

D14-1

D15-1

## **Responses to Comment Set D** **Public Meeting Testimony, 4/9/08**

### **Comment Set D1 - Susan Ristow**

- D1-1 See response C27-3.
- D1-2 See response C27-4.
- D1-3 See response C27-5.
- D1-4 See response C27-6.
- D1-5 See response C27-7.
- D1-6 See response C27-8.
- D1-7 See response C27-11
- D1-8 See response C27-12.

### **Comment Set D2 - Karen Nygren, Sierra Club, Marin Group**

- D2-1 See response B1-8.
- D2-2 See responses A1-2 and B1-24.
- D2-3 See response B1-7.
- D2-4 See response B1-3.
- D2-5 See responses B1-29 and B3-22, as well as Master Response 3.
- D2-6 See response B1-14.
- D2-7 Short-term noise fluctuations are captured in the Leq and Ldn thresholds of significance, especially in the significant impact due to train horn noise (Impact N-5). See also response B1-41.

### **Comment Set D3 - Erica Lowe**

- D3-1 See response C22-1.
- D3-2 See Master Response 3 and response B3-22. D5-1 See responses A3-3, B2-39, and B3-14.
- D3-3 See Master Response 5 regarding train horn noise mitigation.
- D3-4 The DSEIR (Section C.6.3.1) explains new regulations which would substantially reduce freight locomotive emissions. The DSEIR fully discloses both air quality and noise impacts in Section C.6.

**Comment Set D4 - David Schonbrunn, TRANSDEF**

- D4-1 Comment noted.
- D4-2 The comment stating that the DSEIR is adequate is noted.

**Comment Set D5 - Peter Theran**

- D5-1 See response A3-3 and information in DSEIR Sections C.6.1 and C.6.2 regarding truck offset assumptions.
- D5-2 See response A1-11
- D5-3 The 2005 DEIR and 2006 FEIR addressed localized carbon monoxide (CO) from idling motor vehicles at gate crossings (Impact AQ-5). This would be a less than significant impact of the SMART project.
- D5-4 See response B3-25.
- D5-5 There is no way to calculate a margin of error in the projection of ridership — at least in the way the term is typically used in statistics and probability. In statistics and probability, this is typically expressed as there is X% confidence that the results are within plus or minus Y% of some value. That approach does not work for a ridership estimate, because there are simply too many variables that will influence what the final number is, and there are too few historical observations to base an estimate of error upon.

**Comment Set D6 - Jerry Peters**

- D6-1 The comment in support of the project is noted.

**Comment Set D7 - Geoff Adams**

- D7-1 This comment, which refers to the need for NCRA to conduct additional environmental review in the event that freight service is expanded, should be directed to NCRA. It does not apply to the SMART project or the SMART DSEIR.

**Comment Set D8 - John Diamante**

- D8-1 The comment in support of the SMART project is noted.

**Comment Set D9 - Lionel Gambill**

- D9-1 See responses 26-1 and 26-3.

**Comment Set D10 - Dr. Alan Berson**

- D10-1 The comment does not provide any documentation to support the claim that the proposed level of freight service could not be accommodated on the SMART right-of-way during daytime, non-peak hours. See also Master Response 2.
- D10-2 The overall health risks due to diesel particulate matter can be characterized using the health risk thresholds established in the 2005 DEIR and 2006 FEIR. This approach is consistent with

- direction from the applicable air quality/air pollution control districts. See also the background discussion of diesel particulate matter in the 2005 DEIR (p. 3-66).
- D10-3 SMART is not proposing an electrified rail service. At present, none of the other standard-gauge, commuter rail systems in the Bay Area are electrified, although Caltrain has plans for future electrification using overhead catenary wires. The SMART line could potentially be electrified in this way in the future. The possibility of freight rail running in the corridor poses no barrier to electrification. SMART will be evaluating all its vehicle options prior to procurement, and may consider hybrid trains or other emerging technologies.
- D10-4 Please see Master Response 3.
- D10-5 The SMART Board of Directors will make final station siting decisions with input from the City of Novato and other interested groups and citizens.
- D10-6 The comment regarding the positive impact of the SMART project on reducing vehicle traffic is noted.

**Comment Set D11 - Debbie Butler**

- D11-1 See responses A1-21 and C14-1.
- D11-2 See response C24-28. Noise impacts are fully disclosed in the DSEIR.

**Comment Set D12 - Sharon Stammler**

- D12-1 The significant unavoidable impact of train horn noise at at-grade crossings is identified in the 2005 DEIR, the 2006 FEIR, and the DSEIR (Impact N-5). See Master Response Q in the 2006 FEIR and Master Response 5 in this FSEIR regarding the designation of Quiet Zones as mitigation.

**Comment Set D13 - Steve Birdlebough, Friends of SMART**

- D13-1 See response B11-12.
- D13-2 The reported fuel efficiency is based on vendor data where available, and the data varies because of the wide ranging conditions that influence fuel efficiency and the lack of uniform fuel efficiency reporting standards.
- D13-3 The ride quality of different train types will be a factor in vehicle procurement decisions, but does not need to be evaluated per CEQA.

**Comment Set D14 - Chrissy Theran**

- D14-1 See response A1-13.

**Comment Set D15 - Candace Clark**

- D15-1 The rail line in San Rafael will not be used by freight operations, as freight service will not occur south of Highway 37. Therefore, this comment does not pertain to the issues analyzed in the SEIR. Passenger train passby noise was fully addressed in the previous 2006 certified FEIR.

Comment Set D, cont.  
Public Meeting Testimony, 4/16/08

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S M A R T  
SONOMA-MARIN AREA RAIL TRANSIT  
DRAFT SUPPLEMENTAL  
ENVIRONMENTAL IMPACT REPORT  
PUBLIC MEETING  
APRIL 16, 2008  
PUBLIC TESTIMONY

**D16 Allen Tacy**

MR. TACY: Good evening. I'm Allen Tacy from Petaluma. I wanted to address the noise element of the SEIR in two respects. One is the quiet zones. Quiet zones can be established by a local community without receiving any permission or clearance from anyone else. They do need to be coordinated with the California PUC, which has overall authority within the state, and the quiet zone requirements themselves are federally mandated by the FRA. But as long as they maintain compliance with the FRA rules, they can establish a quiet zone on their own without necessarily getting anybody else's clearance except they have to cooperate with the railroad.

D16-1

Secondly, on the freight noise or the noise of the trains, as explained, the SMART trains will not exceed the 60-decibel level, which was established in both Marin County and Sonoma County General Plans as an acceptable outdoor noise level. The freight trains, as the SEIR also explains if they are restricted to 25 miles an hour, will not exceed a 60-decibel level either. It is entirely within the police power of any community to establish speed limits on trains just as it is on automobiles. Thank you.

D16-2

**D17 Tanya Narath, Friends of SMART**

MS. NARATH: Yes. Good evening, Chairman McGlashan and Board Members. My name is Tanya Narath, T-A-N-Y-A, N, as in Nancy, A-R-A-T-H, and I'm here tonight representing the Friends of SMART. We have reviewed the Supplemental Environment Impact Report and with a few exceptions feel the report adequately addresses the project components which have changed or been added since certification of the Final EIR in 2006. The SEIR demonstrates that the recommended project improvements will have an overall positive benefit to the environment and to the quality of life for North Bay residents. Although the value of passenger rail service may be most evident during rush hours, we suggest that the report evaluate the environmental benefits achieved over the long term as the location of the SMART stations creates a market preference for city center development. This in turn discourages sprawl development and preserves our beloved open spaces in both counties. Regarding greenhouse gas reductions, the State of Oregon recently completed a meta-analysis of studies looking at the differences between mixed-use neighborhoods and low-density urban sprawl. They found that doubling

D17-1

D17-2

Comment Set D, cont.  
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1 the density, mixing uses, and improving street connectivity reduces per  
2 capita vehicle miles traveled by 33 percent.  
3 In conclusion, we commend the SMART Board for taking the  
4 inputs received after the last election and incorporating them into the  
5 proposed project. We believe SMART, with the changes outlined in the  
6 SEIR, will be the catalyst for change that will enable us to provide a  
7 viable alternative to commuters and weekend travelers suffering today  
8 from escalating gas prices and gridlock on Highway 101, transform from  
9 the expensive inefficient auto-dominated transportation system to one that  
10 seamlessly integrates pedestrian, bicycle, bus, and rail transit, and  
11 achieve our ambitious and essential goal of reducing greenhouse gas  
12 emissions by creating a healthier, more sustainable transportation system  
13 and land use framework for the North Bay region. Thank you.

D17-2 cont.

D17-3

14  
15 **D18 Kaye Karchevski**

16  
17 MS. KARCHEVSKI: Mr. Chairman and Directors, the SEIR  
18 studied 30 minimum headways of passenger and freight for assessing the  
19 cumulative impact of the freight and passenger track. Since SMART will  
20 be dispatching both the passenger and the freight, I would like the  
21 consultant, if possible, to steady headways of 15 minutes or shorter for  
22 the freight trains alone running at off-peak times; that is during the day  
23 and early evening when SMART isn't running. Recent advances in  
24 railroad signaling and control systems may make this option possible and  
25 affordable. Thank you.

D18-1

26  
27 **D19 Willard Richards**

28  
29 MR. RICHARDS: Chairman McGlashan and Board Members,  
30 my name is Willard Richards. I wish to discuss section C.4 on the light  
31 DMUs. The previous EIR considered only heavy DMUs and this one  
32 includes the discussion of light DMUs, which expands in a good way, but  
33 I think the pendulum has swung too far. I don't want to get into vehicle  
34 selection issues, but I would like to address issues that might  
35 unnecessarily bias the options for vehicle selection. The light DMU --  
36 There's a statement, 'light DMUs being considered for the SMART Project  
37 has a larger capacity of 130 compared to 90 for heavy DMUs.' The  
38 Colorado Railcar has a single car, double-level DMU that's heavy but  
39 carries 180 passengers, and if you put two of those together, that's 360  
40 passengers in one train. Because of the fact that you've got many more  
41 passengers in one vehicle, you then have the advantages for weight per  
42 seat, emissions per seat, et cetera, with the heavy DMU. There's a  
43 statement, 'The use of light DMUs would reduce emissions from the  
44 proposed SMART Project.' Well, that -- It just said that it might be a  
45 heavy DMU. If you use the double level, it might be better. And there's  
46 the statement, 'Lower amounts of emissions of each pollutant per gallon  
47 of diesel burned from a light the DMUs.' Well, the per gallon you get the  
48 same amount of CO2 whether it's a light or heavy DMU. And for the

D19-1

D19-2

Comment Set D, cont.  
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1	other pollutants, it depends on the exhaust after treatment, so whether it's	D19-2 cont.
2	heavy or light doesn't influence that statement. I'll turn in a written	
3	comment so your EIR authors can correct that.	
4	The emissions depend on the after treatment, and the after	D19-3
5	treatment for SMART vehicles by law will be very good. And tests of	
6	prototype engines have shown that the emissions can be a factor at five to	
7	twenty (inaudible) standards. And so the things that you've been hearing	
8	recently about the health effects of diesel particles, and oh they're awful,	D19-4
9	is on the strongest arguments there is in favor of SMART. Getting people	
10	out of automobiles on to SMART reduces the emissions of those particles	
11	that people are worried about. And so having all of that whoopla about	
12	those health effects is very much in our favor.	D19-4
13	One last thing, by using heavy DMUs, we don't tie ourselves	
14	should SMART expand service to east or to the north that provides more	
15	flexibility. It would be appropriate to mention that in the EIR. Thank	D19-4
16	you.	
17		
18	<b>D20 Jack Swearingen</b>	D19-4
19		
20		
21	MR. SWEARENGEN: Good evening, Chairman and	D19-4
22	Members. I want to discuss briefly two of the issues before us. One is	
23	weekend passenger service and the other is light DMUs.	
24	Let me do the second one first since Willard introduced it. I	
25	think it would be good for the SEIR to not say it's either heavy or light	D20-1
26	DMUs because advancing technology may be commercially ready when	
27	the DMUs are ready for overhaul or replacement and possibly even by the	
28	time the rolling stock RFQ is issued. The FRA compliance of these	
29	alternative technologies is not in hand yet, but neither is it for the light	
30	DMUs. I'm referring to the hydrogen fuel cell trains that have been tested	
31	in Japan by Japan Railway East, and the rail powered, diesel-electric	
32	hybrid, freight-shuttling locomotive that's being operated by Union	
33	Pacific and Canadian Pacific. Thirdly, in the UK, a new hybrid train --	
34	passenger train is being tested now. It is battery-assisted diesel electric.	
35	Likewise, a battery-assisted diesel electric is being operated in Japan on	
36	the JR East Railway, and finally, a French hybrid, which is a diesel	
37	electric that can be charged either by the diesel engine or from the grid	
38	overnight. Who knows whether these might be available, so don't	
39	preclude them and don't limit yourself to just heavy or light DMUs.	D20-2
40	All right, now with regard to weekend service, my wife and I	
41	are grandparents -- parents and grandparents and all of our progeny live in	
42	San Francisco, and there's frequent travel up and down 101. We have the	
43	benefit of selecting our travel times by being retired; however, in my	D20-2
44	nonscientific assessment, 101 is not less congested on weekends, and we	
45	would be delighted to use SMART rail. We sometimes drive to	
46	(inaudible) as an extra treat, but they come north and we go south, and in	
47	my opinion -- studied opinion, if you want, there is ample need for	D20-3
48	weekend traffic relief by SMART.	
	Finally, I would also use SMART for excursions. We would	D20-3

Comment Set D, cont.  
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1 load our bikes on with the grandkids, and go to Cloverdale and take a  
2 ride. And I don't think I'm speaking for myself here. I think I represent a  
3 sizeable cross section of gray beards. Thank you.

D20-3 cont.

4  
5 **D21 Julian Darley, Post Carbon Institute**

6  
7 MR. DARLEY: Good evening. My name is Julian Darley and  
8 I'm the President of Post Carbon Institute, an international organization  
9 based in Sebastopol. I'm also the author of High Noon for Natural Gas.  
10 I'd just like to put on the record that you face more than one dramatic  
11 challenge, which is frequently mentioned, that is climate change. I would  
12 also like to remind, and I'm sure everyone knows, that peak oil is another  
13 great challenge facing right now. We are in the peak plateau period,  
14 which comes from the global decline. I may remind people or tell people  
15 that we crested at \$115 today for a barrel of oil, and it appears from BBC  
16 reports that the Russians are now suggesting or admitting that they have  
17 peaked. Russia is the largest oil producer on planet Earth and not Saudi  
18 Arabia at the moment. They think they have peaked last year. There are  
19 many, many other countries, which are in decline, having peaked. If the  
20 world output of oil declines at a rate of 3.5 percent starting from roughly  
21 about now; we've been in the plateau phase for about two or three years;  
22 we will be at half production -- half the amount, that's to say about 42  
23 million barrels a day, within 20 years. So by about 2030, there could be  
24 about half the amount and even then we might be lucky. It might go down  
25 faster than that, and we have to ready for spot shortages as well.  
26 Transport will, therefore, be extremely hard hit. Almost all of land  
27 transport depends on fossil fuel, liquid fossil fuels, and it is clear from  
28 engineering and scientific work over the last 150-odd years that rail can  
29 be the most efficient form of land transport that we ever managed to  
30 invent. I may also add in conclusion that electric motors are more  
31 efficient than internal combustion engines. One day we want to have  
32 motorized transport. It will be largely done with electric motors. I note  
33 that in passing. I know there are issues. And that it is also much, much  
34 easier to produce renewable electricity than it is to produce biofuels. Our  
35 institute is doing both and I can say that liquid biofuels are extremely  
36 hard to produce. Thank you very much.

D21-1

37  
38 **D22 David Schonbrunn**

39  
40 MR. SCHONBRUNN: I'm David Schonbrunn with  
41 TRANSDEF, S-C-H-O-N-B-R-U-N-N. And I spoke at the previous  
42 hearing about the issue of connectivity. I've done more thinking about  
43 that and I want to supplement my earlier comments.

44 Unlike San Rafael, Novato has not created a downtown plan  
45 that can provide great regional and local transit. There's no site that will  
46 serve a bus and rail station adequately. Unfortunately, this is because  
47 Novato has seen itself as an auto-dependent city and never really thought  
48 about transit or certainly didn't think about rail, so it hasn't done the

D22-1

Comment Set D, cont.  
Public Meeting Testimony, 4/16/08

1 planning required. That's why we're in a vacuum right at this moment. So  
2 I want to start out by saying that the EIR needs to more closely analyze  
3 Novato's general plan and its downtown plan for specific issues of urban  
4 design. And I'd like to say that urban design is, to me, what ought to be  
5 the driving criterion for the selection of appropriate station sites. Right  
6 now there's no place left to build a joint bus and rail station because the  
7 city developed the only two suitable sites and put grocery stores on them.  
8 That said, it still is entirely possible to provide a good connection to a  
9 downtown station via a stairway that would go from the level of the  
10 station to DeLong, which is significantly higher. And by moving a bus  
11 stop right to there, that would both access the Whole Foods Market as  
12 well as the rail station and provide the best connectivity that's achievable.  
13 So given the issues of urban planning, the driving force here -- Given that  
14 there's only a half a dozen people testifying tonight, may I speak a few  
15 more minutes, Mr. Chairman?

D22-1 cont.

16 So I drove up here tonight because I thought it was important  
17 that you hear this directly. Specifically, I wanted to ask you to study the  
18 transportation benefits of having only one Novato station, namely  
19 downtown. What would that do to the operations of the system in terms  
20 of speeding it up? I'd like to ask you to study what would happen in  
21 terms of the land use implications of having two stations, downtown and  
22 Hamilton with a shuttle to Fireman's Fund. And the principle here is that  
23 by drawing development to the downtown, that is exactly what you want  
24 to do to create the appropriate urbanization inputs. As Julian Darley just  
25 spoke, that's going to significantly reduce VMT and reduce emissions.  
26 And oh, so I've actually finished most of my points. So the whole question  
27 to me on SMART from the environmental standpoint, the major benefit of  
28 SMART is attracting appropriate development to downtowns. If we don't  
29 have a station downtown, that doesn't work. So I ask that these aspects be  
30 studied to provide you with the information you need to select the most  
31 appropriate station sites in Novato. Thank you.

D22-2

32  
33 **D23 Marla Fields**

34  
35 MS. FIELDS: Good evening. Marla Fields. I drove up here  
36 from Novato, and as I was driving up, I calculated in my head that it  
37 actually cost me \$20 in gas to come here to this meeting tonight  
38 roundtrip. And it would have actually only cost me about \$10 to come  
39 here by train, so my true thoughts here made me realize that a very  
40 infrequent user of SMART, four or five times a year, would actually pay  
41 for the sales tax, and I think that's the point we need to communicate.  
42 Okay. I actually am going to prepare quite a few written comments for  
43 you, and so tonight I'm just going to kind of talk in generalities a little  
44 bit. And first of all, I want to just say that the presentation that was done  
45 tonight by Vicki was wonderful. And I think that's the kind of reader-  
46 digest-type information we need to be communicating to the public and to  
47 our public officials, so if that sort of presentation could be put on the  
48 website in addition to maybe a similar one for the original EIR, I would

D23-1

Comment Set D, cont.  
Public Meeting Testimony, 4/16/08

1 encourage you to do that. This document is very technical and it's written  
2 in, and I don't mean and disrespect to the consultants, but it's written in  
3 consultant speak, and I understand the reason for that, but we need some  
4 user-friendly wording out there because there's way too much misinformation  
5 floating around. Okay. So to that, and I'm just going to skip around a  
6 little bit and give you a few comments.

D23-1 cont.

7 I think being user friendly, we need to be crystal clear on  
8 some issues, and some of the things that are mentioned in the EIR are  
9 really far from that. One of them, for example, is the percent reduction in  
10 greenhouse gases as a percent of total project area, which is a bit  
11 nebulous, and after a lot of digging, you realize it includes places like San  
12 Francisco, and San Jose, and Alameda. Instead, I'd like to see us have a  
13 reference point of average Marin or Sonoma emissions, so I think that's  
14 about five or six tons per year, and that really puts into perspective, you  
15 know, what 16,000 tons per year in savings as a conservative estimate  
16 really, really means.

D23-2

17 Also, I think we also need to make sure we're clear about  
18 ridership estimates at Hamilton and how those compare to Atherton, for  
19 example. The way that your findings were representing -- were  
20 represented were in different formats, so it was very difficult to make any  
21 comparisons. And it was also very difficult to determine the actual  
22 census, the number of residents within a half-mile of the proposed station  
23 site, and so it was difficult to come to any kind of conclusion about the  
24 true traffic impact. And let's see, I'm going to skip a little bit.

D23-3

25 But we need also to look at the specific traffic benefits and  
26 impacts of three different scenarios at Hamilton. For those folks that live  
27 off of Main Gate and for those folks who live off of Hamilton Parkway,  
28 they'll be interest in seeing how that differs. The map wasn't in there.

D23-4

29 Also, I appreciate the artist rendition view of the station at Hamilton, but  
30 as we saw tonight, it's largely of trees, which is lovely, but we'd like to  
31 see if there could possibly be an artist rendition that actually showed the  
32 station elements even it was from the perspective of the parking lot. And  
33 let's see, I'm running out of time, but I'd love to see you include green  
34 elements that could be incorporated in the project. Things like solar  
35 powered signals, ticket vending machines are solar powered perhaps,  
36 drought tolerant landscaping, and the like, and then look at how these  
37 elements would further increase the project's reduction in greenhouse  
38 gases. I guess I'm out of time, but I'll submit the rest of the comments  
39 later. Thank you.

D23-5

D23-6

40  
41 **D24 Walter Strakosch**

42  
43 MR. STRAKOSCH: Walter Strakosch, Mill Valley. In my  
44 early career, I did work for the railroad, so I wanted to address the issue  
45 of freight and passenger operation and are they compatible on a single  
46 track. There are several throughout the country that operate both freight  
47 and passenger on a single track, but the nearest one and the one in  
48 California that I think is significant, of course, is the LOSSAN Corridor

D24-1

Comment Set D, cont.  
Public Meeting Testimony, 4/16/08

1 between Los Angeles and San Diego. There are at least 20 Coaster trains  
2 between Oceanside and San Diego, there are at least 8 Metrolink trains  
3 between Oceanside and Los Angeles, and there are at least 24 Surfliner  
4 trains between San Diego and Los Angeles. All these trains are operating  
5 at the same time that the Burlington Northern Santa Fe operates their  
6 freight trains, so usually if it's a well-planned operation and sufficient  
7 passing traction, you're not going to have any problems operating freight  
8 and passenger as a compatible operation; however, I think some of the  
9 nay-sayers are saying that you may have. Now the planned scenario, as I  
10 understand it, for SMART is six trains a day, three roundtrips, and no  
11 problem with that supposedly. But if you get into speculative scenario  
12 number one or speculative scenario number two where you have ten trains  
13 or perhaps sixteen trains a day, this you may have to, of course, explain  
14 more closely how you're going to operate those and you may have to get  
15 into perhaps evening hours. Now there is something that you folks ought  
16 to know about North Coast Railroad and about the operation through Eel  
17 River Canyon to Eureka, and this was published in the LA Times on May  
18 25th, 2003. And it simply says here that, and this is a Caltrans planner  
19 that wrote this, he said, 'The North Coast Railroad Authority resurrection  
20 to go all the way to Eureka would cost from \$500 million to \$1 billion and  
21 require a maintenance expenditure that would rule out profitable operation  
22 under any scenario.' I mention that because, if you have problems from  
23 the nay-sayers, I would expect that, again, speculative scenario number  
24 one and speculative scenario number two may be just that, and it may be  
25 even easier to overcome that argument. Thank you.

D24-1 cont.

D24-2

26  
27 **D25 Bill Kortum**

28  
29 MR. KORTUM: Bill Kortum of Petaluma. I'll be a generalist  
30 here but say that the SMART rail plan is the most powerful land use tool  
31 that's come along in Sonoma County at least since we passed urban  
32 growth boundaries and passed two times an open space district. We need  
33 it very badly. It was also recognized by MTC you were bound to  
34 transportation and never thought of land use. To have them come to  
35 Sonoma County and San Rosa and give us \$475,000 to a land use/  
36 transportation plan and the conference in Oakland the other day and hear  
37 that, that pilot project has been so successful with MTC now that's it  
38 devoting millions more to other transit stations; a very successful  
39 planning process and certainly very important to reduce VMT, as was  
40 mentioned in the studies here. With that, in Santa Rosa, we also have  
41 Sonoma Mountain Village and the planners of Sonoma Mountain Village  
42 claim that because it's their rail station that they'll be a 40-percent  
43 reduction in the use of the automobile. That's where we have to go folks,  
44 so have at it. We're already ahead of you.

D25-1

45 Now I want to say a few words because I can give you some  
46 kind of historical perspective on freight rail. It's become kind of a  
47 bugaboo and somebody that's the enemy or whatever, and it certainly  
48 shouldn't be. We need freight rail at least in this county. We now have

D25-2

Comment Set D, cont.  
Public Meeting Testimony, 4/16/08

1	competitive gravel coming from British Columbia up the Petaluma River	
2	and it could be directly unloaded to railcars and certainly cement plants.	D25-2 cont.
3	We have talked to geologists at Sonoma State and have an enormous	
4	amount of hard-rock and greywacke along the rail corridor clear up into	
5	Mendocino without going to clear up into the Eel River Canyon.	
6	But the one I really want to talk about and have your planner	
7	talk -- or anyway, that everybody is looking north as stuff coming out of	D25-3
8	the north. I have a dairyman and former client that describes the plight of	
9	the dairy industry right now in feed costs. He describes cottonseed meal	
10	and corn being unloaded from railcars in Stockton, and put on trucks and	
11	dropped to Sonoma County. Every bit of feedstuff that's going to the	
12	dairy industry and the poultry industry is coming in here by truck. And	
13	you know, we want that dairy industry, and the livestock industry	
14	essentially is in control of a third of the acreage of this whole county.	
15	We want them strong here and we want them strong in Marin County.	
16	And we need to really do all we can to help them with feed source and the	
17	rail can do it, so that's coming the other way, and you might look into that	
18	in your comments. Thank you.	
19		
20	<b>D26 Steve Birdlebough</b>	
21		
22	MR. BIRDLEBOUGH: Thank you, Mr. Chairman and	
23	Members. My name is Steve Birdlebough, I did not find in the report	
24	any reference to what MTC is doing in terms of its planning criteria,	D26-1
25	which we understand are aimed in the direction of a ten-percent reduction	
26	in vehicle miles traveled over the next 25 years. I think it would be good	
27	to get specific about that because for the casual reader they may not have	
28	linked up those kinds of things.	
29	I would also like to see in the executive summary specific	
30	references to parts of the Sonoma County general plan and the Main	D26-2
31	Countywide plan that call for passenger rail. Similarly, specific	
32	references to the plans for the various cities along the line that call for	
33	passenger rail. I think we need to make quite graphic the fact that	
34	SMART is carrying out plans that have been worked out by local	
35	jurisdictions.	
36	And then I'd like to turn attention to the connectors. On	
37	weekend service, it's going to be important, just as with weekday service,	D26-3
38	that we have connections to local transit. And we have run across a	
39	study, a very helpful study we think, that was done by the former engineer	
40	for the Sacramento Light Rail operation; the comparison between	
41	Sacramento and Columbus, Ohio. Sacramento was able to achieve a light	
42	rail operation in the 1980s. Columbus, Ohio, we seemed to have had a	
43	loss of vision here. Columbus didn't make it. Columbus was unable to	
44	achieve light rail. And so what Schumann did was to go back and look 25	
45	years later what the state of transit was in the two places, and what he	
46	found was that in Sacramento transit doubled. The cost of operation per	
47	passenger mile went up but went up at a very gradual rate. In Columbus,	
48	transit ridership declined. They found that every time they had to make a	

Comment Set D, cont.  
Public Meeting Testimony, 4/16/08

1 raise in rates, they lost passengers and that means they had to cut service,  
2 and that means they had to raise rates and they lost passengers. They  
3 went down, down, and down, and of course, the cost per passenger mile  
4 went up. The result of an investment in rail meant that Sacramento was  
5 able to double its transit usage and to vastly increase the number of riders  
6 on buses. The failure to invest in rail meant that Columbus lost its bus  
7 ridership and is on the downtrend in terms of transit. So if you want  
8 buses to succeed, they need to be connected to something solid. Thank  
9 you.

--oOo--

D26-3 cont.

## **Responses to Comment Set D, cont.** **Public Meeting Testimony, 4/16/08**

### **Comment Set D16 - Allen Tacy**

- D16-1 The comment regarding local jurisdictions' ability to implement Quiet Zones is noted. Also, see Master Response 5.
- D16-2 Comment noted.

### **Comment Set D17 - Tanya Narath, Friends of SMART**

- D17-1 The comment regarding the positive aspects of the proposed SMART project on communities is noted.
- D17-2 The comment regarding the positive aspects of the proposed SMART project on reducing VMT is noted.
- D17-3 The comment regarding support for the proposed SMART project is noted.

### **Comment Set D18 - Kaye Karchevski**

- D18-1 See response B11-12.

### **Comment Set D19 - Willard Richards**

- D19-1 See response C28-1.
- D19-2 See response C28-6.
- D19-3 See response C28-6.
- D19-4 See response C28-3.

### **Comment Set D20 - Jack Swaengen**

- D20-1 See response C22-1.
- D20-2 See response C22-2.
- D20-3 See response C22-2.

### **Comment Set D21 - Julian Darley, Post Carbon Institute**

- D21-1 See response C22-1.

### **Comment Set D22 - David Schonbrunn, TRANSDEF**

- D22-1 The comment regarding Novato's General Plan is noted. However, the purpose of the SMART SEIR is not to evaluate the City's General Plan urban design policies. The General Plan was reviewed to confirm that the project did not conflict with land use and other policies in the Plan. See response B4-1; see also response to comment B4-7 regarding the potential for a future stairway at the Downtown Novato station site.

D22-2 See response B4-4.

**Comment Set D23 - Marla Fields**

D23-1 Comment noted.

D23-2 Greenhouse gas reductions provided by the project are disclosed (Impact AQ-3) throughout the 2005 DEIR, the 2006 FEIR, and the DSEIR. Please see response B3-23 for additional perspective and background information on how reductions are portrayed.

D23-3 See response C24-24 and Master Response 3.

D23-4 See response C24-26.

D23-5 See response to comment C24-27.

D23-6 See response C24-36.

**Comment Set D24 - Walter Strakosch**

D24-1 Comment noted.

D24-2 The comment regarding the prohibitive costs of establishing freight service to Eureka is noted.

**Comment Set D25 - Bill Kortum**

D25-1 The comment regarding the positive aspects of the SMART project as a land use planning tool is noted and will be considered by the SMART Board in its deliberation of the project's merits.

D25-2 Comment noted.

D25-3 Comment noted. See DSEIR page C.6-3 regarding truck traffic offsets assumed in the cumulative analysis. See also comment and response A3-3.

**Comment Set D26 - Steve Birdlebough**

D26-1 The 2009 update of MTC's regional transportation plan (RTP) is currently well underway. As one of its major goals, it seeks to reduce greenhouse gas emissions (GHG) by motor vehicles, in part by reducing the vehicle miles of travel and private vehicles. SMART train service would help promote this goal, by diverting trips from motor vehicles to transit, especially during congested peak hours when GHG emissions tend to be highest, per mile driven, due to stop-and-go traffic.

D26-2 See response to comment B5-1.

D26-3 The study referred to in the comment is *Assessing Transit Changes in Columbus, Ohio, and Sacramento, California: Progress and Survival in Two State Capitals, 1985–2002*, John Schumann, 2002. The beneficial effect of rail service on local transit is noted. SMART would work closely with local transit operators to promote coordinated services with them on the weekends.

## 3. Revisions and Corrections to the Draft SEIR

This section includes the revisions to the Draft SEIR. These revisions and corrections have been made in response to comments or based on SMART staff and consultant review. The revisions do not change any of the impact conclusions presented in the Draft SEIR.

These revisions appear here in the order they appear in the Draft SEIR. Text additions appear in underline and text deletions appear in ~~strikeout~~.

### Section B.4, Environmental Compliance Measures

A new environmental compliance measure is added to Section B.4 of the DSEIR:

The construction plan for station sites shall contain detailed provisions for the protection of existing mature oak trees and these provisions shall be conveyed to all construction personnel.

### Section C.2, Regional Setting, Air Quality

Revise DSEIR Section C.2.2.1, Air Quality Regional Setting, (page C.2-3) as follows:

The BAAQMD 2005 Ozone Strategy describes how the Bay Area will fulfill California Clean Air Act planning requirements to attain state ozone standards and mitigate ozone transport to downwind air districts. This plan was formerly known as the “Clean Air Plan,” and BAAQMD must update the plan triennially. This would occur in a public process that is expected to begin in ~~will complete the most recent update of the plan in early 2008.~~

### Section C.3.5, Public Safety Impacts, Weekend Service

Modify the second paragraph of Section C.3.5, Impact PFS-4 (page C.3-16) to clarify that the total number of accidents, rather than the accident rate, may slightly decrease with the addition of weekend passenger service:

Weekend service would increase the total rail vehicle-miles traveled on weekends in Marin and Sonoma Counties, and would be expected to result in a decrease in the total motor vehicle-miles traveled on weekends in the two counties (see Section C.4.1). As travel by commuter rail is safer than by motor vehicle, weekend service may slightly decrease the overall ~~accident rate per vehicle mile traveled~~ number of accidents in the counties on weekends. Weekend service would have no adverse impact on schools.

**Sonoma-Marín Area Rail Transit  
3. REVISIONS AND CORRECTIONS TO THE DRAFT SEIR**

**Section C.5, Novato South Station Alternatives, Transportation**

Correct the dates in the No-Project and Proposed Project columns in Table C.5-1 as follows:

**Table C.5-1. Existing and Year 2025 Intersection Level of Service for Alternative Novato South Station Sites – Weekdays**

Int. Station #	Station Alternative	Extg. Control <sup>2</sup>	Intersection	Existing Conditions						2005 2025 No-Project <sup>1</sup>						2005 2025 with Proposed Project					
				AM			PM			AM			PM			AM			PM		
				LOS	Delay (sec)	Delay (sec)	LOS	Delay (sec)	Delay (sec)	LOS	Delay (sec)	Delay (sec)	LOS	Delay (sec)	Delay (sec)	LOS	Delay (sec)	Delay (sec)	LOS	Delay (sec)	Delay (sec)
1	Downtown	S	Redwood Blvd./Diablo Av	C	31.7	D	35.2	D	39.7	D	50.4	D	39.9	D	50.8	D	39.9	D	50.8		
2	Downtown	S	Reichert/DeLong Av	C	30.2	C	28.5	C	31.8	E	59.8	C	32.1	E	60.9	C	32.1	E	60.9		
3	Downtown	S	US 101 SB Ramps/DeLong Av	B	16.2	A	10.0	D	47.7	C	27.1	D	47.8	C	27.2	D	47.8	C	27.2		
4	Downtown	S	US 101 NB Ramps/DeLong Av	B	18.0	C	20.5	B	19.1	D	44.6	B	19.1	D	44.8	B	19.1	D	44.8		
5	Downtown	AWSC	Reichert Av/Grant Av	A	9.7	B	10.6	C	15.4	F	65.3	C	16.2	F	72.3	C	16.2	F	72.3		
6	Downtown	TWSC	Railroad Av/Grant Av	B	11.3	B	14.0	B	14.6	D	28.0	B	14.9	E	37.0	B	14.9	E	37.0		
7	Ignacio Wye	None	Station Entrance/Marsh Dr	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
8	Hamilton	None	Station Entrance/Hamilton Pkwy	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X	X		
9	Hamilton	S	Nave Dr/Hamilton Pkwy	B	17.2	B	17.3	D	35.9	E	66.5	D	35.9	E	66.5	D	35.9	E	66.5		
10	Hamilton	S	Nave Dr/Main Gate Rd	C	21.5	C	24.7	D	40.7	F	*	D	40.7	F	*	D	40.7	F	*		
11	Hamilton	Yield	US 101 NB Ramps/Nave Dr	C	19.0	C	20.4	D	30.9	F	98.8	D	30.9	F	98.8	D	30.9	F	98.8		
12	Hamilton	TWSC	US 101 SB Ramps/Alameda del Prado	F	120	C	20.0	F	*	F	66.4	F	*	F	66.4	F	*	F	66.4		
13	Roblar	S	US 101 NB onramp/Ignacio Blvd	B	17.6	C	23.0	C	25.8	D	38.3	C	25.8	D	38.3	C	25.8	D	38.3		
14	Roblar	S	US 101 SB/Ignacio Blvd	C	25.8	C	25.4	C	29.0	C	31.1	C	29.0	C	31.1	C	29.0	C	31.1		

See Table C.5-4  
for various Hamilton  
Subalternatives

### **Section C.5.3.1, Transportation, Hamilton Station Site**

Modify page C.5-33 as follows:

#### ***Connecting Transit and Shuttle Services (Existing and Proposed)***

Current transit services near this station site include:

- Hamilton Shuttle (Whistlestop Wheels), funded by the ~~City of Novato~~ Hamilton Home-owners Association, that connects Hamilton to the Alameda del Prado park-and-ride lot
- GGT routes 49 and 58 on Hamilton Parkway and Main Gate Road
- Other GGT routes on Nave Drive
- The Marin Airporter terminal at 1455 North Hamilton Parkway, just off Nave Drive. The Marin Airporter provides service to the SFO airport hourly between 4 AM and 10 PM every day.

### **Section C.5.3.7, Land Use and Policy Considerations, Hamilton Station Site**

Modify Section C.5.3.7, Land Use and Policy Considerations, page C.5-43, as follows:

#### **Setting**

The Hamilton Station site is in the urban area of the Hamilton Field community, which is part of the City of Novato. It is designated in the General Plan as Community Facilities, with Precise Development Hamilton Field zoning. The vacant site is crossed by transmission lines and has several transmission line towers along its perimeter. The site is designated for transit use in the Hamilton Field Master Plan. Adjacent uses include single family homes to the northeast (on Marblehead Lane and Chapel Hill Road), the Novato Charter School across the tracks to the west and vacant land to the northwest. The station site is bounded by the Main Gate Road overpass on the southwest side. The Novato Charter School buildings across the tracks are elevated and set back from the SMART right-of-way. School play grounds and other outdoor areas (parking and garden area) are between the school buildings and the right-of-way. The Charter school property is fenced from the rail right-of-way. The property adjacent to the northern boundary of the charter school is slated for development as an alternative educational facility, according to the Novato Unified School District. This property is across the tracks and northwest of the station site.

#### **Impacts**

Construction-related land use impacts are identical to those described in Section 3.11.6 of the SMART 2005 DEIR and are negligible, as construction would not temporarily divide an established community, conflict with land use plans, nor result in the conversion of agricultural land. All construction should be confined to the site, avoiding the need for adjacent construction staging areas and minimizing disturbances to nearby residences.

Given the current general plan designation, the presence of the railroad tracks, and surrounding urban land uses, the site's use as a station would be consistent with plans and policies. The site would not present physical features that divide the community. School safety issues are addressed in Section C.5.3.9.

Consistent with the beneficial Land Use Impact LU-2 identified in the SMART 2005 DEIR, the rail station would be supportive of existing commercial and residential uses in the nearby area. Furthermore, rail ridership is expected to be higher at this location than at the original Roblar Drive Station site, and the highest of any of the alternatives studied in this SEIR due to the proximity of land uses that would benefit from use of the train.

### **Section C.5.3.9, Public Safety, Hamilton Station Site**

The text of Section C.5.3.9, Public Safety (Setting and Impacts subsections), page C.5- 44, has been revised:

#### **Setting**

Safety provisions at the Hamilton Station site would be identical to safety features identified for other proposed stations in Section 2.5.4 of the 2005 DEIR. The Novato Charter School (K through 8), Nexus Academy (6 through 12), and the North Bay Children's Center daycare facility (Pre-K through 6) are is-located across the tracks from the site of the proposed Hamilton Station. Hamilton Elementary School (K through 5) is located nearby on Main Gate Road, but is not adjacent to the railway corridor or the station site. In addition, the Novato Unified School District indicates that property adjacent to the Novato Charter School (to the north) is slated for development of an alternative education center.

#### **Impacts**

Impacts on public safety at the Hamilton Station site would not occur above the level of impact evaluated in the SMART 2005 DEIR and 2006 FEIR, as public safety provisions would not change. As identified in the 2005 DEIR, all impacts would be less than significant. Refer to DEIR Section 3.12 and FEIR p. 3.2-43 for a discussion of impacts on public safety at rail stations. The proximity of the station site to Novato Charter School, Nexus Academy, the North Bay Children's Center, Hamilton Elementary and future school uses on property adjacent to the charter school would not create a significant hazardous condition. Rail operations safety hazards in relation to nearby schools were addressed in Impact PFS-4 in the 2005 DEIR and were found to be less than significant. All of the school structures are on the opposite side of the tracks from the station site. Novato Charter School, which is the closest school to the station site, is elevated and set back from the right-of-way, with a fence between the school property and the station site. As explained in DEIR Section 3.12, with implementation of SMART's environmental compliance measures, including fencing, safety structures, and signage plus an in-school safety education program, impacts on the safety of schoolchildren would be less than significant.

SMART's proposed pedestrian/bicycle pathway (between the tracks and the Novato Charter School property) would include a safety structure in the vicinity of the school. SMART will install these safety structures between the pedestrian/bicycle pathway and the railroad. SMART has committed to working with local communities to design the appropriate safety structures consistent with safety requirements and community land use, including school proximity.

### **Section C.6.4.1, Cumulative Noise Impacts**

Section C.6.4.1, page C.6-15, second paragraph is modified as follows:

#### ***Train Horn Noise***

As already determined in the 2005 DEIR, there would be a significant project and cumulative impact from train horn noise near grade crossings. Since the number of freight trains proposed in NCRA's NOP is three roundtrips rather than the four roundtrips considered in the 2005 DEIR, this cumulative impact ~~would~~ may not be any greater than analyzed in the 2005 DEIR. The combination of longer freight train lengths, additional locomotives, and use of train horns could result in a larger area of cumulative train horn noise impact than shown for the SMART project. Nevertheless, the conclusion in the 2006 FEIR that cumulative train horn noise would be significant without implementation of Quiet Zones remains

unchanged. SMART has proposed assisting local jurisdictions in obtaining Quiet Zone designations, which, if implemented, would eliminate SMART's project level and contribution to cumulative noise impacts from train horns (Mitigation Measure N-5 in the 2005 DEIR and 2006 FEIR).

## 4. References

A complete set of references used for the DSEIR is provided in Section F of the DSEIR. In addition to the references listed in the DSEIR, the following new references were used in preparation of the FSEIR.

Alta Planning + Design for U.S. Department of Transportation. 2002. *Rails With Trails: Lessons Learned*.

Grunt, Hans. 2007. Personal written communication. City Planner, City of Novato. October 17, 2007.

Office of Safety, FRA. 2008. *Quiet Zones – In Depth Workshop*, presented by Ron Ries. Highway Rail Crossing and Trespasser Programs, Ventura, CA. May 14, 2008.

Parsons Brinckerhoff. 2003. Long Term Financial and Economic Feasibility of the Northwestern Pacific Railroad (January 2003).

Rails to Trails Conservancy. 2000. *Rails with Trails: Design, Management, and Operating Characteristics of 61 Trails Along Active Rail Lines*.

URS Greiner Woodward Clyde. 1998. Geologic and Geotechnical Report, North Coast Railroad, Northern California (prepared for FEMA, December 1998).

W-Trans. 2002. Final Report 2002 Citywide Traffic Model Update, for the City of Novato. April 16, 2002.

The listing of report preparers in Section G of the DSEIR is unchanged for the FSEIR.



Caltrans SMART Healdsburg Extension Performance Metrics  
2024 Solutions for Congested Corridors Program

<b>Existing Average Annual Vehicle Volume on Project Segment</b>		N/A				
<b>Estimated Year 20 Average Annual Vehicle Volume on Project Segment with Project</b>		N/A				
<b>Measure</b>	<b>Metric</b>	<b>Project Type</b>	<b>Build</b>	<b>Future No Build</b>	<b>Change</b>	<b>Increase/Decrease</b>
<b>Congestion Reduction</b>	Change in Daily Vehicle Miles Traveled (VMT)	All	3,996,000	4,089,684	-93,684	Decrease
	Person Hours of Travel Time Saved		598,197.6	435,090	163,107.6	Increase
	(Optional) Change in Daily Vehicle Hours of Delay	Highway				
	(Optional) Percent Change in Non-Single Occupancy Vehicle Travel	Local Road, Highway				
	(Optional) Per Capita and Total Person Hours of Delay per Year					
	(Optional) Other Information	All				
<b>Throughput</b>	(Optional) Peak Period Person Throughput – by applicable mode	All				
	(Optional) Passengers Per Vehicle Service Hour	Transit Rail and Transit Bus				
	(Optional) Other Information	All				
<b>System Reliability</b>	Peak Period Travel Time Reliability Index (“No Build” Number Only)	National and State Highway System Only				
	Level of Transit Delay	Transit Rail and Transit Bus	18.4	40.02	-21.62	Decrease
	(Optional) Other Information	All				



Caltrans SMART Healdsburg Extension Performance Metrics  
2024 Solutions for Congested Corridors Program

Measure	Metric	Project Type	Build	Future No Build	Change	Increase/Decrease
<b>Safety</b>	Number of Fatalities	All	7	8	-1	Decrease
	Rate of Fatalities per 100 Million VMT		0.15997	0.17885	-0.01888	Decrease
	Number of Serious Injuries		72	74	-2	Decrease
	Rate of Serious Injuries per 100 Million VMT		1.64548	1.65244	-0.00696	Decrease
	(Optional) Number of Non-Motorized Fatalities and Non-Motorized Serious Injuries					
	(Optional) Other Information					
	(Optional) Number or Rate of Property Damage Only Collisions	Local Road, Highway				
	(Optional) Number or Rate of Non-Serious Injury Collisions					
	(Optional) Accident Cost Savings					
<b>Economic Development</b>	Jobs Created	All	2,496	0	2,496	Increase
	(Optional) Other Information					
<b>Air Quality and Greenhouse Gases</b>	Particulate Matter (PM 10)	All	0	4	-4	Decrease
	Particulate Matter (PM 2.5)		0	4	-4	Decrease
	Carbon Dioxide (CO2)		0	193,717	-193,717	Decrease
	Volatile Organic Compounds (VOC)		0	15	-15	Decrease
	Sulphur Oxides (SOx)		0	2	-2	Decrease
	Carbon Monoxide (CO)		0	351	-351	Decrease
	Nitrogen Oxides (NOx)		0	172	-172	Decrease



Caltrans SMART Healdsburg Extension Performance Metrics  
2024 Solutions for Congested Corridors Program

Measure	Metric	Project Type	Build	Future No Build	Change	Increase/ Decrease
<b>Accessibility</b>	(Optional) Number of Jobs Accessible by Mode	All				
	(Optional) Access to Key Destinations by Mode	All				
	(Optional) Percentage of Population Defined as Low Income or Disadvantaged within ½ mile of a rail station, ferry terminal, or high-frequency bus stop	Transit Rail and Transit Bus				
	(Optional) Other Information	All				
<b>Cost Effectiveness</b>	Cost-Benefit Ratio	All	5.3	0	5.3	Increase
	(Optional) Other Information					