



Protecting Marin Since 1934

February 4, 2020

District Board of Directors  
Sonoma-Marín Area Rail Transit  
5401 Old Redwood Highway, Suite 200  
Petaluma, CA 94954

Dear Members of SMART District's Board of Directors:

Marin Conservation League is a well-established conservation organization in Marin County, with an eighty-five-year history of environmental advocacy. We track issues related to land use, transportation, water, agriculture, public lands, and climate change and their associated impacts on natural resources. While Marin Conservation League (MCL) supports most publicly funded transit, it does not support renewing the SMART sales tax (Measure I) at this time.

MCL asks SMART's Board of Directors, as its policy setting authority, to work with SMART's management to respond to current public concerns. In the future, it will be important for SMART to provide a concrete plan to the community on how it will fulfill the original Measure Q's promises, particularly in regard to the following claims:

- "Relieve traffic, fight global warming and increase transportation options."
- "Provide a bicycle/pedestrian pathway linking the stations, and connections to ferry/bus service."

MCL's concerns are listed below:

**SMART's greenhouse gas (GHG) emission reductions have been minimal given the costs.**

SMART's claim of reducing 8 million pounds of carbon dioxide emissions to date equates to only 2,000 tons of CO<sub>2</sub> emissions reduction per year — 1/7th of 1% of Marin's annual GHG emissions — a de minimus amount given the \$46 million annual SMART subsidy from sales tax and state grants. This cost of reducing GHG emissions amounts to over \$20,000 per ton of CO<sub>2</sub> — over 1,000 times more than the \$17 per ton of CO<sub>2</sub> value that the cap-and-trade market places on additional GHG-reducing activities. Even many relatively expensive ways of reducing GHGs are far cheaper than SMART's efforts.

**SMART has increased traffic congestion and air pollutants from autos in some cities.**

SMART has greatly increased traffic delay and congestion at intersections with at-grade rail crossings in some cities along the corridor, decreasing Level of Service (LOS) and increasing both air pollution and GHG emissions from idling engines. SMART must actively work with other agencies to address congestion impacts along its corridor.

Proposed State housing bills, such as the recently defeated SB50, would focus growth and increased residential density around transit stations. These bills aim to capitalize on public investment in transit, increase transit ridership, and thereby mitigate added traffic congestion. However, because SMART's ridership is low and its destinations are not dense enough to reap those benefits, traffic congestion and air pollution will likely increase.

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**SMART's rail infrastructure is not adapted to sea level rise.**

When the SMART track was upgraded, it was rebuilt through large swaths of low-lying marshland along Gallinas Creek, through St. Vincent's/Silveira properties, and in the Novato Creek watershed. SMART did not invest in building a rail system that is "climate ready," very likely necessitating additional future heavy expenditures to adapt to sea level rise.

**SMART's long-promised bicycle/pedestrian pathway remains incomplete.**

The pathway promised in the original Measure Q aimed to provide safe passage between stations, and to infrastructure that provides connections to other transit options, walking and biking connections, or parking lots and pickup points. The pathway is an important part of the project that further reduces greenhouse gas emissions. SMART has built little pathway on its own and its current strategic plan has removed key segments of the pathway.

The following questions must be addressed by the SMART Board of Directors:

- How does SMART plan to dramatically increase its ridership, which would reduce GHG emissions and air pollutants from gas-powered cars, at least to some extent?
- How does SMART plan to provide for adaptation to sea level rise along critical portions of its track? How will the train operate during storms and king tides as tidal levels continue to rise?
- How does SMART plan to provide the community with better information and more opportunities for input into SMART decision-making processes?

Until SMART addresses the questions above and improves its transparency and accountability, MCL does not support extension of the quarter-cent sales tax for SMART. Marin Conservation League will follow SMART as it continues to evolve and attempts to meet the challenges ahead to provide effective mass transit.

Sincerely,



Linda Novy  
President

cc Congressman Jared Huffman  
State Senator Mike McGuire  
State Assemblymember Marc Levine