APPENDIX K

Caltrans SR 37 PEL Questionnaire

- 1. Background:
 - a. What is the name of the PEL study and other identifying information (e.g., sub-account or STIP numbers, long-range plan, corridor plan, or transportation improvement program years)?

State Route 37 Planning and Environmental Linkages Study

b. Who is the sponsor of the PEL study? (Caltrans, Local Agency, Other)

The State Route (SR) 37 PEL Study was sponsored by the California Department of Transportation (Caltrans) in affiliation with the Metropolitan Transportation Commission (MTC) and the four regional transportation planning agencies: Transportation Authority of Marin (TAM), Sonoma County Transportation Authority (SCTA), Napa Valley Transportation Authority (NVTA), and Solano Transportation Authority (STA).

c. What is the basis for undertaking a PEL study?

The scope of the SR 37 PEL Study was to bridge the gap between project planning and environmental phases of the corridor, streamline environmental and permitting phases, and reduce long-term project costs, time, and risk to the public by:

- Compiling and integrating previous work, including several past studies
- Identifying and supplementing data needs
- ^a Engaging partners and agencies in a facilitated forum to evaluate alternatives
- Developing a cohesive implementation plan integrating proposed transportation projects and restoration/mitigation considerations
- 2. Provide a description of the existing transportation facility within the corridor, including project limits, modes, functional classification, number of lanes, shoulder width, access control and type of surrounding environment (urban vs. rural, residential vs. commercial, etc.)

SR 37 follows approximately 21 miles along the northern shore of San Pablo Bay linking US 101 in Novato, Marin County with Interstate 80 (I-80) in Vallejo, Solano County. It serves as a vital connection between Marin, Sonoma, Napa, Solano, and Contra Costa Counties and the Central Valley. SR 37 is divided into three portions: western, middle, and eastern. The western portion, a 7.2-mile, four-lane expressway type facility, starts at the US101 and conforms to SR 121 junction at Sears Point. The middle portion, a 9.5-mile, two-lane conventional highway is from Sears Point to the Walnut Avenue interchange just west of the Napa River Bridge. The eastern portion, a 2.1-mile, four-lane freeway, is from the Napa River Bridge to SR 29.

Although SR 37 does not run through Napa County, it serves as a vital connection, serving job markets and housing between the four counties of the North Bay Area: Marin, Sonoma, Napa, and Solano. The route also provides access to popular destinations such as the Golden Gate National Recreation Area in Marin County, Sonoma Sears-Point Raceway, Six Flags Discovery Kingdom Amusement Park, Napa and Sonoma wine regions, and the North Coast.

Bicyclists are permitted along the route from US 101 to Mare Island, but there are no designated bicycle or pedestrian facilities except for small sections of the Bay Trail that roughly parallel the corridor; high vehicle speeds of 60 plus mile per hour make riding and walking very stressful. Bicycle and pedestrian access is prohibited along the freeway portion of the route in Solano County.

Additional details about the corridor can be found in the SR 37 PEL Study Report, Chapter 1, Introduction.

3. Provide a brief chronology of the planning activities and documents prepared prior to the PEL study. This may include modal studies, traffic and safety analysis, community and environment priorities, etc.

The following studies were consulted for the SR 37 PEL Study:

June 2020

Bay Area Regional Collaborative/Team Common Ground. Grand Bayway: SR-37 Public Access Scoping Report

https://barc.ca.gov/our-work/resilient-bay-area/progress-resilient-design-challenge/grandbayway

May 2020

Sonoma Creek Baylands Strategy

https://www.sfei.org/projects/sonoma-creek-baylands-strategy

February 2020

SR-37 Corridor Adaptation Study (Segment A-1 Adaptation Strategies) https://www.tam.ca.gov/wp-content/uploads/2020/02/7-SR-37-Seg-A1-Adaptation-Study.pdf

May 2019

Passenger Rail Service Novato to Suisun City Feasibility Study California State Rail Plan. (Sonoma-Marin Area Rail Transit (SMART)

https://scta.ca.gov/wp-content/uploads/2019/09/SMART-Passenger-Rail-Service-Novato-to-Suisun-City-Report_reduced.pdf

May 2019

Napa Valley Transportation Authority Travel Behavior and Transit Feasibility Report. Fehr & Peers

https://www.nvta.ca.gov/sites/default/files/SR37_Travel_Behavior_Transit_Feasibility_5-3-2019.pdf

April 2019

State Route 37 Alternatives Assessment Report for the Ultimate Project (State Route 37 from SR 121 to the Mare Island Interchange)

https://scta.ca.gov/wp-content/uploads/2019/09/State-Route-37-Alternatives-Assessment-April-2019.pdf

June 2018

State Route 37 – Segment A Sea Level Rise Corridor Improvement Study https://scta.ca.gov/wp-content/uploads/2018/10/SR-37-Segment-A-Sea-Levl-Rise-Corridor-Improvement-Study-Final.pdf

May 2018 Resilient by Design - The Grand Bayway Project http://www.resilientbayarea.org/grand-bayway

February 2018

SR 37 Transportation and Sea Level Rise Corridor Improvement Plan http://scta.ca.gov/wp-content/uploads/2018/02/SR-37-Corridor-Plan-with-appendix.pdf

November 2017

State Route 37 Corridor Financial Opportunities Analysis http://scta.ca.gov/wp-content/uploads/2017/12/PFAL-SR-37-November-2017-FINAL-REPORT.pdf

November 2017

SMART Rail System Expansion and Opportunities http://scta.ca.gov/wp-content/uploads/2017/11/State-Rail-Plan_11.01.2017.pdf

June 2017

Marin Shoreline Sea Level Rise Vulnerability Assessment https://www.marincounty.org/~/media/files/departments/cd/planning/slr/baywave/vulnera bility-assessment-final/final_allpages_bvbconsulting_reduced.pdf?la=en

February 2016

State Route 37 Integrated Traffic, Infrastructure and Sea Level Rise Analysis Multiple reports: https://hwy37.ucdavis.edu/resources

October 2015

The Baylands and Climate Change – Baylands Ecosystem Habitat Goals https://www.sfei.org/projects/baylandsgoals

January 2015

State Route 37 Transportation Concept Report

https://scta.ca.gov/wp-content/uploads/2016/05/TCR-37-FINAL-1-12-15.pdf

September 2014 SCTA SR-37 O/D Study https://scta.ca.gov/wp-content/uploads/2016/05/SCTA-OandD-Study-Sept-2014.pdf

July 2013 State Route 37 Stewardship Study https://hwy37.ucdavis.edu/about 4. Are there related recent, current, or near future planning studies or projects in the vicinity? What is the relationship of the PEL study to those studies/projects?

As stated in the response to #3 above, many recent studies conducted by other agencies helped lead Caltrans to the decision to prepare this PEL. Caltrans's PEL Study Project Management Team (PEL Study Team) drew its initial alignments directly from these studies. Alignments 1–7 each originated in one of these earlier reports. In addition to the studies identified in the response to #3, multiple near-term operational, maintenance, and pedestrian safety enhancement projects are planned by Caltrans and others to keep the existing SR 37 in a state of good repair and to make it more functional and predictable for users. The SR 37 Pavement Rehabilitation, SR 37 Bridge Preservation, SR 37 / SR 121 Intersection at Sears Point project, Sears Point to Mare Island Improvement Project, improvements at the Napa River Bridge and SR 37 / Fairgrounds Drive, and the Flood Reduction Project in Marin County are examples of proposed projects to deliver interim solutions. Beyond these near-term projects, the PEL Study Team has considered options for dividing the preferred alternative into several smaller projects, each of which could deliver improvements independently but eventually be integrated into the entirety of the preferred alternative identified in this SR 37 PEL Study.

Additional details on project implementation strategies can be found in the SR 37 PEL Study Report, Chapter 8, Implementation Plan.

5. Who is included on the study team (name of sponsoring agencies, consultants, etc.) and what are their anticipated roles and responsibilities?

PEL Study Team: Caltrans is the lead agency for the SR 37 PEL Study. Caltrans partnered in this effort with MTC, TAM, SCTA, NVTA, and STA.

Policy Committee: The Policy Committee is composed of elected officials with jurisdictions in the SR 37 corridor and considered recommendations for the SR 37 PEL Study put forth by the PEL Study Team.

Executive Steering Committee (ESC): The ESC is composed of executive directors of Caltrans, MTC, and the four county transportation agencies and provided strategic direction to the Policy Committee and the Project Leadership Team (PLT).

Project Leadership Team: The PLT consisted of the managers and staffs of Caltrans, MTC, Transportation Authority of Marin, Sonoma County Transportation Authority, Napa Valley Transportation Authority, and Solano Transportation Authority. This team vetted technical, policy, and other related project issues and elevated them as appropriate to the ESC.

Stakeholder Working Group (SWG): Consisted of 185 individuals and representatives of 71 organizations. See SR 37 PEL Study Report, Chapter 2 and Appendix B, State Route 37 Corridor Planning and Environmental Linkages Study Agency, Stakeholder, and Public Outreach and Participation. The SWG informed the PEL process, reviewed progress, and provided direction for equity, consistency with local corridor needs, and areas of jurisdiction.

The SWG also served as credible messengers to their communities and constituencies regarding information that was developed as part of the SR 37 PEL Study.

Resource Agency Partners (RAP): The RAP consisted of representatives from state and federal resource and regulatory agencies who provided focus on their agencies' roles, responsibilities, and jurisdiction. The RAP was formed to foster agency collaboration with Caltrans, in a role similar to that of a NEPA cooperating agency, and provided expertise in their areas of jurisdiction to help ensure that the interests and regulations of their agencies were met. The RAP provided continuity, participation, and input from the resource and transportation agencies, complementing and supporting the Technical Working Groups (TWGs) and the PEL Study Team.

- San Francisco Bay Conservation and Development Commission (BCDC)
- California Department of Fish and Wildlife (CDFW)
- U.S. Environmental Protection Agency (EPA)
- National Marine Fisheries Service (NMFS)
- San Francisco Regional Water Quality Control Board (RWQCB)
- U.S. Army Corps of Engineers (USACE)
- U.S. Coast Guard (USCG)
- U.S. Fish and Wildlife Service (USFWS)
- Caltrans, acting for the FHWA per NEPA Assignment MOUs

Technical Working Groups: Three TWGs—Design, Environmental, and Traffic—composed of key Caltrans traffic engineering, planning, and environmental staff, consultant technical experts, and corridor representatives from local jurisdictions' Public Works and Open Space staff. See SR 37 PEL Study Report, Appendix B for a full list. This group advised and guided technical aspects of the SR 37 PEL Study.

Consultant Team: The consultant team consisted of ICF, Jacobs Engineering, Fehr and Peers, and Zephyr Collaboration. The consultant team supported Caltrans with development of the SR 37 PEL Study including collaboration with stakeholders, developing forecasts of traffic demand, and identifying and evaluating alternatives.

- 6. Methodology used:
 - a. Is the intent for the PEL study to be (1) incorporated by reference into the NEPA/CEQA process or (2) for the NEPA/CEQA process to adopt specific PEL outcomes directly?

This SR 37 PEL Study will support a subsequent NEPA/CEQA process both by providing outcomes that can be directly adopted and by providing material that can be incorporated by reference, in particular for the existing conditions assessment. This was done with an eye to making such language more readily adaptable into future National Environmental Policy Act (NEPA)/California Environmental Quality Act (CEQA) documentation.

b. Is the PEL study documentation sufficiently detailed to be used in NEPA/CEQA? If not, explain.

The SR 37 PEL Study documentation is sufficiently detailed to provide a foundation to guide further detailed studies that will be required at the time NEPA/CEQA analysis is initiated.

c. What were the actual NEPA/CEQA terms used and how did you define them?

Examples of NEPA/CEQA terms used in the SR 37 PEL Study are purpose and need, existing conditions, range of alternatives, logical termini and independent utility, environmental impact(s), and preferred alternative.

d. How do you see these terms being used in NEPA/CEQA documents?

In a manner consistent with federal and state guidance and the Caltrans Standard Environmental Reference.

e. What were the key steps and coordination points in the PEL decision-making process?

Caltrans structured the SR 37 PEL Study to be driven by the input of its working groups. For each of the critical steps below, the PEL Study Team engaged with the three TWGs and the SWG in order to seek input, vet recommendations, and gain agreement. This was achieved through a series of interactive workshops with these groups between spring 2021 and summer 2022.

- Corridor Vision, Goals, Purpose, and Need
- Range of Alternatives
- Evaluation Criteria (Levels 1, 2, and 3)
- Alternatives Screening (Levels 1, 2, and 3)
- Selection of Preferred Alternative

The working groups were composed of members of federal, state, and local agencies and Native American Tribes along with representatives of non-governmental organizations. Please refer to SR 37 PEL Study Report Appendix B for the list of working group participants.

f. Who were the decision-makers and who else participated in those key steps?

Recommendations of the working groups were presented to the Policy Committee, ESC, and Project Leadership Team for concurrence. Caltrans is the ultimate decision-maker.

- 7. Agency coordination:
 - a. Provide a description of coordination with federal, Tribal, state and local environmental, regulatory and resource agencies. Describe their level of participation and how you coordinated with them.

Project staff conducted outreach to state and federal resource agencies, communitybased and non-governmental organizations including those focused on disadvantaged communities, regional transportation planning agencies, elected officials, Native American Tribe representatives, and members of the public. Please refer to question 6e above and SR 37 PEL Study Report Chapter 2, Agency, Stakeholder, and Public Engagement.

Participating federal agencies:

- EPA
- Federal Highway Administration (FHWA) California Division
- □ NMFS
- San Pablo Bay National Wildlife Refuge
- USACE
- USCG
- U.S. Geological Survey

Participating State Agencies, Counties, and Cities, Others:

- CDFW
- Coastal Conservancy (SR 37-Baylands Group)
- California State Lands Commission
- San Francisco Bay Regional Water Quality Control Board
- BCDC
- Marin County and departments/agencies
- Napa County and departments/agencies
- Solano County and departments/agencies
- Solano Resource Conservation District
- Sonoma County and departments/agencies
- Sonoma County Regional Parks
- Sonoma County Transportation and Public Works
- Sonoma County Water Agency and Sonoma Valley County Sanitation District
- City of American Canyon and departments
- City of Novato and departments
- City of Novato Sanitary District

- City of Petaluma and departments
- City of Vallejo and departments
- Greater Vallejo Recreation District
- Vallejo Sanitary and Flood Control District

Please refer to SR 37 PEL Study Report Chapter 2 for a comprehensive description of the coordination activities and meetings conducted throughout the SR 37 PEL Study. Appendix B provides examples of outreach and meeting materials.

b. What other transportation agencies/organizations (jurisdictions, MPOs, FHWA, other) are included in the PEL study? What are the roles and responsibilities?

Please see response to Question 7a

c. What actions will be needed to ensure support from each agency during NEPA/CEQA scoping?

From the outset of the SR 37 PEL Study, Caltrans has made an effort to fully engage other agencies in establishing the project purpose and need, the range of alternatives, and the preferred alternative. Caltrans has solicited letters of support for the PEL process from these and other agencies; these are included in Appendix L, *Letters of Support*. Caltrans anticipates this participatory process during the PEL will continue into project implementation.

- 8. Public coordination:
 - a. Provide a description of the intended coordination with the public and stakeholders.

Please refer to SR 37 PEL Study Report Chapter 2 for a comprehensive description of the public and stakeholder coordination activities and meetings conducted throughout the SR 37 PEL Study. Appendix B provides examples of outreach and meeting materials.

a. Document the initial public notification of the PEL study and the intended outcome.

Please refer to the SR 37 PEL Study Report Chapter 2 and Appendix B.

- 9. Purpose and Need for the PEL study:
 - a. Will the PEL study develop a purpose and need for adoption during NEPA? If not, how will the transportation need identified in the PEL study be documented to inform NEPA?

A purpose and need statement was developed through the collaborative process involving project sponsors, TWGs, SWG, RAP, and public participation. This purpose and need statement will inform the purpose and need for the NEPA documents.

b. Document the purpose and need statement.

The SR 37 PEL Study purpose and need are documented in the SR 37 PEL Study Report Chapter 3, Vision, Purpose, and Need.

- c. Alternately, document the corridor vision, goals, and objectives and how these relate to the PEL study area. What steps will be needed during the NEPA/CEQA process to make this a project-level purpose and need statement?
 - Evaluate long-term integrated solutions that address the SR 37 corridor's vulnerabilities and facilitate the restoration of the surrounding baylands.
 - Improve route reliability, mobility, and connectivity across all modes and maintain public access.
 - Implement nature-based solutions to enhance resilience while simultaneously facilitating natural ecosystem function where practicable.
 - Achieve ancillary ecosystem benefits with the northern baylands through partnerships and collaborative planning for future conditions.
- 10. Range of alternatives: Detail the range of alternatives considered, screening criteria, and screening process, including:
 - a. What types of alternatives were looked at? (Provide summary and reference document[s] with more detailed information)

Both roadway and non-roadway modal alternatives were considered. Non-road alternatives considered were floating bridge, ferries, passenger rail, auto train, bus, tunnel, and tolling.

Please refer to SR 37 PEL Study Report Chapter 5, Alternatives Identification.

b. How did you select the screening criteria and screening process?

Three levels of screening criteria were collaboratively developed and used to screen alternatives. Please refer to following SR 37 PEL Study Report chapters and appendices for details on the screening process:

- Chapter 6, Alternatives Evaluation Criteria
- Chapter 7, Alternatives Screening and Identification of the Preferred Alternative
- Appendix E, State Route 37 Corridor Planning and Environmental Linkages Study Alternatives Evaluation Criteria Memorandum
- Appendix F, State Route 37 Corridor Planning and Environmental Linkages Study Level
 1 Screening Report
- Appendix G, State Route 37 Corridor Planning and Environmental Linkages Study Level 2 Screening Report
- Appendix H, State Route 37 Corridor Planning and Environmental Linkages Study Level 3 Screening Report.
- For alternative(s) that were considered but not recommended for further evaluation, briefly summarize the reasons for eliminating the alternative(s). (During the initial screenings, this generally will focus on fatal flaws.)

Caltrans first proposed seven potential corridor alignments, and working groups added an eighth that was completely outside the future sea level rise inundation area. The PEL Study Team also developed potential modal choices (beyond roads) that could also be added to one or more of the various alignments as alternatives. Alignments were first evaluated for their potential to fulfill the identified purpose and need (Level 1 screening). Alignments that passed the Level 1 screening were recharacterized as alternatives and evaluated for how well they met key objectives related to design, environmental and ecological factors, traffic and transportation, and equity considerations (Level 2 screening). Two new alternatives were introduced during Level 2 screening, for a total of 10. Level 3 screening focused on important factors related to traffic, the environment, and feasibility but with a particular emphasis on tradeoffs between the benefits and impacts of each alternative. The Level 3 evaluation was intended to identify the alternative that would best fulfill the vision for the ultimate SR 37 corridor that had been collaboratively developed and refined by Caltrans, partners, and stakeholders over the course of the SR 37 PEL Study. SR 37 PEL Study Report Chapter 7 describes the preferred alternative, the rationale for selecting it, and the reasons for eliminating other alternatives.

c. Which alternatives should be carried forward into the NEPA/CEQA process and why?

Alternative 5, reconstructing the existing SR 37 corridor on a raised causeway with upgraded lanes, shoulders, and bicycle/pedestrian facilities, was selected as the preferred alternative in the SR 37 PEL Study and will be carried forward into the NEPA/CEQA process. Reasons for selecting Alternative 5 as the preferred alternative are described in the SR 37 PEL Study Report Chapter 7.

d. Did the public, stakeholders, and agencies have an opportunity to comment during this process?

Public, stakeholders, and agencies had multiple opportunities to comment during the alternative development, criteria development, and alternative selection process. Please refer to SR 27 PEL Study Report Chapters 2, 5, 6, and 7.

e. Were there unresolved issues with the public, stakeholders, and/or agencies?

The final details of implementation will continue to be discussed after the conclusion of the SR 37 PEL Study. Caltrans will continue its coordination with PEL Study partners like MTC and the four county transportation authorities.

Please refer to SR 37 PEL Study Report Chapter 8, Implementation Plan.

- 11. Planning assumptions and analytical methods:
 - a. What is the forecast/horizon year used in the PEL study?

The forecast year is 2130, based on projections of sea level rise.

b. What method was used for forecasting traffic volumes?

The source of preliminary traffic forecasts was MTC's *Plan Bay Area 2050* metropolitan transportation plan and its *Forecasting and Modeling Report* (both adopted October 2021).

MTC Travel Demand Model was used for the regional transportation plan and sustainable communities strategy.

Plan Bay Area compared 2015 to projected 2050 traffic conditions.

Model applied 'off the shelf'—limited sensitivity to induced travel effects, local study area traffic capacity constraints, visitor/interregional travel behavior.

Projected future vehicle miles traveled was estimated using the National Center for Sustainable Transportation's California Induced Travel Calculator.

SR 37 Travel Behavior & Transit Feasibility Study (2019) and Highway 37 Sears Point to Mare Island Improvement Project (2021) were also consulted.

Forecasting applications for project design/approval and environmental document will require additional model calibration and validation within the Study Area.

c. Are the planning assumptions and the corridor vision/purpose and need statement consistent with the long-range transportation plan/larger corridor study? Are the assumptions still valid?

The planning assumptions and corridor vision/purpose and need were developed in collaboration and with the input of metropolitan and regional transportation agencies to ensure consistency with their long-range plans. Ongoing collaboration will ensure that plans and assumptions are updated and remain valid.

d. What future year policy and/or data assumptions were used in the transportation planning process related to land use, economic development, transportation costs, and network expansion?

Торіс	Year/Data Assumptions
Land Use	Various – local/county general plan projections 2030–2040
Economic development	Various
Transportation costs	2022
Network expansion	Plan Bay Area 2050 model

- 12. For each resource or group of resources reviewed (wetlands, cultural, etc.), provide the following:
 - a. In the PEL study, what level of detail was used to review individual resources and what method of review was used?

Most resources assessments examined GIS data representing the alternatives and the relevant resource, regional planning documents, publicly available information and record repositories, zoning and land use maps, internal databases, sea level rise and

climate change projections, basin plans, regional transportation plans, and other desktop resources.

Please refer to SR 37 PEL Study Report Chapter 4, Existing Conditions.

b. Is this resource present in the area and what is the existing environmental condition for this resource?

Please refer to SR 37 PEL Study Report Chapter 4.

- c. What are the issues that need to be considered during the NEPA/CEQA process, including potential resource impacts and potential mitigation requirements (if known)?
 - ^a Sea level rise impacts on the transportation corridor and natural resources.
 - Impacts of alternatives on biological resources (endangered, threatened, specialstatus species, and species of concern and critical habitat; hydrological connectivity). Coordination will be required with the NMFS, USFWS, CDFW, and the RWQCB.
 - Tidal marsh and transition zones
 - Community impacts (e.g., public access, access and impacts on private and commercial properties, impacts on disadvantaged communities)
 - Stormwater facilities
 - Right-of-way acquisition, property acquisitions or displacements, conformance with applicable land use planning documents, and impacts on the surrounding existing land use and development
 - Traffic impacts
- d. Will the planning data provided need to be supplemented during the NEPA/CEQA process?

The planning data provide a solid foundation for an existing conditions analysis. All data was collected from available sources; for biological and wetland resources in particular, field studies will be needed to fully document conditions in the area. Similarly, field observations will be needed for such topics as cultural resources and hazardous materials.

13. List environmental resources you are aware of that were not reviewed in the PEL study and describe why.

All resources that would require NEPA/CEQA review were reviewed for the SR 37 PEL Study.

Coastal zone resources and wild and scenic rivers are not present in the study area and were not evaluated.

14. Were cumulative impacts considered in the PEL study? If yes, provide the information or reference where the analysis can be found.

Please refer to SR 37 PEL Study Report Chapter 8.

15. Describe any mitigation strategies discussed at the planning level that should be analyzed during the NEPA/CEQA process.

For several resource topics, particularly noise and vibration, the SR 37 PEL Study included conceptual mitigation (location/length of soundwalls, areas where noise mitigation may be required). As project plans are refined, this conceptual mitigation will need to be refined.

16. What needs to be done during the NEPA/CEQA process to make information from the PEL study available to the agencies and the public? Are there PEL study products which can be used or provided to agencies or the public during the NEPA/CEQA scoping process?

The SR 37 PEL Study Report and supporting documentation will be posted for public access on the Caltrans District 4 SR 37 Corridor website and on the Resilient 37 website maintained by SCTA.

17. Are there issues or risks for the NEPA/CEQA process and beyond that should be documented?

A key risk for the SR 37 corridor is the likelihood of sea level rise. Assumptions about sea level rise were drawn from the California Ocean Protection Council and BCDC. All sea level rise projections are potentially subject to revision as the science advances.

The SR 37 PEL Study contains extensive environmental background information but is not intended to serve on its own as a substitute for environmental analysis under NEPA or CEQA. However, the planning products resulting from the SR 37 PEL Study may be adopted during subsequent environmental review process in accordance with 23 United States Code (USC) 168(d)(4). In the environmental review process, consistent with 23 USC 168(c)(2), Caltrans and its partners may adopt or incorporate by reference analyses from the PEL, which may include: travel demand; regional development and growth; local land use, growth management, and development; population and employment; natural and built environmental effects, including the identification of resources of concern and potential direct, indirect, and cumulative effects on those resources; and mitigation needs for a proposed project, for program-level mitigation, and for potential effects that the lead agency determines are most effectively addressed at a regional or national program level.

Availability of funding as corridor plan projects move forward in future is always a risk. Caltrans has started a Risk Register for the SR 37 project (see SR 37 PEL Study Report Appendix N, *Risk Register*) that will be updated periodically throughout the Project Approval and Environmental Document (PA&ED) and project implementation phases.

18. Provide a table of identified projects and/or proposed phasing plan for corridor build out.

It is likely that the preferred alternative will be built in phases or a series of individual projects over time. Please refer to SR 37 PEL Study Report Chapter 8 for proposed project phasing.

19. Provide a list of what funding sources have been identified to fund projects from this PEL.

Potential funding opportunities may be focused on support for transit, freight, or highway improvements. Please refer to SR 37 PEL Study Report Chapter 8 for a list of potential funding sources.

Tolling is another potential funding source, primarily being considered by MTC in its capacity as the Bay Area Tolling Authority.