5401 Old Redwood Highway
Suite 200
Petaluma, CA 94954
Phone: 707-794-3330
Fax: 707-794-3037
www.sonomamarintrain.org

November 7, 2022

The Honorable Liane Randolph
Chair, California Air Resources Board
1001 I Street
Sacramento, CA 95811

RE: Proposed In-Use Locomotive Regulation

Chair Randolph:

On behalf of Sonoma-Marin Area Rail Transit District (SMART), I write today in response to the Proposed In-Use Locomotive Regulation. We incorporate the California Transit Association comment letter dated November 3, 2022, into our comments by reference, as well as the attached seven points of concern relevant to California's commuter rail properties.

SMART was created by the State of California in 2002 and is the public agency owner-operator of 95-miles of railroad track across Marin, Sonoma and Napa Counties. In 2008, a supermajority of voters in Marin and Sonoma passed a ¼ cent sales tax to seed fund the rebuild and modernization of the 70-mile mainline railroad. The sales tax is the primary fund source for the passenger rail operations that began in 2017 and is currently offering service at 38 weekday trips and 12 trips per weekend day along a 45-mile corridor. In 2021, the Surface Transportation Board approved SMART assuming short-line freight rail common carrier responsibilities on the corridor from a private operator (June 11, 2021, STB Docket 1310X). SMART is also constructing a non-motorized paved pathway within the railroad right-of-way and has a public-private partnership to build broadband capacity along the corridor as the railroad is reconstructed.

SMART's Mission Statement is "*We Connect Communities: SMART provides safe, reliable, and environmentally responsible transportation options.*" In 2010, five years before the U.S. Environmental Protection Agency (EPA) Tier IV standards became effective, SMART's Board of Directors awarded a contract to Sumitomo Corporation of America to design and manufacture an EPA Tier IV emissions-compliant, Federal Transit Administration (FTA) Buy America-compliant, and Federal

Railroad Administration (FRA) crash test and Positive Train Control (PTC) safety-compliant Diesel Multiple Unit fleet. The delivery of SMART's 18 vehicles began in late 2015 and the vehicles were not available to be used for revenue service until mid-2017, after testing and reliability issues had been addressed, with a fleet cost of $58 million.

SMART's first five years of passenger operations saw catastrophic fires, floods and an extended pandemic. Despite that, and despite the North Bay not having passenger rail services since the 1950s, SMART's new rail and pathway system is having great success:

- Ridership post-pandemic has recovered to 86% of pre-pandemic,
- 20% of riders bring their bicycles onboard for zero-emission first and last mile access to the SMART system,
- Average passenger trip length on the railroad has been between 22 and 25 miles in the first five years, and
- SMART's new Pathway counters documented 65,000 zero-emission bicycle and pedestrian trips across the 9 locations in the first month tracking the data.

SMART achieves these successes because of several factors and because the voters of the North Bay have supported investment in the public railroad. To succeed, transit systems need to be frequent, reliable and safe.

- **Frequent:** SMART, despite having a single-track system, serves destinations the full length of the corridor with frequencies that are encouraging people to try transit for the first time in their lives. SMART's 32-minute headways in each direction through the morning and evening hours is possible due to strategically placed double track and sufficient fleet capacity and reliability. SMART's 38 trip weekday schedule has identical frequency southbound and northbound and is possible to implement because each of SMART's two-car train sets operate 12.5 hours and over 360 miles per weekday without being pulled out of service. See attached service schedule.
- **Reliable:** SMART's most recent quarter of service had 98% on-time performance. SMART provides competitive travel times to Highway 101 and provides the only northbound morning and southbound evening transit commute service across the corridor.
- **Safe:** SMART's top priority is safety. SMART is FRA PTC compliant and has completed over 40,000 end-to-end trips, equating to over 1.8 million miles traveled, with zero PTC-preventable incidents. SMART's trains have Crash Energy Management elements for added occupant safety that has proven effective in real world incidents.

SMART's services are allowing the local jurisdictions in the North Bay to develop housing in a transit-oriented pattern for the first time since the 1950s and most housing, particularly affordable and workforce housing under development in the area, is being centered around SMART stations. As described in the *2016* *Urban Footprint* analysis completed for Sonoma County, SMART's arrival is allowing consideration of transit-oriented land use development pattern moving forward. Scenarios where maximum urban infill are achieved, largely around SMART stations, VMT will be reduced by 11% over other growth scenarios through 2040. That would equal a cumulative reduction of fuel use by 7 billion gallons. Without SMART's frequent, reliable and safe rail service, the North Bay will not be able to build with a transit-oriented infill footprint, creating desperately needed affordable and workforce housing.

SMART's Sales Tax Reauthorization: SMART's voter approved sales tax expires in 2029 and SMART's voters must reauthorize it for SMART to be able to continue operating passenger rail and pathway services and maintain the recent $700 million-plus investment in the corridor. SMART's Board is making every effort to complete the extension of the system from the current 45-miles of passenger rail operations to the full 70 miles, utilizing the entirety of the publicly owned SMART mainline railroad right of way. Ability to expand and provide service to Northern Sonoma County is an agency FTA Title VI concern as the area is home to five of the six federally recognized Tribes in the Bay Area. Several of the Tribes are on record through regional and state plans as stating SMART's full completion to Cloverdale, the ultimate endpoint along the 70-mile line, is a Tribal priority.

Extending north will require additional passenger fleet capacity to be able to maintain the current service schedule, to provide the longest trains possible within that schedule and to provide services over the additional 25 miles of track. Expansion of the system is included in the State Rail Plan (draft soon to be released), with completion to Cloverdale by 2032. As SMART acquires the resources to construct that expansion and support it with passenger rail vehicles including the possible acquisition of new locomotives, the proposed In-Use Locomotive Regulation could have devastating consequences for SMART's ability to complete the extension. With no FTA Buy America-compliant and FRA-approved zero-emission locomotive on the market for purchase, SMART may not be able to expand services. That may in turn hinder SMART's ability to make the case to the voters to reauthorize the critical sales tax to allow for continued operations of the existing SMART Rail and Pathway system.

SMART's East-West Railroad: SMART is also the owner of 25 miles of railroad between Novato in Marin County and American Canyon in Napa County, the Brazos Line. This is approximately 2/3 of the track connecting between SMART's mainline and the national rail network in Suisun in Solano County. In 2018, the State of California funded an engineering feasibility study of passenger rail services along this corridor and the results of that analysis can be found here: SMART Novato to Suisun City Passenger Rail Feasibility Study. Similar to the concerns regarding the extension of the mainline system to Cloverdale, any expansion of passenger services SMART's Brazos line would require additional fleet and acquisition of that fleet may be delayed until a product that meets FTA Buy America and FRA safety standards is available to procure.

SMART's Short-Line Freight Railroad: The SMART Board, in an effort to support businesses in the North Bay wishing to maintain or grow their businesses while minimizing their climate impact due to transportation requirements of the growth, assumed the short-line freight railroad service role on SMART's publicly owned railroad tracks. SMART's assumption of Common Carrier responsibilities in late 2021 and early 2022 along the corridor came with the assumption of maintenance and operations along the entirety of SMART's railroad. Previously the private contract operator was responsible for maintenance of railroad assets that were not also in use for passenger service. In late 2021, SMART also became the owner of a freight switcher locomotives that were not operating with sufficient reliability to provide service. When SMART took over operations of the freight rail services from the private contractor in Spring 2022, a locomotive had to be leased from the private market to meet common carrier responsibilities. SMART's freight services operate with a separate budget from passenger services and are not yet profitable.

The CARB proposed In-Use Locomotive Regulation as written may punish SMART for assuming freight responsibilities starting in July 2024 with payments into an escrow Spending Account for 2023 emissions. SMART is seeking every avenue possible to acquire the latest Tier IV technology locomotives sufficient to operate these new-to-SMART short line freight rail services. FRA grants identify locomotive useful life as up to 40 years. Even if SMART succeeds in securing yet-unidentified funds to purchase the necessary two-Tier IV locomotives to provide today's level of service reliably, those locomotives may not be delivered in time for SMART to meet the 2023-24 budget year deadline imposed by this regulation. No Zero-Emission FRA-approved locomotive is currently available for SMART to purchase.

Further, the proposed § 2478.7 Alternative Compliance Plan, Section C, States: *"ACP emission reductions shall be achieved at or within three miles of California railyard facilities or within three miles of railyard facilities or railroad tracks where locomotives operate in California."* SMART's freight railyard facilities and Brazos line tracks are located within environmentally sensitive wetlands and, as such, any projects to offset equivalent emissions may result in significant negative impacts to those marshlands.

Whether through the Spending Account or Alternative Compliance Plan path, any additional costs assigned to the SMART Freight Budget may jeopardize SMART's ability to continue operating freight rail services starting in Fiscal Year 2023-24.

Appendix D - DRAFT Environmental Analysis for the Proposed In-Use Locomotive Regulation: SMART is concerned regarding several impacts not sufficiently analyzed in the Draft Environmental Analysis for the Proposed In-Use Locomotive Regulation. These include impacts in the areas of (3) Air Quality, (4) Biological Resources, (8) Greenhouse Gas Emissions, (11) Land Use and Planning, (14) Population and Housing, (15) Public Services, (16) Recreation, (17) Transportation, (19) Utilities and Service Systems, and (20) Wildfire.

As stated earlier in this letter, SMART requires additional passenger rail equipment to be able to expand passenger services north on the SMART Mainline and east-west along the Brazos line. SMART is making every effort to expand SMART's rail and pathway system to provide our communities with efficient, low cost, less resource intensive transportation choices, while increasing access to economic opportunities for all. If SMART fails to achieve these expansion goals, the voters may fail to reauthorize SMART voter-approved ¼ cent sales tax. A first effort to reauthorize the sales tax was made in March 2020 and though 54% of voter approved the reauthorization, it was insufficient to meet the 2/3 required in California for this type of measure. Voters who did not support the reauthorization commonly cited that SMART had to make more progress on completing the full 70-mile rail and pathway system described in the original sales tax before they would support reauthorization.

This CARB In-Use Locomotive rule would require SMART to make several difficult choices that may jeopardize SMART's ability to continue operating.

- SMART cannot proceed with acquiring zero-emission FRA approved, Buy America-compliant locomotives to expand service north because no such product exists today.

- Until any new zero-emission product can provide reliability guarantees to maintain SMART's ability to run 38 weekday trips without dramatically expanding fleet, SMART cannot afford to procure the scale of fleet necessary to offset equipment that doesn't match our current fleet equipment reliability or better.
- SMART could proceed with expanding the rail and pathway system further north but would have to cut core service levels (frequency or train length/capacity) to accommodate the physical expansion.
- SMART can forgo any service capacity expansion, either core capacity expansion or geographic service expansion.

Failure to make significant progress on SMART's local voter endorsed scope jeopardizes SMART's sales tax reauthorization efforts and with that the ability to continue operating. If SMART ceases operating the Public Service of pathway, passenger and freight rail, due to the expiration of the 2008 sales tax, our communities will be forced into returning to the private automobile model of travel along the corridor for their trips to school, to work, to access health care and other services. Or they will simply not have access. This will eliminate the ability of local jurisdictions to development urgently needed housing in a transit-oriented manner, as the rail transit system around which the development is being organized would no longer be operating. This, in turn, would have significant negative impacts to the Appendix D categories of (3) Air Quality, (8) Greenhouse Gas Emissions, (11) Land Use and Planning, (14) Population and Housing, (15) Public Services, (16) Recreation, (17) Transportation, and likely others.

The Proposed Regulation's requirement that Alternative Compliance Plans include emission offset projects within 1-3 miles of railyards and tracks may create significant negative impacts to (4) Biological Resources along SMART's Brazos line and freight railyard at Schellville, a largely undeveloped wetland environment.

Additionally, SMART has recent direct experiences in the arenas of Utilities and Wildfire that contradict the analysis in *Appendix D - DRAFT Environmental Analysis for the Proposed In-Use Locomotive Regulation* sections (19) Utilities and Service Systems and (20) Wildfire.

Specifically, section *(19) Utilities and Service Systems* states "*the electricity for wayside power required to charge electric locomotives is anticipated to be supplied by local utility companies. Because of the size of the locomotives, it is not expected that the increase in electricity use would be so large that utility companies would have insufficient energy supply*".

Section *(20) Wildfires* states "*The Proposed Regulation would not exacerbate wildfire risks related to existing fire safety provisions and compliance with the California Department of Forestry and Fire Protection, the California Public Utilities Commission, and California Fire Code regulations for facilities related to manufacturing facilities and battery production/recycling. Thus, the Proposed Regulation would not result in a cumulatively considerable contribution to wildfire impacts*".

SMART has had to operate in extreme wildfire conditions multiple times during the first five

years of passenger service, including evacuation of the fleet twice and standing ready per California's Office of Emergency Services request, for population evacuation purposes. The

Proposed Rule Environmental Analysis regarding Utilities assumes that capacity exists to accommodate a zero-emission electric rail fleet. That capacity can be viewed as both baseline ability to power and systemic reliability. The north of SMART's 70-mile passenger rail and pathway corridor is rural and, as such, does not currently have the systemic capacity to accommodate SMART without further study and significant investment expense to create the baseline capacity. Regarding reliability, on multiple occasions local utility Power Safety Power Shutoffs have resulted in extended periods of no power, including 10 days in the north of SMART's corridor in 2019. These extended power outages require SMART to back up lack of electric power at rail grade crossings with portable generator equipment and would make powering of zero-emission electric fleet impossible. Until more analysis regarding future grid reliability in SMART's specific area is complete, it will be difficult to understand the cost and infrastructure requirements of this Proposed Rule.

The Proposed Rule Environmental Analysis regarding Wildfire examines only the impacts related to manufacturing facilities and not the impacts of the ruling on passenger rail emergency operation capabilities. This includes the need to evaluate the impacts on the ability of the passenger rail services to operate under extreme failure scenarios on the part of the utilities.

Next Steps: SMART agrees with CARB that continuing to deploy the cleanest technology available is important. To make it work for railroads, however, it has to be reliable when deployed and it will need to be implementable within the general parameters of the way the railroad operates.

We encourage CARB to modify the Proposed Rule's approach to the **Technology Assessment (Section 2478.5 (b)(1))** by moving that analysis earlier and re-evaluating that assessment more frequently than proposed. If the assessment is held in 2027 as proposed, with an implementation date of 2030 for passenger rail locomotives, there will not be sufficient time for railroads to react. Locomotive procurement for passenger rail services takes many years. SMART's fleet procurement was seven years until the rail cars were in revenue service, with FRA testing delays and service start delays due to technology failures with a relatively known technology product type. These timelines will likely be significantly longer for the new technology implementation of zero-emission locomotives.

We strongly urge CARB to partner with the public agency railroads to make progress developing zero emission locomotive products. This will be most effective and least harmful to the public services offered by our railroads if it is done through incentive programs and investment in advancing the analysis and necessary infrastructure improvements on the railroad wayside so that railroads are prepared to transition from day one of the availability of the zero-emission locomotive products. As the Proposed Rule stands now, it will simply penalize our public railroad agencies, each of which is working hard to advance technology while operating a reliable, safe and frequent transit service for Californians.

We look forward to working with you to further our mutual goals and CARB's mission to *"promote and protect public health, welfare, and ecological resources through effective reduction of air pollutants while recognizing and considering effects on the economy".*

The communities and voters we serve have the same mission as CARB and have invested their own money in the SMART rail and pathway system as a means of achieving those goals. Our voters have approved taxing themselves to protect open space, to enshrine growth boundaries around their cities, and to build and operate SMART's groundbreaking rail and pathway system.

Thank you for the opportunity to comment.

Sincerely,

Eddy Cumins
General Manager

Cc: SMART Board of Directors
Senator Mike McGuire
Senator Bill Dodd
Assemblymember Jim Wood
Assemblymember Marc Levine
Assemblymember Cecilia Aguiar-Curry
Michael Pimentel, California Transit Association

Attachments:
(1) California Commuter Railroads – CARB In-Use Locomotive Regulation Discussion Document
(2) SMART Service Schedule

California Commuter Rail Operators
CARB In-Use Locomotive Regulation
Discussion Document

CARB Proposed In-Use Locomotive Regulation

Key Points to Reduce Impacts on Public Operators

1. Ensure that public agencies are not held to a Spending Account or Useful-Life Requirement under any scenario as a means of further emissions reductions. Passenger railroads will commit to achieving the proposed locomotive emission reduction targets. However, mandatory spending accounts siphon critical operating funds needed by commuter rail agencies recovering from precipitous ridership declines due to the pandemic. Mandatory diversions of funding from operations and maintenance programs could jeopardize the safety and reliability of railroad operations. A CARB imposed useful life requirement for locomotives of 23 years will be significantly shorter than the federal 30-year life standard and could force agencies to repay federal funds if locomotives are retired early.
2. Provide a consistent 2035 zero emissions purchase date between freight and passenger rail agencies. The current regulation language imposes a 2030 date for passenger rail agencies and affords a 5-year delay for freight rail operators. Passenger rail only accounts for 7% of all locomotive NOx emissions and 5% of PM2.5 emissions from the sector. Passenger rail should not be held to a more stringent timeline than freight rail. 2035 gives the entire industry the needed time for the technology to develop. Independent industry experts expect commercially viable zero-emissions technologies in this sector over decades, not years.
3. Extend the period of approval for an Alternative Compliance Plan (ACP) – preferably for no less than 15 years. The ACP should also account for early emissions-reduction actions, technology adoptions, and provide credit for reductions in Vehicle Miles Travelled (VMT) and emissions that are facilitated through public rail service. A longer-term ACP and accounting for VMT/emissions reductions through passenger rail service will provide greater certainty for operators and capture the environmental benefits accrued through service.
4. Include consistent offramps afforded to other public transit operators under the Innovative Clean Transit Rule (ICT) – including delayed implementation for financial emergencies and the availability of equipment that meets required operations and maintenance cycles.
5. Ensure that a neutral and independent market analysis is completed by an informed third party, such as the Caltrans Division of Rail and Mass Transportation. The SRIA omitted and misrepresented critical information relating to the cost and availability of zero-emissions technology.
6. Reduce burdensome, onerous, and technically infeasible reporting requirements for public agencies. Much of the data requested, such as idling, the use of ground power and engine shutdowns are not automated. These data points would need to be primarily collected in a labor intensive manual system that goes beyond the capacity of existing staff and technical resources.
7. Provide a commensurate level of incentive funding required for the development of locomotive technologies as was provided to other public transit modes. There are mature commercial markets for hybrid and zero-emissions buses and personal vehicles in part because of decades of significant public investment at the federal and state levels in alternative technologies in these sectors, in partnership with private industry. Rail will require the time and incentive pilot funding afforded to the development of other zero-emissions technologies.

Advocacy Themes

1. *Shared Goals*: Operators are united in their shared goal to accelerate and deploy zero-emissions technology as soon as feasible.
2. *Timeline and Incentive Funding*: On-road hybrid and zero-emissions technologies have been developed and deployed for decades. Zero-emissions locomotives will require time and public incentives to achieve the same market availability.
3. *Safety*: Zero-emission multiple units (ZEMUs) have not yet been approved for pilot service by the FRA and there are currently no non-electrified zero-emissions locomotives that are FRA approved for public passenger rail service.
4. *Emissions Framework*: The emissions framework that underpins the regulation disincentivizes public operators from providing robust and frequent service levels. The framework penalizes the operations of Tier 4 locomotives with renewable petroleum-free fuel – which are the cleanest, most fuel-efficient diesel locomotives available today. Higher service levels that increase fuel consumption further financially penalizes operators. The state is inversely incentivizing operators to delay or forgo increasing service – which further increases statewide VMT and emissions from personal vehicles.
5. *Public Benefits*: The unintended impacts on public agencies will negatively curtail the public benefits provided by operating rail service. Operators would likely be unable to absorb the anticipated costs of the penalty provision without potentially impacting ridership, service, and/or public agency budgets, particularly considering steep ongoing COVID-19 related ridership declines at a time when the State is pushing for more mass transit to reduce greenhouse gas emissions.

Alternative Solutions

1. An independent market assessment and analysis should be completed prior to approving regulation language. This study will inform the timeline, incentives, and technologies necessary to meet the needs of operators across the state.
2. A funded pilot phase should be implemented before penalties or purchase requirements are imposed. Such pilots will accelerate the development of technologies faster than will be possible with operators pursuing independently.
3. A purchase requirement and fleet management framework with the appropriate timelines would better align shared zero-emissions goals with the realities of market availability, public procurements, and complex transition plans.

SONOMA-MARIN SMART AREA RAIL TRANSIT

Train Schedule effective October 3, 2022

Horario de Trens en efecto el 3 de Octubre

SOUTHBOUND WEEKDAYS - Sonoma County Airport to Larkspur

AM PM

DIRECCIÓN SUR EN DIAS LABORALES - Aeropuerto del Condado de Sonoma a Larkspur

TRIP NUMBER / VIAJE DE TREN	1	3	5	7	9	11	13	15	17	19	21	23	25	27	29	31	33	35	37
Sonoma County Airport	4:39	5:02	6:06	6:38	7:10	7:42	8:14	9:18	10:22	12:45	1:17	2:21	2:53	3:25	3:57	5:01	5:33	6:05	6:37
Santa Rosa North	4:46	5:09	6:13	6:45	7:17	7:49	8:21	9:25	10:29	12:52	1:24	2:28	3:00	3:32	4:04	5:08	5:40	6:12	6:44
Santa Rosa Downtown	4:50	5:13	6:17	6:49	7:21	7:53	8:25	9:29	10:33	12:56	1:28	2:32	3:04	3:36	4:08	5:12	5:44	6:16	6:48
Rohnert Park	4:58	5:21	6:25	6:57	7:29	8:01	8:33	9:37	10:41	1:04	1:36	2:40	3:12	3:44	4:16	5:20	5:52	6:24	6:56
Cotati	5:01	5:24	6:28	7:00	7:32	8:04	8:36	9:40	10:44	1:07	1:39	2:43	3:15	3:47	4:19	5:23	5:55	6:27	6:59
Petaluma Downtown	5:16	5:39	6:43	7:15	7:47	8:19	8:51	9:55	10:59	1:22	1:54	2:58	3:30	4:02	4:34	5:38	6:10	6:42	7:14
Novato San Marin	5:28	5:51	6:55	7:27	7:59	8:31	9:03	10:07	11:11	1:34	2:06	3:10	3:42	4:14	4:46	5:50	6:22	6:54	7:26
Novato Downtown	5:31	5:54	6:58	7:30	8:02	8:34	9:06	10:10	11:14	1:37	2:09	3:13	3:45	4:17	4:49	5:53	6:25	6:57	7:29
Novato Hamilton	5:39	6:02	7:06	7:38	8:10	8:42	9:14	10:18	11:22	1:45	2:17	3:21	3:53	4:25	4:57	6:01	6:33	7:05	7:37
Marin Civic Center	5:45	6:08	7:12	7:44	8:16	8:48	9:20	10:24	11:28	1:51	2:23	3:27	3:59	4:31	5:03	6:07	6:39	7:11	7:43
San Rafael	5:51	6:14	7:18	7:50	8:22	8:54	9:26	10:30	11:34	1:57	2:29	3:33	4:05	4:37	5:09	6:13	6:45	7:17	7:49
Larkspur	5:58	6:21	7:25	7:57	8:29	9:01	9:33	10:37	11:41	2:04	2:36	3:40	4:12	4:44	5:16	6:20	6:52	7:24	7:56
GG Ferry **departs from** Larkspur GG Ferry **sale de** Larkspur	6:40	6:40	7:55		8:50		10:00		12:10		3:15		4:40	5:25	6:10		7:30		
GG Ferry **arrives in** San Francisco GG Ferry **llega a** San Francisco	7:10	7:10	8:25		9:25		10:35		12:45		3:50		5:15	5:55	6:40		8:05		

NORTHBOUND WEEKDAYS - Larkspur to Sonoma County Airport

AM PM

DIRECCIÓN NORTE EN DIAS LABORALES - Larkspur al Aeropuerto del Condado de Sonoma

GG Ferry **departs from** San Francisco GG Ferry **sale de** San Francisco				7:15	8:10	8:45	9:45	10:45	12:55		2:35			4:00	4:45	5:30	6:05	6:50	
GG Ferry **arrives in** Larkspur GG Ferry **llega a** Larkspur				7:45	8:40	9:20	10:20	11:20	1:30		3:05			4:30	5:15	6:00	6:35	7:20	
TRIP NUMBER / VIAJE DE TREN	2	4	6	8	10	12	14	16	18	20	22	24	26	28	30	32	34	36	38
Larkspur	6:08	6:40	7:44	8:16	9:20	9:52	10:56	12:15	2:23	2:55	3:27	3:59	4:31	5:03	5:35	6:39	7:11	7:43	8:06
San Rafael	6:15	6:47	7:51	8:23	9:27	9:59	11:03	12:22	2:30	3:02	3:34	4:06	4:38	5:10	5:42	6:46	7:18	7:50	8:13
Marin Civic Center	6:20	6:52	7:56	8:28	9:32	10:04	11:08	12:27	2:35	3:07	3:39	4:11	4:43	5:15	5:47	6:51	7:23	7:55	8:18
Novato Hamilton	6:26	6:58	8:02	8:34	9:38	10:10	11:14	12:33	2:41	3:13	3:45	4:17	4:49	5:21	5:53	6:57	7:29	8:01	8:24
Novato Downtown	6:32	7:04	8:08	8:40	9:44	10:16	11:20	12:39	2:47	3:19	3:51	4:23	4:55	5:27	5:59	7:03	7:35	8:07	8:30
Novato San Marin	6:35	7:07	8:11	8:43	9:47	10:19	11:23	12:42	2:50	3:22	3:54	4:26	4:58	5:30	6:02	7:06	7:38	8:10	8:33
Petaluma Downtown	6:48	7:20	8:24	8:56	10:00	10:32	11:36	12:55	3:03	3:35	4:07	4:39	5:11	5:43	6:15	7:19	7:51	8:23	8:46
Cotati	7:01	7:33	8:37	9:09	10:13	10:45	11:49	1:08	3:16	3:48	4:20	4:52	5:24	5:56	6:28	7:32	8:04	8:36	8:59
Rohnert Park	7:05	7:37	8:41	9:13	10:17	10:49	11:53	1:12	3:20	3:52	4:24	4:56	5:28	6:00	6:32	7:36	8:08	8:40	9:03
Santa Rosa Downtown	7:13	7:45	8:49	9:21	10:25	10:57	12:01	1:20	3:28	4:00	4:32	5:04	5:36	6:08	6:40	7:44	8:16	8:48	9:11
Santa Rosa North	7:17	7:49	8:53	9:25	10:29	11:01	12:05	1:24	3:32	4:04	4:36	5:08	5:40	6:12	6:44	7:48	8:20	8:52	9:15
Sonoma County Airport	7:23	7:55	8:59	9:31	10:35	11:07	12:11	1:30	3:38	4:10	4:42	5:14	5:46	6:18	6:50	7:54	8:26	8:58	9:21

SOUTHBOUND WEEKENDS & HOLIDAYS

DIRECCIÓN SUR en Fin de Semana y Dias Festivos

TRIP NUMBER / VIAJE DE TREN	1	3	5	7	9	11
Sonoma County Airport	7:36	9:31	11:51	1:41	3:36	5:54
Santa Rosa North	7:43	9:38	11:58	1:48	3:43	6:01
Santa Rosa Downtown	7:47	9:42	12:02	1:52	3:47	6:05
Rohnert Park	7:55	9:50	12:10	2:00	3:55	6:13
Cotati	7:58	9:53	12:13	2:03	3:58	6:16
Petaluma Downtown	8:13	10:08	12:28	2:18	4:13	6:31
Novato San Marin	8:25	10:20	12:40	2:30	4:25	6:43
Novato Downtown	8:28	10:23	12:43	2:33	4:28	6:46
Novato Hamilton	8:36	10:31	12:51	2:41	4:36	6:54
Marin Civic Center	8:42	10:37	12:57	2:47	4:42	7:00
San Rafael	8:48	10:43	1:03	2:53	4:48	7:06
Larkspur	8:55	10:50	1:10	3:00	4:55	7:13
GG Ferry **departs from** Larkspur GG Ferry **sale de** Larkspur	9:20	11:10	1:35		5:20	
GG Ferry **arrives in** San Francisco GG Ferry **llega a** San Francisco	10:20	12:10	2:30		6:20	

NORTHBOUND WEEKENDS & HOLIDAYS

DIRECCIÓN NORTE en Fin de Semana y Dias Festivos

GG Ferry **departs from** San Francisco GG Ferry **sale de** San Francisco			12:20	2:40	4:45	6:00
GG Ferry **arrives in** Larkspur GG Ferry **llega a** Larkspur			1:20	3:40	6:00	7:00
TRIP NUMBER / VIAJE DE TREN	2	4	6	8	10	12
Larkspur	9:30	11:18	1:40	4:07	6:25	7:30
San Rafael	9:38	11:26	1:48	4:15	6:33	7:38
Marin Civic Center	9:43	11:31	1:53	4:20	6:38	7:43
Novato Hamilton	9:50	11:38	2:00	4:27	6:45	7:50
Novato Downtown	9:56	11:44	2:06	4:33	6:51	7:56
Novato San Marin	9:59	11:47	2:09	4:36	6:54	7:59
Petaluma Downtown	10:12	12:00	2:22	4:49	7:07	8:12
Cotati	10:25	12:13	2:35	5:02	7:20	8:25
Rohnert Park	10:29	12:17	2:39	5:06	7:24	8:29
Santa Rosa Downtown	10:37	12:25	2:47	5:14	7:32	8:37
Santa Rosa North	10:41	12:29	2:51	5:18	7:36	8:41
Sonoma County Airport	10:47	12:35	2:57	5:24	7:42	8:47

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