

## Attachment A: Public Comment Summary and Responses

The Environmental Assessment (EA), prepared pursuant to the National Environmental Policy Act (NEPA), was available for public review from December 10, 2024, to January 10, 2025. Forty-five public and agency comments were received: three letters via email, five emailed comments, and 37 online comment forms. No comments were received via postal mail.

Three emailed letters were received from public agencies: the California Public Utilities Commission (CPUC), San Joaquin Valley Air Pollution Control District, and the City of Dublin. The comment letters received from the CPUC and the San Joaquin Valley Air Pollution Control District were dated and received on January 21, 2025, after the close of the EA public comment period; however, they are addressed below.

In general, the comments included, but were not limited to the following: alternatives analysis (including station locations and vehicle technologies, among others); NEPA class of action (i.e., EA or Environmental Impact Statement [EIS]); statements of support for the Project; statements not supporting the Project; and concerns related to:

- Aesthetics and Visual Resources
- Air Quality
- Alternatives
- Design
- Biological Resources
- Cultural and Historic Resources
- Energy
- Farmlands
- Floodplains
- Hazardous Materials
- Noise and Vibration
- Public Outreach Efforts
- Purpose and Need
- Safety
- Transportation and Traffic
- Water Quality, Supply, and Drainage

Table A-1 provides a summary of comments received, the commenter, and comment topics. Corresponding responses immediately follow Table A-1. The responses to the agencies and organizations and the various comment topics are provided below. Comments related to the environmental documents prepared pursuant to the California Environmental Quality Act (CEQA) and the role and authority of Tri-Valley – San Joaquin Valley Regional Rail Authority (TVSJVRRA) are considered separately from NEPA. The EA incorporates by reference the environmental documents prepared pursuant to CEQA. The responses below include clarifications to the EA in response to public and agency comments. The clarifications in response to comments are minor and do not change the analysis or the findings in the EA. Referenced Avoidance, Minimization, and Mitigation Measures (referred to as AMMs) may be found in the Finding of No Significant Impact (FONSI) Attachment D, Environmental Commitments.

**Table A-1. Valley Link Rail Project EA Summary of Comments**

<b>Comment ID</b>	<b>Commenter Name</b>	<b>Comment Topic(s)</b>	<b>Date Received</b>
<b>State Agencies</b>			
S-1	California Public Utilities Commission	Applicable State Requirements for New Rail Crossings	January 21, 2025
<b>Regional Agencies</b>			
R-1	San Joaquin Valley Air Pollution Control District	Applicable District Rules and Regulations	January 21, 2025
<b>Local Agencies</b>			
L-1	City of Dublin	Coordination with City/City Plans and Standards, Aesthetics, Land Use and Property Acquisitions, Noise and Vibration, Transportation, Utilities, 15% Design Plans	January 10, 2025
<b>Organizations</b>			
O-1	Mission Peak Conservancy – Kelly Abreau	Alternatives Analysis, Class of Action/Level of NEPA Analysis	January 10, 2025
O-2	Transportation Solutions Defense and Education Fund (TRANSDEF) – David Schonbrunn, President	Class of Action/Level of NEPA Analysis, Purpose and Need, Alternatives Analysis, Design, Impacts Related to Aesthetics/Views, Floodplains, Greenhouse Gas (GHG) Emissions, Energy, Hazardous Materials, Transportation and Traffic	January 10, 2025
<b>Individuals</b>			
I-1	Prabhakar [No Last Name]	Project Support	December 11, 2024
I-2	Erik Bjorklund	Design (Consideration of Potential Future Truck Climbing Lane, Southfront Road Station), Aesthetics/Views	December 12, 2024
I-3	Cheryl Perry	Aesthetics/Views. Not supportive of the Project.	December 28, 2024
I-4	Jessica [No Last Name]	Aesthetics/Views	December 28, 2024
I-5	Anonymous	Other	December 28, 2024
I-6	Allison Bean	Aesthetics/Views	December 28, 2024
I-7	Katie Kavanagh	Request for Information	December 28, 2024
I-8	Taylor Moriarty	Other	December 28, 2024
I-9	Danell Schmehl	Non-Support	December 28, 2024
I-10	Preston [No Last Name]	Non-Support	December 28, 2024
I-11	Cynthia [No Last Name]	Aesthetics/Views	December 28, 2024

<b>Comment ID</b>	<b>Commenter Name</b>	<b>Comment Topic(s)</b>	<b>Date Received</b>
I-12	Denys Zilm	Project Support	December 28, 2024
I-13	Nipun Gunawardena	Project Support	December 28, 2024
I-14	Richard Hadley	Project Support	December 28, 2024
I-15	Lisa Holmes Elkihel	Project Support, Aesthetics/Views	December 28, 2024
I-16	Gerald Cauthen	Ridership	December 28, 2024
I-17	Monica Espinoza	Project Support	December 28, 2024
I-18	Brian McGehee	Non-Support, Aesthetics/Views	December 28, 2024
I-19	Melanie Musto	Project Support, Aesthetics/Views	December 28, 2024
I-20	Debby Leeds	Aesthetics/Views	December 28, 2024
I-21	Mark Tarte	Aesthetics/Views	December 29, 2024
I-22	Cheryl Remillard	Project Support	December 30, 2024
I-23	Joseph Mauro	Project Support	December 30, 2024
I-24	Denise Huerta	Safety	December 30, 2024
I-25	Vaishik Kota	Aesthetics/Views	December 30, 2024
I-26	Blessilda Marx	Project Support	December 30, 2024
I-27	Terri Stearman	Project Support	December 30, 2024
I-28	Trishia Ybarreche	Project Support/Aesthetics	December 30, 2024
I-29	Kelly Ceglio	Aesthetics/Views	December 30, 2024
I-30	Amanda Petros	Aesthetics/Views	December 31, 2024
I-31	Melanie Flores	Aesthetics/Views	December 31, 2024
I-32	Aidan Langston	Other (Regarding CEQA Content)	January 1, 2025
I-33	Moira Cunningham	Non-Support, Aesthetics	January 1, 2025
I-34	Lawrence Paul	Other	January 2, 2025
I-35	Becky Schmidt	Non-Support, Crime, Traffic, Community Development	January 3, 2025
I-36	Frankie Soneham	Non-Support	January 3, 2025
I-37	Karthik [No Last Name]	Project Support	January 5, 2025
I-38	Anale Chris Cunningham	Public Outreach, Traffic, Noise and Vibration, Safety and Security, Water Quality, Supply, and Drainage	January 6, 2025
I-39	Chris [No Last Name]	Project Support, Aesthetics/Views	January 6, 2025
I-40	Jason Bezis [Law Offices of Jason A. Bezis]	Class of Action/Level of NEPA Analysis, Alternatives Analysis, Aesthetics/Views, Biological Resources, Cultural Resources	January 10, 2025

## Responses to Comments

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### *California Public Utilities Commission*

The CPUC provided a comment letter via email referencing state and federal requirements for nearby rail crossings and tracks. They provided reference links to the CPUC General Orders and Public Utilities Code. The TVSJVRRRA will coordinate with CPUC and comply with the applicable state and federal requirements for design and permits.

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### *San Joaquin Valley Air Pollution Control District*

The San Joaquin Valley Air Pollution Control District provided a comment letter via email regarding compliance with various District rules and regulations and requested that the comments be provided to the project proponent. As the project proponent, TVSJVRRRA will comply with District Rules, as applicable, including the following District Rules:

- 2010 and 2201 (Air Quality Permitting for Stationary Sources)
- 9510 (Indirect Source Review)
- 4002 (National Emissions Standards for Hazardous Air Pollutants)
- 4601 (Architectural Coatings)
- 4102 (Nuisance)
- 4641 (Cutback, Slow Cure, and Emulsified Asphalt, Paving and Maintenance Operations)

The TVSJVRRRA anticipates being exempt from Rule 9410 (Employer Based Trip Reduction) during both construction and operation of the Build Alternative. Less than 100 full-time employees at any worksite are anticipated during construction, and as noted in Rule 9410, excluded employees include “Field construction workers who report directly to work at temporary construction sites.”

Under the direction of the TVSJVRRRA, the construction contractor will implement control measures at construction and staging areas to reduce construction-related fugitive dust. Compliance with Regulation VIII (Fugitive PM10 Prohibitions) is incorporated in AMM AQ-3: Implement Fugitive Dust Controls during Construction as shown in the Environmental Commitments (see FONSI Attachment D, Environmental Commitments).

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### *City of Dublin*

The City of Dublin requested information and clarifications on the EA as well as measures regarding: right-of-way acquisition, coordination for Interstate 580 (I-580) interchange improvements, the Transportation Management Plan (TMP) and maintenance of access, and utilities. The letter noted the need for adherence to City standards; requested additional coordination with the City and other agencies; and requested consideration of off-site bicycle and pedestrian improvements. The TVSJVRRRA considered the comments by the City and will coordinate with the City and other agencies for design.

The updated roadway network will be included in the final design plans. It does not change the analysis or the findings in the EA.

Visual and construction impacts are analyzed in the EA Chapter 3, Affected Environment and Environmental Consequences, and summarized in the EA Executive Summary (Table ES-1: Summary of Build Alternative Impacts and Mitigation Measures). Preliminary right-of-way

requirements may be found in the EA Appendix B, Proposed Right-of-Way (Table B-1: Preliminary Right-of-Way). Property acquisition requirements will be refined during final design.

The TVSJVRRRA will coordinate with the City of Dublin for outreach to the public and property owners; approvals for permits, construction easements, and encroachments as necessary; and review of Project design within Dublin. The TVSJVRRRA will also coordinate with the City of Dublin, the California Department of Transportation (Caltrans), and the Alameda County Transportation Commission for I-580 interchange improvements at Hopyard Road/Dougherty Road, Hacienda Drive, Tassajara Road/Santa Rita Road, and Fallon Road/El Charro Road as well as other projects in the project area. Alterations to existing transportation facilities will adhere to applicable City design and safety standards. The design review with the City of Dublin will consider consistency with City adopted plans.

AMM TRA-1 includes the following text (emphasis added): "The Authority will coordinate with the California Highway Patrol, [Bay Area Rapid Transit] BART, Caltrans, local transit providers, and public works and transportation departments of local jurisdictions..." The City of Dublin will be included among the agencies with which TVSJVRRRA will coordinate on the development and implementation of the TMP. As further detailed in AMM TRA-1, the TMP will include the implementation of "traffic control measures to minimize traffic conflicts for all roadway users." This includes the adjacent properties described in the comment. In addition, the TMP will describe safety measures for motorists, transit vehicles, bicyclists, and pedestrians to ensure safe travel through construction zones. The TMP will also consider future transportation facility improvements in the project area.

Noise Receiver I.D. 09-01 is located within unincorporated Alameda County. The TVSJVRRRA acknowledges that the referenced receivers—shown in the EA Appendix G, Noise and Vibration (Table G-1: Operational Noise Analysis – Detailed Results and Impact Conclusions [Receiver ID R-LT-15])—are located in the City of Dublin and unincorporated Alameda County.

The TVSJVRRRA acknowledges the City of Dublin as a storm drain utility owner. As described in the EA, Section 3.15.2, [Utilities] Environmental Consequences, where the Build Alternative would conflict with utilities, protection-in-place is the method of choice because it is less disruptive to streets and utility services. However, if a utility mainline conflicts with any temporary engineering, permanent structure, or final roadway configuration, relocation of the utility line would be required. All utility relocations would be coordinated with the utility owner and would be designed and constructed in accordance with applicable provisions set forth by uniform codes, city ordinances, and public works standards, including those adopted by the City of Dublin.

The TVSJVRRRA appreciates the City's review and comments on the 15% Preliminary Conceptual Design Plans. City of Dublin jurisdiction and areas of Alameda County limits will be reflected in final design plans. The TVSJVRRRA will continue to coordinate with the City of Dublin on access to culverts, maintenance of project retaining walls, land use, right-of-way and easement acquisition, City property, on-street parking, access, proposed bike path on Altamirano Avenue, future improvements to the I-580 interchanges, utilities, and other project coordination

topics. As discussed in the EA, Section 3.14, Transportation and Traffic, and in AMM TRA-3, the Project includes efforts to contain and minimize disruption to the existing BART service during construction of the Build Alternative. Consistent with the recommendation from the City, the TVSJVRRRA will coordinate with both the Livermore Amador Valley Transit Authority and the City of Dublin regarding bus services. In addition, coordination with the Alameda County Transportation Commission will occur on the improvements that will be parallel to and in the vicinity of the Dublin Boulevard Extension Project.

In the EA, Section 3.14.1.3, Bicycle and Pedestrian Facilities, the Build Alternative includes improvements to roadway segments and intersections adjacent to proposed stations as needed to provide adequate multimodal access, including crosswalks, pedestrian beacons, and sidewalks. The Build Alternative would not impact the limited existing bicycle and pedestrian facilities in the project area since roadway improvements (other than the realignment of Southfront Road) would be limited to new driveways. The realignment of Southfront Road would include new sidewalks where none currently exist. Offsite improvements to bicycle and pedestrian facilities are beyond the scope of the Project. AMM TRA-1 and AMM TRA-2 include safety measures for bicyclists and pedestrians to ensure safe travel through construction zones and limiting sidewalk and bikeway closures.

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*Mission Peak Conservancy / Kelly Abreu*

The commenter provided an email with various questions and comments regarding the analysis of Zero-Emission Multiple Unit (ZEMU)/Battery Electric Multiple Unit (BEMU) technology and hydrogen versus battery-electric technologies, as well as the opinion that an EIS is warranted.

Refer to the response related to Alternatives.

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*TRANSDEF / David Schonbrunn*

The commenter discussed the following topics: the need for the preparation of an EIS; overall merit of the Project; responsibility and jurisdiction of TVSJVRRRA; alternatives (including the elimination of the Iron Horse Trail Alternative, vehicle technology, and specific details regarding the Dublin/Pleasanton Station, Isabel Station, the support facilities, and connections to BART); and resource analyses or findings for energy, floodplains, GHG, hazardous materials, transportation and traffic, construction impacts, and aesthetics/visual impacts. Headings used within the commenter's letter have been retained within the following response. Bracketed numbers below indicate page numbers of the EA that the commenter referenced in their comment letter.

[Comment 1-4, 1-5] The commenter's support for the Iron Horse Trail Alternative is acknowledged. (See Alternatives section below for responses related to alternatives).

[Impact to Interstate 580 (I-580)] The median of I-580 would require reconfiguration to accommodate the alignment, station platform, and other Project features. The TVSJVRRRA is coordinating the design with Caltrans and will continue to coordinate with them for final design. The EA, Section 2.2.5, Construction Activities and Methods, describes potential construction activities required for the Build Alternative, including those related to I-580. These activities and their related impacts were considered as part of the Build Alternative and are reflected in the

impact analyses and discussions throughout the EA Chapter 3, Affected Environment and Environmental Consequences, as well as corresponding avoidance, minimization, and mitigation measures.

[Comment 2-11] Any typical intermodal transfer scenario involves movement between platforms, often using elevators, stairs, and/or escalators, plus walking (or rolling) using overpasses or underpasses. Examples in the Bay Area include intermodal transfers between BART and Amtrak trains at the Richmond and Coliseum Stations, between BART and Caltrain at the Millbrae Station, between BART and Santa Clara Valley Transportation Authority light rail transit trains at the Milpitas Station, between ferries and buses and streetcars at the San Francisco Ferry Building, and between BART and SF Muni at numerous San Francisco BART stations. These are not deterrents for riders traveling and transferring on commuter rail systems and connecting to regional heavy or light rail systems.

[Comment 2-11, 2-13] It is acknowledged that the commenter feels that few future housing units, parks, offices, and retail are within walking distance of the station and their perspective on the relationship of the Project and development in Livermore. The pedestrian bridge from the Isabel Station parking lot to the station platform is shown in the EA, Section 2.2.2.2, Isabel Station (Figure 2.2-10: Isabel Station). The 15% Preliminary Conceptual Design Plans, including alignment, stations, and crossovers (such as at Greenville Road), are available on the project website at [www.getvalleylinked.com](http://www.getvalleylinked.com). The length of the pedestrian bridge is subject to refinement during final design.

[Comment 2-17] See response to Design (Operations and Maintenance Facilities).

[Comment 2-20, 2-21] The EA, Section 2.2.3.3, Tracy Operations and Maintenance Facility/Operations Support Site, describes the Tracy Operations and Maintenance Facility/Operations Support Site (OMF/OSS). The OMF/OSS would accommodate heavy maintenance vehicle and component rebuilds, vehicle maintenance (for example, if a train vehicle was damaged), buildings and stations maintenance, warehouse storage, and a backup control center. The trains would be transported to the OMF/OSS on an as-needed basis. Similar operations occur at the Hudson-Bergen Light Rail Maintenance Facility in New Jersey and the TriMet Ruby Junction facility in Portland.

[Comment 2-22] The comment is acknowledged. (See also responses on Alternatives).

[Comment 3-30] Refer to the response related to Floodplains.

[Comment 1-3] Refer to the response related to Purpose and Need.

[Comment 1-4, 1-5] The Project Purpose and Need was developed with substantial public and stakeholder input. Refer to the EA, Section 1.1.2, Project Planning and the California Environmental Quality Act.

[Comment 1-5] As discussed in the EA, Section 3.12, Land Use and Property Acquisitions, the analysis considers applicable regional and local land use plans.

[Comment 1-6] The Project corridor crosses Alameda County and San Joaquin County. Population projections in the EA for Alameda County were taken from Plan Bay Area 2040. Later, the Association of Bay Area Governments and Metropolitan Transportation Commission adopted the Plan Bay Area 2050. Projections for San Joaquin County were developed by the San Joaquin Council of Governments. The projections for Alameda County from Plan Bay Area 2040 are not substantially different than projections from Plan Bay Area 2050. In San Joaquin County, the January 2025 San Joaquin Council of Governments Draft Demographic and Employment 2040 population forecast is not substantially different than the data referenced in the EA. The forecasts for Alameda County and San Joaquin County do not change the overall Project assumptions or impact findings.

[Comment 1-7, 1-8] Information on traffic and accidents may be found in the Interstate 580 and Interstate 205 Roadside Safety Improvement Project Initial Study with Negative Declaration (Caltrans 2020)<sup>1</sup>, which is referenced in EA Section 1.3.3, Need for Safe Travel Options through the Corridor.

[Comment 1-8] The support for a bus-only lane alternative is acknowledged. See also the response regarding Alternatives (Bus/Bus Rapid Transit with Managed Lanes).

[Comment 1-9] The analysis described in the EA, Section 3.4, Air Quality, examines both greenhouse gas (GHG) emissions and climate pollutants. Air quality affects all populations and communities.

[Comment 2-1] See the response regarding Alternatives.

[Comment 2-1] The reasonably foreseeable network accounted for future projects in both Alameda County and San Joaquin County, including but not limited to those identified in Plan Bay Area long-range transportation plan and the San Joaquin Council of Governments Regional Transportation Plan and Sustainable Communities Strategy (see the EA, Section 2.1, No Build Alternative).

[Comment 2-11, 2-12] It is acknowledged that the commenter feels that the transfers would not be seamless.

[Comment 2-11, 2-13] It is acknowledged that the commenter feels that few future housing units, parks, offices, and retail are within walking distance of the station.

[Comment 2-14, 2-15] Refer to response [2-11, 2-13] above.

[Comment 2-22] Refer to the response to Alternatives (Hydrogen-powered Trains and Alternative Fuels).

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<sup>1</sup> Caltrans. 2020. *Interstate 580 and Interstate 205 Roadside Safety Improvement Project Initial Study with Negative Declaration*. California Department of Transportation. June 2020. [https://dot.ca.gov/-/media/dot-media/district-4/documents/d4-environmental-docs/580-and-205-roadside-safety-improvement/4j940-roadside-safety-improvement-project\\_fed\\_06-19-20\\_ada.pdf](https://dot.ca.gov/-/media/dot-media/district-4/documents/d4-environmental-docs/580-and-205-roadside-safety-improvement/4j940-roadside-safety-improvement-project_fed_06-19-20_ada.pdf).

[Comment 2-23] See response to Transportation and Traffic.

[Comment 3-1] Energy impacts were analyzed for the Build Alternative and documented in the Valley Link Rail Project Energy Technical Report (prepared under separate cover).

[Comment 3-33] It is acknowledged that commenter feels that the hydrologic record is no longer adequate evidence of safety from floods.

[Comment 3-29] Refer to response to Alternatives (Hydrogen-powered Trains and Alternative Fuels). Future pricing for potential fuel sources is outside of the scope of an environmental document under NEPA.

[Comment 3-30, 3-31] Refer to response to Alternatives (Hydrogen-powered Trains and Alternative Fuels).

[Comment 3-38] See response to Transportation and Traffic.

[Comment 3-41] See response to Transportation and Traffic and response to Impact to I-580. See also the EA, Section 3.14, Transportation and Traffic, and EA Appendix H, Traffic Technical Memorandum, for information on construction impacts to transportation and traffic.

[Comment A-8] Refer to the response to Alternatives (Alternative Alignment [Below Grade/Subway]).

[Comment Aesthetics/Visual Impacts] Train crosses in a north and easterly direction from an elevated structure and not at the elevation of the roadway. BART trains travel in the median in both directions on I-580 at the same grade, and much closer to, vehicles on the interstate without incident. Other examples include the Dan Ryan branch of the Chicago Transit Authority Red Line and both branches of the Chicago Transit Authority Blue Line in Chicago, and the Lynwood LINK light-rail extension I-5 crossover in Seattle.

The request for an additional viewpoint is noted. As described in the Valley Link Visual Impact Assessment (prepared under separate cover) and the EA, Section 3.2.1, [Aesthetics] Affected Environment, the viewpoints analyzed in the EA were defined to represent a range of views from key perspectives and user groups throughout the project corridor. Viewpoints 9 and 10 account for and represent the visual characteristics and setting, and Build Alternative impacts, along this portion of the Altamont Pass.

[Editorial Comment] The full text of the final sentence on page 2-10 of the EA should read “The [Union Pacific Railroad] UPRR crossover tracks would allow for a connection between the UPRR and Valley Link rail alignments for the potential delivery of construction materials (such as stick and/or string running rail, concrete ties, etc.) by the construction contractor; for the potential delivery of rail vehicles by the vehicle supplier; and for potential transport of Valley Link rail vehicles to off-site facilities, including the San Joaquin Regional Rail Commission (SJRRC) maintenance facility in Stockton, California.” Note that this is a print error and does not change the analysis or the findings in the EA.

[Comment Conclusion] Refer to responses to the individual TRANSDEF comments above.

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### *Aesthetics and Visual Resources*

Some commenters had concerns regarding potential visual impacts of the Build Alternative, including impacts to scenic vistas, I-580 scenic route, and Altamont Pass Road. Concerns were related to sources of light and glare; and the aesthetic qualities of the viaducts, bridges, overpasses, and flyover structures in the Build Alternative.

The EA, Section 3.2, Aesthetics, includes an evaluation of visual changes resulting from implementation of the Build Alternative, including construction of the flyovers along I-580 near Greenville Road and the Dublin/Pleasanton BART Station. The 15% Preliminary Conceptual Design Plans, including alignment, stations, and crossovers (such as at Greenville Road), are available on the project website at [www.getvalleylinked.com](http://www.getvalleylinked.com).

Implementation of AMMs would lessen impacts associated with the Build Alternative throughout the project corridor. AES-4 would apply aesthetic design treatments to pedestrian overcrossings. Landscaping of the parking facilities at stations (AES-5), applying aesthetic design treatments to pedestrian bridges (AES-6), and replacement of vegetation along I-580 (AES-9) will aid in maintaining or minimally impacting visual intrusions along the eligible scenic roadway segments. In visually sensitive areas, AES-7 would install underground electric transmission lines and AES-8 would apply aesthetic surface treatments to certain structures. AES-10 would be implemented to direct new light sources away from residences.

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### *Air Quality*

Commenters raised questions regarding impacts on local air quality from both construction activities and operation of the Build Alternative.

Air quality impacts are summarized in the EA, Section 3.4, Air Quality. A series of air quality AMMs (AQ-1 through AQ-4) will be implemented for the construction phase of the Build Alternative to reduce adverse construction air quality impacts including emissions and minimize fugitive dust generation.

The Build Alternative would provide a frequent and reliable zero-emissions transit option in the I-580 corridor and would reduce vehicle miles traveled (VMT) and associated exhaust emissions in the air quality study area. As summarized in the EA, Section 3.4.2.2 Build Alternative [Air Quality] and the Air Quality and Greenhouse Gas Emissions Technical Report (Revised): Valley Link Project (prepared under separate cover), operational mobile source air toxics (MSAT) emissions from the use of off-road maintenance equipment associated with the project alignment and maintenance facilities would be minimal. Additionally, the Build Alternative has been determined to generate minimal air quality impacts for criteria pollutants and has not been linked with any MSAT concerns. The Build Alternative would not increase the capacity of I-580, change the vehicle mix, increase traffic volumes, or any other factor that would cause a meaningful increase in MSAT impacts when compared to the No Build Alternative.

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## *Alternatives*

Commenters noted questions about the consideration or elimination of various alternatives (such as, increasing Altamont Corridor Express [ACE] service, Iron Horse Trail Alternative, Bus/Bus Rapid Transit with Managed Lanes, and ZEMU/BEMU vehicle technology).

The EA Chapter 2, Alternatives Considered, discusses the alternative identification and the proposed vehicle technology as the result of robust, multi-year planning efforts that entailed multiple iterations of alternatives analysis and screening, including but not limited to:

- Valley Link Project Feasibility Report: 2018 and 2019
- Valley Link Draft and Final Environmental Impact Report (EIR): 2019–2021
- Valley Link Subsequent EIR (SEIR): 2022–2024
- Valley Link Equity Community Engagement: 2024
- *ACEforward* Project Draft EIR (SJRRRC 2017)<sup>2</sup>
- BART to Livermore Draft Program EIR (BART 2009)<sup>3</sup>
- BART to Livermore Project Draft EIR (BART 2017)<sup>4</sup>
- Various Valley Rail Program studies, including ACE Extension Lathrop to Ceres/Merced Extension EIR (SJRRRC 2018)<sup>5</sup>
- Altamont Corridor Vision (SJRRRC, TVSJVRRRA, San Joaquin Joint Powers Authority)

The EA, Section 2.3, Alternatives Considered but Eliminated from Further Evaluation, summarizes the range of alternatives considered, analyzed, and eliminated through the various phases of the project preceding the detailed analysis of the Build Alternative in the EA. The environmental document need not consider every conceivable alternative to a proposed action; rather, a reasonable range of alternatives that will foster informed decision making is considered.

### *Increasing Existing ACE Transit Service Alternative.*

Some commented that increasing or extending existing ACE service could be an alternative to the Build Alternative. Some commented that additional track capacity could be acquired from UPRR to accommodate additional ACE trains.

Increasing ACE service is outside the authority of the TVSJVRRRA. The alternative was dismissed, as summarized in the EA, Section 2.3, Alternatives Considered Eliminated from Further Evaluation (Table 2.3-1: Previous *ACEforward*, BART, and Valley Link Feasibility Report Alternatives Considered), and described in detail in the 2020 Draft EIR. The TVSJVRRRA considered previous analyses for ACE service extensions (documented in the *ACEforward* Project Draft EIR [SJRRRC 2017])<sup>6</sup> and iterations analyzed in the 2020 Draft EIR. Freight railroads or the ACE corridor

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<sup>2</sup> SJRRRC. 2017. *ACEforward* Draft Environmental Impact Report. San Joaquin Regional Rail Commission. May 2017.

<sup>3</sup> BART. 2009. BART to Livermore Extension Draft Program Environmental Impact Report. Bay Area Rapid Transit. State Clearinghouse No. 200806026. November.

<sup>4</sup> BART. 2017. Bart to Livermore Extension Project Draft Environmental Impact Report. Bay Area Rapid Transit. State Clearinghouse No. 2012082104. July.

<sup>5</sup> SJRRRC. 2018. ACE Extension Lathrop to Ceres/Merced. Draft Environmental Impact Report. San Joaquin Regional Rail Commission. State Clearinghouse No. 2018012014. April.

<sup>6</sup> SJRRRC. 2017. *ACEforward* Draft Environmental Impact Report. San Joaquin Regional Rail Commission. May 2017.

would require capacity upgrades and considerable track upgrades to meet the requirements of passenger trains and match an equivalent service level (all-day, bi-directional service at headways similar to BART in the peak period) provided by the Build Alternative.

#### *Iron Horse Trail Alternative*

Commenters indicated support for the previously dismissed Iron Horse Trail Alternative and questioned the applicability of Section 4(f) for the Iron Horse Trail. This alternative would utilize the Iron Horse Trail alignment in Pleasanton to connect the BART Dublin/Pleasanton Station to rail services along the UPRR Oakland Subdivision or Alameda County Transportation Corridor right-of-way through Livermore and eastern Pleasanton.

The consideration of the Iron Horse Trail Alternative is summarized in the 2021 EIR and the EA, Section 2.3, Alternatives Considered Eliminated from Further Evaluation (Table 2.3-2: Previous Valley Link 2021 CEQA EIR Alternatives Considered but Eliminated). As described in detail in the 2021 Final EIR Section 3.5.2, Response to Comment Letter O2, TRANSDEF, it was dismissed from further consideration because it would result in additional construction impacts in downtown Livermore, in eastern Pleasanton, and along the Iron Horse Trail; is not supported by the City of Pleasanton or the City of Livermore; would result in loss or disruption of public trails and parks in Pleasanton; and would result in inferior service times for Valley Link riders from eastern Livermore and San Joaquin County. In addition, this alternative does not meet the Project purpose to “Provide a sustainable transportation option and support local, state, and federal goals to promote sustainability, reduce GHG emissions, and enhance environmental quality” because it would place a railway through existing residential neighborhoods, require acquisition of park lands, displace/require rerouting of a Section 4(f) regional trail, and have inferior service and ridership resulting in less reductions of VMT, criteria pollutants, and GHG emissions.

Section 4(f) of the Department of Transportation Act (codified at Title 23 United States Code [U.S.C.] 138 and 49 U.S.C. 303) defines a Section 4(f) resource as a publicly owned and accessible public park, recreation, waterfowl or wildlife refuges and historic sites. The Iron Horse Trail is a 32-mile recreation trail maintained by the East Bay Regional Park District, which manages the trail for recreational purposes. As a publicly owned and accessible recreational facility, the Iron Horse Trail meets the definition of a Section 4(f) Resource.

#### *BART to ACE Connection and/or BART Extension*

Some commented that extending BART eastward and/or providing a BART to ACE connection could be alternatives to the Build Alternative.

Extensions of the BART or ACE alignments are outside the authority of the TVSJVRRRA. As noted in EA Section 1.1.1, Project Background, BART and SJRRC, the operator of the ACE service, have previously studied rail service expansion ideas in the Tri-Valley area. ACE identified long-term improvements in the Tri-Valley area that included a separate rail service connecting ACE to BART with the *ACEforward* Draft EIR (SJRRC 2017). SJRRC, after completion of the *ACEforward* Draft EIR, decided not to advance any ACE direct linkage to BART using the I-580 alignment or other alignments due to funding, logistical, and other constraints. BART assessed the feasibility of extending BART service one station to Livermore in the BART to Livermore Draft EIR (BART 2017). In May 2018, the BART Board of Directors

decided to no longer plan for expansion of the BART system to Livermore, and instead took action to defer project development in the corridor to TVSJVRRRA.

The consideration of connecting BART to ACE or extending BART service eastward is summarized in the EA, Section 2.3, Alternatives Considered Eliminated from Further Evaluation (Table 2.3-1: Previous ACE*forward*, BART, and Valley Link Feasibility Report Alternatives Considered), and described in more detail in the 2020 Draft EIR Section 5.8, Alternatives Considered but Withdrawn.

#### *Bus/Bus Rapid Transit with Managed Lanes*

As summarized in the EA, Section 2.3, Alternatives Considered Eliminated from Further Evaluation (Table 2.3-1: Previous ACE*forward*, BART, and Valley Link Feasibility Report Alternatives Considered, and Table 2.3-2: Previous Valley Link 2021 CEQA EIR Alternatives Considered but Eliminated), various bus alternatives were considered by TVSJVRRRA, including Bus/Bus Rapid Transit with Managed Lanes. As summarized in the referenced tables, while the Bus/Bus Rapid Transit Alternative with Managed Lanes would require less new infrastructure compared to a rail project due to the use of existing roadways for a large extent of the express bus service and lower upfront capital costs, it was dismissed due to substantially lower ridership and failure to meet project objectives.

#### *ZEMU/BEMU Technology Alternative*

One commenter requested preparation of an EIS to evaluate ZEMU/BEMU Technology Alternative with a cost-benefit analysis of hydrogen versus battery-electric technologies, and an analysis of potential environmental justice impacts of technology choice.

EA Section 2.2.4, Vehicles describes proposed ZEMU for the Build Alternative. Consistent with the purpose and need and implementing strategies identified in the Authority's Board-adopted Sustainability Policy and the State Rail Plan, the Build Alternative includes the use of ZEMU vehicles, particularly hydrogen-based vehicles. The EA does not dismiss ZEMU/BEMU technology for conflicts with state policy, nor does it preclude the use of ZEMU/BEMU technology should that technology be preferred upon implementation of the Build Alternative.

As summarized in the EA, Section 2.3, Alternatives Considered but Eliminated from Further Evaluation, and detailed in the 2020 Draft EIR Section 5.4.3, Electric Multiple Unit/Overhead Catenary System (EMU/OCS) Alternative, the EMU/OCS Alternative was withdrawn from consideration due to high cost of procurement and construction of catenary poles and wires for the entire length of the route (22 miles). Installation of an OCS would also require supporting traction power facilities, train control houses, traction power substations and paralleling stations, and a switching station as well as grading beneath existing overpasses on I-580 in the Tri-Valley area to accommodate the height of catenary poles/wires.

In addition, as described in the 2020 Draft EIR Section 5.4.3, Electric Multiple Unit/Overhead Catenary System (EMU/OCS) Alternative, the catenary wires along the alignment would also present visual and biological impacts that would not result from implementation of the Build Alternative. Implementation of an OCS would also require supporting traction power facilities—including train control houses, traction power substations and paralleling stations, and

a switching station—as well as potential additional grading beneath existing overpasses on I-580 in the Tri-Valley area to accommodate the height of catenary poles/wires. Limiting the number of catenary poles and strategically placing support facilities may minimize adverse impacts; however, the ability to do so would be dependent on distance/spacing requirements and physical/engineering constraints related to topography in the Altamont Pass area and existing I-580 and surrounding infrastructure. Regardless of placement, the EMU/OCS Alternative would require property acquisitions and result in potential adverse effects to sensitive biological resources in the Altamont area.

Regarding the suggestion to prepare an EIS with cost-benefit and environmental justice analysis which studies the ZEMU/BEMU Alternative, NEPA requires federal agencies to assess the environmental effects to the human and natural environment of proposed actions prior to making decisions. A cost-benefit analysis is not the purpose of an environmental document under NEPA. Also, the Executive Order (EO) 14096 (Revitalizing Our Nation's Commitment to Environmental Justice for All) and EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) were revoked by EO 14173 (Ending Illegal Discrimination and Restoring Merit-Based Opportunity) and EO 14148 (Initial Rescissions of Harmful Executive Orders and Actions) on January 21, 2025. The considerations under any of the rescinded EOs are no longer required.

#### *Hydrogen-powered Trains and Alternative Fuels*

One commenter questioned the cost and reliability of hydrogen-powered trains.

The Build Alternative includes ZEMU vehicles with the use of hydrogen. The EA, Section 3.4, Air Quality, and the Air Quality and Greenhouse Gas Emissions Technical Report (Revised): Valley Link Project (prepared under separate cover) analyze the air quality and GHG emission effects of the Build Alternative (inclusive of the vehicle technology). In the range of possible fuel types, hydrogen is considered one of the safest options available. Hydrogen is non-toxic and not considered a "hazardous material" under any regulatory scheme. The hydrogen anticipated for use to fuel Valley Link trains will be stored in accordance with federal (U.S. Department of Energy Code of Federal Regulations), National Fire Protection Association Hydrogen Technologies Code standards, state regulations, American Society of Mechanical Engineers guidance, and regional regulations that include specifications around proper storage, operation and maintenance procedures, accidental release prevention, fire prevention, and a health and safety plan.

#### *Alternative Alignment (Below Grade/Subway)*

Comments were received regarding concerns of visual impacts, highway safety, and other environmental impacts of the Build Alternative. They suggested consideration of a subway structure to avoid adverse impacts.

Various tunnel options were considered as part of the alternatives development process and multiple alternatives as summarized in EA Section 2.3, Alternatives Considered Eliminated from Further Evaluation, and the 2020 Draft EIR Sections 5.4 and 5.8. A tunnel under I-580 westbound to connect the east end of the rail alignment in the I-580 freeway median with the Alameda County Transportation corridor was not feasible due to design constraints associated with the existing I-580 freeway profile and area topography. In the area where the transition

from the freeway median to the transportation corridor begins, the westbound and eastbound lanes of I-580 are on a split profile with the westbound lanes being approximately 30 feet lower than the eastbound lanes. A tunnel under the westbound lanes would also need to be at a depth low enough to pass under the Greenville Road underpass below the freeway. From this depth, the alignment would then need to transition up to the Alameda County Transportation corridor to a point approximately 50 feet higher than the transition point. It would not be feasible to operate a train along the grades needed to pass under Greenville Road from the freeway median and up to the grade of the Alameda County Transportation corridor.

An underground connection of the Dublin/Pleasanton Station with the rail alignment in the I-580 freeway median would require a tunnel under the eastbound freeway lanes and the BART tail tracks. A tunnel-boring machine would likely be cost-prohibitive due the relatively short length and shallow depth of the tunnel that would be required. However, using a cut-and-cover technique would result in the disruption of BART service and lengthy closures of the freeway lanes.

The Valley Link 2021 EIR included a tunnel alignment in the Altamont Pass. The Altamont Tunnel Alternative was dismissed from further analysis because this alternative would not meet the Project's objective of bringing Valley Link service to fruition in the near-term due to the additional substantial costs of a tunnel, which are considered beyond a realistic funding plan for Valley Link and due to limited current available funding. The 2021 EIR determined that a tunnel alternative would add more than \$800 million to the Project and also increase the maintenance cost over the life of the Project.

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### *Design*

One commenter submitted questions regarding designs including: design of a potential future truck climbing lane on I-580, Greenville Road crossover, Southfront Road Station, Isabel Station, consideration of potential future projects along I-580, and impacts to I-580 interchanges. One commenter has requested project plans. The EA, planning studies, and design plans are publicly available on the project website at [www.getvalleylinked.com](http://www.getvalleylinked.com).

While potential truck climbing lanes along westbound I-580 at the Altamont Grade have been studied as a method to reduce congestion due to slow-moving truck, a project for potential truck climbing lanes has not been approved nor funded. The design of the Build Alternative would not conflict with the design of a potential future project for truck climbing lanes.

### *Coordination with I-580 Design Plans*

As shown in the 15% Preliminary Conceptual Design Plans, including the design of interchange modifications and flyovers along I-580 (near First Street, Vasco, Isabel, and others) have been prepared in coordination with Caltrans to ensure federal and Caltrans design standards. Coordination and design review with Caltrans will continue during the final design. See also response to Impact to I-580.

Information regarding modifications to I-580 in the vicinity of the Southfront Road Station may be found in the 15% Preliminary Conceptual Design Plans and the EA, Section 2.2.2.3, Southfront Road Station.

### *Greenville Crossover*

The preliminary design of the crossover near Greenville Road may be found in the 15% Preliminary Conceptual Design Plans and the EA, Section 2.2.1 and Proposed Rail Line (Figure 2.2-4: Build Alternative – Project Elements [4 of 8]). Refer to the Aesthetics and Visual Resources response for discussion on related impacts.

### *Operations and Maintenance Facilities*

As discussed in the EA, Section 2.2.3, Operations and Maintenance Facilities, the Build Alternative includes one OMF/OSS, one Maintenance of Way (MOW), and one Layover Facility (LF). The Mountain House LF would be used for cleaning, fueling, light maintenance, and periodic preventive maintenance of vehicles. The operations building at the Mountain House LF would also include two tracks for preventive maintenance and one track for repairs. The Altamont MOW would only function to provide a mid-alignment access point for hi-rail track maintenance vehicles, maintenance equipment storage, and off-peak/overnight storage of Valley Link Trains. No maintenance of trains would occur at this site. The warehouse, backup operations control center, and laydown area at the Tracy OMF/OSS are planned to be constructed to support initial operations. The remaining facilities are being cleared for future construction as the train and maintenance vehicle fleets are expanded.

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### *Biological Resources*

Comments were raised concerning potential impacts to wetlands, waterways, and drainages in the project area, specifically noting the Dublin/Pleasanton Station area and near flood control channels.

The analysis of impacts to biological resources and wetlands may be found in the EA, Section 3.5, Biological Resources, and EA Appendix E, Biological Assessment, as well as FONSI Attachment B, Section 7 USFWS Consultation – Biological Opinion. Aquatic resources and riverine environments are also discussed in the EA, Section 3.5.1.2, Aquatic Resources. Additionally, wildlife corridors were discussed with the Alameda County Resource Conservation District in 2024.

Impacts to aquatic resources would require permitting from the U.S. Army Corps of Engineers under the Clean Water Act and/or Porter-Cologne Act; the State Water Resources Control Board for coverage under the general construction activity storm water permit under Section 402 National Pollutant Discharge Elimination System; and possibly the Fish and Game Code (Section 1602), and the California Endangered Species Act (Section 2081). All permits will be obtained prior to construction activities that could affect aquatic resources.

The wetlands and waterways in question are not considered high-quality biological habitats. They are lined with concrete in places and lined with riprap in others. Moreover, the channels are filled with vegetation and are in a highly urbanized landscape. As described in the EA, Section 3.5, Biological Resources, and EA Appendix E, Biological Assessment, two California Department of Fish and Wildlife databases (California Natural Diversity Database and Biogeographic Information and Observation System), or eBird did not have record of the presence of aquatic or migratory birds in the area where the Dublin/Pleasanton BART Station and tracks are proposed. In addition, there are no special status/sensitive species' records for that section of restored wetland/flood control channel in those databases.

As discussed in the EA, Section 3.5.2.3, General Wildlife, the Build Alternative has the potential to interfere with wildlife movement throughout the biological resources study area. Transportation corridors, including roads and highways, can pose barriers to wildlife dispersal and migration through direct mortality from traffic, habitat fragmentation, light, and traffic noise-induced effects. However, based on preliminary design, the majority of the proposed trackway would align with the existing I-580 freeway, which would limit the increase in wildlife barriers, or be constructed on viaduct and/or bridge structures, allowing for unimpeded movement beneath the tracks in these areas. In addition, AMM AES-4 will minimize fugitive light during construction, AMM NV-1, and AMM NV-2 will minimize construction noise and vibration impacts, and AMM AES-10 (includes low-angle lights and light shielding) will minimize lighting impacts on wildlife during operation. With most project components proposed adjacent to existing transportation infrastructure, utility corridors, and other development or on elevated structures, and the implementation of lighting and noise reduction measures, effects to wildlife corridors would be negligible.

Existing wildlife corridor structures (culverted underpasses) under I-580 located north of Grant Line Road adjacent to Contra Costa Water District preserved land would not be permanently impacted. Other existing wildlife corridors including the underpass east of Greenville Road and existing waterways would be maintained by the installation of bridges and viaducts. Additional information will be gathered on wildlife corridors by the implementation of AMM BIO-29, which includes wildlife camera and track surveys, and AMM BIO-37, which includes consultation with the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service on feasibility and design of new wildlife corridors.

Potential adverse effects to migratory birds are discussed in the EA, Section 3.5.2.3, General Wildlife. Construction activities, particularly vegetation removal or clearing and grubbing, could remove active migratory bird nests and disrupt nesting activity by discouraging migratory birds from using refuge and cover, foraging, or nesting in the area of activities or adjacent undeveloped habitat. Implementation of AMM BIO-1 through AMM BIO-5, AMM BIO-31 through AMM BIO-33, and AMM BIO 35 would avoid the potential for construction activities to take migratory birds and /or eagles and reduce the potential for other bird-related impacts.

As part of the Build Alternative's mitigation measures (AMM BIO-2), pre-construction surveys would be completed, and potential impacts to sensitive species will be documented and mitigated as part of that process. In addition, AMM BIO-3 would be implemented to protect riparian habitat during construction.

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### *Cultural and Historic Resources*

One commenter raised concerns about a bridge (Tassajara Creek Bridge in Dublin, Bridge Number 330015Y at ALA 580 PM 018.32) that would be demolished as part of the Build Alternative. According to the commenter, the bridge could potentially be eligible for inclusion on the National Register of Historic Places (NRHP) because Dr. Martin Luther King, Jr. walked across it during a visit to the Santa Rita Rehabilitation Center (Santa Rita Jail) and made a speech nearby.

The Cultural Resources Master Report, which is in EA Appendix F, notes that none of the 29 state-owned historic-age roadway bridges within the Area of Potential Effects were found eligible for listing in the NRHP by Caltrans (Caltrans 2023).<sup>7</sup> Bridge 330015Y is one of the 29 historic-age roadway bridges in the Area of Potential Effects and was studied in Caltrans' Statewide Historic Bridge Inventory Update in 2015. In that study, Bridge 330015Y was designated Category 5, or ineligible for listing in the NRHP; the California State Historic Preservation Office concurred with Caltrans' findings. These findings are carried through in the most recent Historic Bridge Inventory (Caltrans 2023).

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### *Energy*

A commenter requested that energy be studied to make a comparison between energy used during construction of the Build Alternative and the "overall project energy savings accumulated over 20 years."

Energy is acknowledged in the EA, Section 3.1.1, Environmental Resources of No Concern, as a resource that was reviewed but dismissed from further detailed discussion in Chapter 3 due to the nature of its impacts. Energy impacts were analyzed for the Build Alternative as documented in the Valley Link Rail Project Energy Technical Report (prepared under separate cover). The analysis determined that the Build Alternative would result in net savings to energy usage during operations. Therefore, there would be no adverse impact related to direct energy.

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### *Farmlands*

One commenter raised concerns that the Mountain House LF would result in the loss of prime farmland.

As discussed in the EA, Section 3.3, Agricultural Lands, the construction of the Mountain House LF would result in the conversion of approximately 1.5 acres of prime farmland to non-agricultural use. This conversion would account for less than 0.1 percent of Important Farmland in San Joaquin County. However, to offset the loss of Important Farmland in these counties, the TVSJVRRRA would purchase agricultural conservation easements (see AMM AG-2).

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### *Floodplains*

One comment questioned if flood risk was considered in the evaluation of the Build Alternative.

The presence of, and potential for risk associated with, flood zones is discussed in the EA, Section 3.11, Hydrology and Water Quality. The Federal Emergency Management Agency (FEMA) is responsible for determining flood elevations and floodplain boundaries based on U.S. Army Corps of Engineers studies. FEMA is also responsible for producing and distributing Flood Insurance Rate Maps, which are used in the National Flood Insurance Program. These maps identify the locations of Special Flood Hazard areas, including the 100-year floodplain. The National Flood Insurance Program applies to the Project because portions of the corridor are in FEMA-designated Special Flood Hazard Areas. Special Flood Hazard Areas are defined as the areas that will be inundated by a flood event having a 1 percent chance of being equaled or

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<sup>7</sup> Caltrans. 2023. Structure Maintenance & Investigations, Historical Significance – State Agency Bridges (Historic Bridge Inventory). California Department of Transportation. January. On file at Caltrans Cultural Studies Office, Sacramento.

exceeded in any given year. The 1 percent annual chance flood is also referred to as the base flood or 100-year flood.

As described in AMM HYD-2, during the final design phase, TVSJVRRA will prepare site-specific detailed hydrologic and hydraulic studies for improvements that are proposed within the 100-year floodplain. The results of these studies will be used to inform the design of Build Alternative-related facilities and mitigations, such that they are specifically designed to not to adversely impact the 100-year floodplain as required by FEMA, Department of Water Resources, and U.S. Army Corps of Engineers standards so that upstream, on-site, and downstream flooding would not occur.

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### *Hazardous Materials*

Commenters questioned the potential use or exposure of hazardous materials during construction and operation of the Build Alternative.

As summarized in the EA, Section 3.10, Hazardous Materials, detailed Phase I Environmental Site Assessments were conducted to identify potential hazardous waste sites and potential for impacts related to hazardous waste sites or materials. AMM HAZ-1 requires implementation of a construction risk management plan prior to the start of construction activities. The plan would provide a framework for proper characterization and management of contaminated soils, ballast, and groundwater that could be disturbed during. Implementation of the plan would avoid short-term and long-term adverse health effects related to hazardous materials and hazardous waste during construction. As noted in the EA Appendix C, Permits and Avoidance, Minimization, and Mitigation Measures, the Phase I Initial Site Assessment: Valley Link Project (prepared under separate cover), and the Phase I Initial Site Assessment: Valley Link – Tracy Plot (prepared under separate cover), during operation of the Build Alternative, mandatory compliance with applicable regulations would reduce potential adverse effects related to the use and/or storage of hazardous materials, transport of hazardous materials, and disposal of hazardous waste.

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### *Noise and Vibration*

One commenter expressed concern over potential noise impacts associated with the Build Alternative, specifically associated with the construction and operation of the Mountain House LF.

The EA, Section 3.13, Noise and Vibration, discusses existing noise levels in the project area and the noise models from the trains within the Mountain House LF in compliance with the Federal Transit Administration (FTA) *Transit Noise and Vibration Impact Assessment Manual*. Long-term noise modeling locations included 23504 Los Ranchos Drive as a representative location in the Santos Ranch neighborhood (EA Appendix G, Noise and Vibration [Table G-1: Operational Noise Analysis – Detailed Results and Impact Conclusions (Receiver ID R-LT-15) and Figure G.13-16: Noise Receptor Locations]). The analysis determined that the Build Alternative would not result in adverse effects related to noise levels at this location. The dominant noise source at this location would be from traffic along Interstate 205 (I-205). It is also noted that heavy maintenance of trains will not be performed at the Mountain House LF. As such, no mitigation measures would be required.

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### *Public Outreach Efforts*

Comments expressed concern over perceived inadequate public outreach to the Los Ranchos Estates/Santos Ranch neighborhood in Unincorporated San Joaquin County, near the Mountain House Community Station/LF regarding changes in the Project prior to publication of the CEQA Draft SEIR, and a perceived lack of responsiveness to comments submitted on the SEIR. Commenters have expressed a desire for direction coordination with TVSJVRRRA to address their questions and concerns.

The EA, Section 4.1, Public Outreach, provides a summary of public outreach for the Project. The SEIR was prepared per CEQA requirements. The requirements for the SEIR under CEQA are separate from the EA under NEPA.

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### *Purpose and Need*

A commenter questioned the Project Purpose and Need, suggesting that the EA did not discuss transit connectivity between BART and ACE commuter rail and consistency with San Joaquin County land use policy.

The purpose and need statement informs the range of reasonable alternatives that the agency analyzes and considers. As stated in the EA, Section 1.2, Purpose of the Proposed Project, the Project Purpose is to connect the Tri-Valley Hub, a transit hub located at the Dublin/Pleasanton BART Station offering connections to intercity and local buses, to the state rail system to support megaregional mobility. The Project will increase regional transit connectivity, including between BART and ACE commuter rail service.

Goal LU-1.1 in the adopted San Joaquin County General Plan notes that, “The County shall discourage urban sprawl and promote compact development patterns, mixed-use development, and higher development intensities that conserve agricultural land resources, protect habitat, support transit, reduce vehicle trips, improve air quality, make efficient use of existing infrastructure, encourage healthful, active living, conserve energy and water, and diversify San Joaquin County's housing stock.” Valley Link endeavors to help achieve this goal through providing a new transit service that will reduce vehicle trips, help to improve air quality and provide an opportunity to develop housing near transit, diversifying its housing stock. Thus, creating more efficient use of the land. Consistency and compatibility with land use plans, from the perspective of impact analysis, is addressed in the EA, Section 3.12, Land Use and Property Acquisitions, and includes consideration of plans governing land use for both Alameda County and San Joaquin County.

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### *Safety*

Commenters expressed concerns over the safety of building a flyover over the freeway and concern over the perceived introduction of additional crime in the Los Ranchos Estates/Santos Ranch Neighborhood.

The EA Executive Summary notes safety and security as considered but dismissed from detailed discussion as a topic of no environmental concern. Construction of the Build Alternative would be in accordance with all applicable requirements to ensure safe operations along the entirety of

the project corridor, including the proposed I-580 flyovers. The assertion of increased crime is speculative and the commenter has provided no evidence to support the claim.

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### *Transportation and Traffic*

Various commentors questioned if the introduction of the Build Alternative would generate notable traffic impacts to surrounding communities, specifically noting the Mountain House area and the Los Ranchos Estates/Santos Ranch Neighborhood; questioned whether the Build Alternative is compatible with other state, regional or local traffic or transportation plans; requested environmental analysis of shifting of I-580; and requested discussion of construction-related traffic delays.

As discussed in the EA, Section 3.14, Transportation and Traffic, with the establishment of a new station and parking lot on a previously greenfield site in Mountain House, an increase in localized traffic is anticipated. Traffic to and from the Mountain House Community Station via all access points would increase during the morning and evening peak periods. The peak period spans four hours during the morning (5 a.m. to 9 a.m.) and five hours during the evening (2 p.m. to 7 p.m.) commute, with traffic dispersed throughout these timeframes. Based on review of the local roadway network, it is anticipated that most Valley Link patrons would access the Mountain House Community Station from north of the station via Mountain House Parkway, and from the south via the Mountain House Parkway / International Parkway / I-205 interchange. A large number of vehicles travelling to the station via Von Sosten Road is not expected due to the availability of these more direct routes. As shown in the EA Appendix H, Traffic Technical Memorandum, the intersection of Von Sosten Road and Mountain House Parkway would operate at Level of Service B with only a slight increase in vehicle delay under all scenarios analyzed. The volume of traffic approaching the intersection of Von Sosten Road and Mountain House Parkway along Von Sosten Road would not substantially increase during the AM or PM peak hours under the 2030 and 2040 Build Conditions.

The TVSJVRRRA will continue to coordinate with the City of Mountain House and San Joaquin County if the Build Alternative is implemented.

Construction along I-580 would impact limited portions of the freeway, but would not include demolition and reconstruction of I-580 in its entirety in the project area. See also response to Impact to I-580. Widened freeway lanes do not increase the capacity of the lane.

As noted in AMM TRA-1, a TMP will be prepared to minimize and manage delays during construction of the Build Alternative. Any construction-related delays would be temporary and limited to the duration of construction. Operational daily and annual travel time savings of the Build Alternative will be for the life of the operations of the transit service.

One commenter also asked, pertaining to EA Appendix H, Traffic Technical Memorandum (Table 7), “under ridership, you say that the "build alternative" would reduce VMT by 477,700 riders a day. If so, that would cause the congestion of the affected roadways to ease. What would be the new ridership in "induced demand" would be caused by this easing?” The commenter inaccurately noted the VMT reduction as riders per day. VMT refers to vehicle miles traveled, and while a reduction in VMT can generally equate to reduced congestion or improved

roadway operations, the VMT estimates do not directly translate to ridership estimates. Industry-standard assumptions regarding the 2040 roadway network, transit service, and use thereof are accounted for in the 2040 ridership estimates as presented.

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*Water Quality, Supply, and Drainage*

Commenters noted concerns over the potential for drinking water contamination, stormwater runoff/flooding, and water supply related to the construction and operation of the Build Alternative.

The EA, Section 3.11, Hydrology and Water Quality, discusses surface and groundwater resources and associated water quality in the project area and analyzes the potential effects of the Build Alternative on hydrology and water quality, stormwater runoff and urban pollutants, flooding, and groundwater resources. The EA, Appendix C, Permits and Avoidance, Minimization, and Mitigation Measures, also documents the relevant permits needed for construction and operation of the Build Alternative as well as AMM HYD-1, HYD-2 and HYD-3 describing required design and construction stage activities.