



Chapter 5: Other Alternatives Considered



5 Other Alternatives Considered

5.1 Introduction

This chapter describes compares the Proposed Project described in Chapter 2 (Project Description) of this Draft SEIR against the No Project Alternative. This chapter also summarizes the alternatives evaluated as part of the 2021 CEQA Final Environmental Impact Report (EIR).

5.2 No Project Alternative

5.2.1 CEQA Requirements

CEQA Guidelines Section 15126.6(e) requires the analysis of a No Project Alternative. The No Project Alternative analysis must discuss the existing conditions as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved.

The No Project Alternative would result in no new rail transit or other transit connection being established between the Central Valley and Bay Area. Existing transit services between the Central Valley and Bay Area would continue, including ACE between Stockton and San Jose, BART, and the various existing bus connections to BART. The No Project Alternative assumes that Phase I of the ACE Extension Project to Merced would be operational by 2025.

In addition, the No Project Alternative assumes the continuation of public commuter bus services operated by the San Joaquin Regional Transit District (RTD). The RTD Route 150 provides four westbound buses each weekday morning and six eastbound buses each evening between Dublin/Pleasanton BART and Tracy Transit Station. RTD also offers commuter bus service to major employment centers in Sunnyvale, with intermediate stops in Manteca, Tracy, and the Johnson Road Park and Ride in Pleasanton (at the I-580/I-680 interchange). The No Project Alternative also assumes that the existing roadway system would undergo maintenance but no capacity expansion projects.

5.2.2 Environmental Impacts

5.2.2.1 Aesthetics

Consistent with the Proposed Project, compliance with applicable design guidelines and policies and the municipal codes of the counties and cities would ensure that the No Project Alternative would result in less than significant aesthetic impacts related to scenic vistas, visual quality, and character, and light and glare. The No Project Alternative would result in no permanent change to visual character, views, nighttime lighting, or daytime glare. The No Project Alternative would not involve the construction of stations, vegetation removal, tree trimming, intersection and driveway modifications, new or modified culverts, and new or modified structures. No scenic resources would be removed as a result of the No Project Alternative because unlike the Proposed Project, no changes would occur from existing conditions. As such, the impacts of the No Project Alternative on aesthetic would be less than the Proposed Project.

5.2.2.2 Agricultural Resources

The No Project Alternative would avoid the impacts identified for the Proposed Project for agricultural resources. The No Project Alternative would not include temporary use nor direct conversion of important farmland to nonagricultural use. Therefore, the No Project Alternative would have no impact on agricultural resources compared to the Proposed Project.

5.2.2.3 Air Quality

Compared to the Proposed Project, the No Project Alternative would have no effect on air quality construction emissions since no project-related construction activity would occur. Operational impacts related to the No Project Alternative could potentially be more significant compared to the Proposed Project. Implementation of the Proposed Project would result in several air quality benefits, including reduced automobile VMT and availability of zero-emissions public transportation. These benefits would not be realized by the No Project Alternative.



5.2.2.4 Biological Resources

The No Project Alternative would construction or operational impacts on biological resources. The Proposed Project construction activities, as well as operation of Proposed Project elements, could impact sensitive natural communities and habitat for status species. Additionally, while the No Project Alternative would maintain vehicle use along existing roadways which currently act as barriers to wildlife movement, the Proposed Project would increase train operations along currently unused railway rights-of-way that include biological resources. Overall, the Proposed Project would have greater impacts on biological resources compared to the No Project Alternative, due to the Proposed Project's construction and operations activities.

5.2.2.5 Cultural Resources

The No Project Alternative would not result in construction- or operation-related impacts on cultural resources. While the Proposed Project could result in impacts to archaeological resources, these impacts would be reduced to less than significant with the adoptions of mitigation measures.

5.2.2.6 Energy

The No Project Alternative would not require any construction fuels and, therefore, would have no impact on energy usage because there would be no construction phase. The operational phase of the Proposed Project would provide an alternative to driving and divert travelers from personal vehicles to passenger rail. The related decrease in energy consumption anticipated by the Proposed Project would offset the energy demands of the Proposed Project's construction phase. The No Project Alternative would not divert any travelers from personal vehicles and therefore, continued personal vehicle use is anticipated. Thus, operational energy impacts would be greater with the No Project Alternative than they would be with the Proposed Project.

5.2.2.7 Geology and Soils

Similar to the Proposed Project, the No Project Alternative could expose people and/or structures to potentially substantial adverse effects resulting from strong seismic ground-shaking or seismic-related ground failure. All impacts associated with geological and soil impacts that were identified for the Proposed Project would also apply to No Project Alternative. The risks to people and structures would not be increased regardless

of the size or type of development, as adherence to existing regulations would assure seismic safety to the greatest extent possible. All future development in the project area would be required to adhere to the most recent California Building Codes, which includes strict building specifications to ensure structural and foundational stability, similar to the Proposed Project. In addition, the counties and cities would continue to require all future development to prepare and submit a detailed soils and geotechnical analysis for site-specific projects. All future development projects would be required to adhere to existing regulations. Impacts associated with rupture of a known earthquake fault, strong seismic ground-shaking, seismic-related ground failure, and landslides would continue to be less than significant.

The No Project Alternative would not include ground-disturbing activities—such as excavation and trenching for foundations and utilities, soil compaction, and site grading—that could potentially result in soil-related impacts. The No Project Alternative would not require earthmoving activities that could result in potentially significant impacts related to geology and soils that would require mitigation to reduce impacts to a less than significant level, as is the case for the Proposed Project. In addition, the No Project Alternative would avoid potential construction- or operation-related effects on paleontological resources or unique geological features.

5.2.2.8 Greenhouse Gas Emissions

As described in Section 3.8 (GHG Emissions), the Proposed Project would result in construction GHG emissions that would be more than offset by net reduction in GHG emissions during operations. The reduction of vehicle-related emissions far outweighs the operational emissions of the Proposed Project. The Proposed Project would result in a substantial reduction in GHG emissions. The No Project Alternative would avoid construction and operational train emissions but would also not lower emissions related to personal vehicle use and thus would result in higher future GHG emissions than the Proposed Project.

5.2.2.9 Hazards and Hazardous Materials

The No Project Alternative would not result in earth-moving activities that could result in the exposure of known or unknown soil and/or groundwater contamination, or other hazardous materials during



construction. Therefore, unlike the Proposed Project, which would require mitigation to reduce potential impacts associated with soil and/or groundwater contamination or other hazardous materials, no mitigation would be required under the No Project Alternative. However, because alterations to existing development would occur under the No Project Alternative, implementation of mitigation measures identified for the Proposed Project, such as appropriate testing and abatement actions for asbestos, lead, and other hazardous materials would still be required to ensure that impacts remain less than significant. As such, the No Project Alternative would result in a less than significant impact to hazards and hazardous materials, similar to, but less than, the Proposed Project during construction.

5.2.2.10 Hydrology and Water Quality

Compliance with all applicable regulations, requirements, and plans would ensure that impacts to hydrology and water quality would be less than significant under the No Project Alternative, consistent with the Proposed Project. However, the No Project Alternative would not result in the creation of new impermeable surfaces. As such, the No Project Alternative would result in a less than significant impact to hydrology.

The No Project Alternative could result in the construction of new and/or improved stormwater drainage facilities. Construction of these new facilities would be subject to existing regulatory requirements, including but not limited to preparation and implementation of a stormwater pollution prevention plan (SWPPP) and a precise grading permit, the De Minimis Threat General Permit, and stormwater BMPs. Therefore, existing regulatory requirements would ensure that construction of new or expanded stormwater drainage facilities would not result in substantial environmental effects. Similar to the Proposed Project, this impact would remain less than significant.

5.2.2.11 Land Use and Planning

The No Project Alternative would not result in impacts related to land use nor would it conflict with existing land use policies in place for the jurisdictions in the Proposed Project Area. Therefore, the No Project Alternative would not interfere with the existing land use plans. This result is similar to the Proposed Project, which would have a less than significant impact.

5.2.2.12 Noise and Vibration

Compared to the Proposed Project, the No Project Alternative would have no impacts related to noise and vibration. The No Project Alternative would not include the construction of a new potential source of noise and vibration in the Proposed Project area. Any development occurring under the No Project Alternative would be subject to the noise ordinances of local jurisdictions would be required to implement mitigation measures intended to reduce related noise impacts to a less than significant level.

5.2.2.13 Population and Housing

The No Project Alternative would have no impacts related to population and housing. The Proposed Project area would experience changes in population consistent with current projections. This would be similar to the less than significant impacts that would result from the Proposed Project. Construction and operation of the Proposed Project would not induce substantial unplanned population growth, either directly or indirectly. However, the No Project Alternative would avoid potential relocation impacts associated with ROW acquisition required by the Proposed Project.

5.2.2.14 Public Services

Potential impacts to public services associated with the No Project Alternative would be similar those identified for the Proposed Project. The need for new or expanded public services is indirectly related to population increases. Because the Proposed Project would not induce substantial unplanned population growth, the Proposed Project would not result in the need for expanded services.

5.2.2.15 Recreation

The No Project Alternative would not result in the need for additional recreational facilities, nor would it result in the potential increase in the use of existing recreational facilities. Impacts to public services would be slightly less than the Proposed Project because there would be less demand on public services than the Proposed Project.

5.2.2.16 Safety and Security

The No Project Alternative would not result in impacts related to emergency response or evacuation plans, nor would the No Project Alternative create a safety hazard or excessive noise for people residing or working in the project area, for a project located within an airport land



use plan. The No Project Alternative does not include the construction of new infrastructure that could impact existing safety and security in the Proposed Project area. This would be similar to the potential less-than-significant impacts of the Proposed Project.

5.2.2.17 Transportation and Traffic

The No Project Alternative would avoid potential temporary construction-related impacts to the existing circulation system, including transit, roadway, and bicycle/pedestrian facilities. However, the benefits of the Proposed Project related to a reduction in automobile VMT would not be realized with the No Project Alternative.

5.2.2.18 Utilities and Service Systems

The No Project Alternative would have no impact on utility and service systems. There would not be an increase in demand for services nor the need to construct new services. While the Proposed Project would result in an increase in demand for water, natural gas, and electricity, these impacts would be less than significant.

The No Project Alternative would not result in an increase in solid waste or wastewater and would therefore not affect the capacity of solid waste or wastewater service providers. This compared with the less-than-significant impacts related to the Proposed Project.

5.3 2021 Final Environmental Impact Report Alternatives

The Tri-Valley – San Joaquin Valley Regional Rail Authority (the Authority), acting as lead agency under the California Environmental Quality Act (CEQA), prepared a Draft Environmental Impact Report (EIR) for the Valley Link Project. The Authority Board certified the Final EIR and approved the staff recommended CEQA-Certified Alternative on May 12, 2021.

The 2021 CEQA-Certified Alternative was a 42-mile, seven-station passenger rail project that would connect the existing Dublin/Pleasanton Bay Area Rapid Transit (BART) Station in Alameda County to the approved Altamont Corridor Express (ACE) North Lathrop Station in San Joaquin County. This alternative was anticipated to utilize existing transportation corridors: the existing

Interstate 580 (I-580) corridor in the Tri-Valley, the Alameda County-owned former Southern Pacific Railroad corridor through the Altamont Pass, and the existing Union Pacific Railroad Corridor in Northern San Joaquin County.

The CEQA-Certified Alternative also included two initial operating segments (IOS). The IOS would establish initial service from the Dublin/Pleasanton BART Station to either the Southfront Road Station Alternative or the Mountain House Station Alternative. The Mountain House Station Alternative IOS is the basis of the proposed locally preferred alternative.

The Final EIR evaluated four vehicle technology variants (Diesel Multiple Unit, Hybrid Multiple Unit, Battery Electric Multiple Unit, and Diesel Locomotive Haul); however, the CEQA-Certified Alternative did not include a preferred vehicle technology. The preferred power source identified was one that would minimize air quality degradation and greenhouse gas (GHG) emissions and meet the desired performance criteria (including train speed and acceleration/deceleration rate). It was also recognized at that time that development of zero-emission vehicle technologies to meet these objectives was rapidly advancing in the marketplace. A zero-emission hydrogen-powered vehicle that meets project goals and requirements is now available and has been identified.

Subsequent to the Authority's Board certification of the Final EIR in 2021, the San Joaquin Council of Governments (SJCOG) began CEQA review of improvements to Interstate 205 (I-205) with plans to accommodate rail transit in the freeway median. The widened I-205 freeway median could potentially be utilized as an option by Valley Link to extend service beyond the IOS from the Mountain House Station to the North Lathrop Station. Concurrent with the SJCOG plans, the Authority advanced design and analysis on the IOS from the existing Dublin/Pleasanton BART Station to include a new alignment segment that would align with the longer term I-205 rail corridor and that responds to requests by the community of Mountain House for a relocated station. This new segment would enable improved station access and facilitate the advancement of transit-oriented development. This segment also includes a new Operations and Maintenance Facility (OMF) at the east end of the alignment. These revisions to the CEQA-Certified Alternative are now part of the Authority's



locally preferred alternative (as described in Chapter 2, Proposed Project) that is the subject of this Draft SEIR. Extension of service beyond Mountain House would be the subject of a future environmental documentation process.

The CEQA Guidelines require that the range of alternatives addressed in an EIR be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (CEQA Guidelines Section 15126.6). CEQA Guidelines Section 15126.6 states that the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries. The discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives or would be more costly. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis need not be presented in the same level of detail as the assessment of the project.

The 2021 EIR included an evaluation of four station alternatives, one OMF alternative, and one alignment alternative. These alternatives (described below) were analyzed at an equal detail level as the 2021 proposed project in the 2021 EIR.

- **The Stone Cut Alignment Alternative** would be the same as the 2021 proposed project, except for the alignment at the top of the Altamont Pass. Compared to the 2021 proposed project, this alternative would have slightly greater construction impacts due to a greater amount of earthwork. The Stone Cut Alignment Alternative's operations would produce less train fuel use and yield greater ridership (due to shorter service times). In turn, these operational impacts would have greater criteria pollutants, GHG emissions, and energy use reductions. The Stone Cut Alignment Alternative would have greater visual effects because it would be more visible along eastbound I-580 at one location. The Stone Cut Alignment Alternative was included as part of the staff-recommended CEQA-Certified Alternative
- **The Southfront Road Station Alternative** would be the same as the 2021 proposed project, except for two different station options. The Southfront Road Station Alternative would also result in higher ridership than the 2021 proposed project. The Southfront Road Station Alternative was included as part of the staff-recommended CEQA-Certified Alternative.
- **The Mountain House Station Alternative** would have lower impacts on biological resources and wildlife movement, important farmland, and land use and planning compared to the Mountain House Station included in the 2021 proposed project.
- **The West Tracy OMF Alternative** would be the same as the 2021 proposed project, except for the OMF location.
- **The Downtown Tracy Parking Alternative 1** would be the same as the 2021 proposed project, except for use of a south garage.
- **The Downtown Tracy Parking Alternative 2** would be the same as the 2021 proposed project, except for use of a north garage.

The following three alternatives, including the No Project Alternative, were analyzed in the 2021 EIR at a lesser level of detail than the 2021 proposed project.

- **The No Project Alternative**, which is assessed in this SEIR, would result in no new rail transit or other transit connection being established between the Central Valley and Bay Area. In this alternative, Phase I of the ACE Extension Project to Merced would be operational by 2025. Existing transit services between the Central Valley and Bay Area would continue, including ACE between Stockton and San Jose, BART, and the various existing bus connections to BART.
- **The Bus/Bus Rapid Transit with Managed Lanes Alternative** would require less new infrastructure than a rail project since it would use existing roadways to a large extent for express bus service. This alternative would have substantially lower upfront capital costs than a rail project due to lower construction costs. Between Greenville Road and Dublin/Pleasanton BART Station, buses would operate in the existing I-580 Express Lanes.



- **The Electric Multiple Unit with Overhead Catenary System Alternative** would generally be the same as the 2021 proposed project in terms of alignment, stations, frequency, ridership, and general operations. While the 2021 proposed project would use Diesel Multiple Unit, Hybrid Multiple Unit, Battery Electric Multiple Unit, or Diesel Locomotive Haul technology variants, the Electric Multiple Unit with Overhead Catenary System Alternative would use Electric Multiple Unit trainsets. These Electric Multiple Unit trainsets that would receive electric power from an overhead catenary system consisting of wires running continuously above the alignment, supported by a series of poles placed immediately along the rail alignment (assumed to be within the same footprint as the Proposed Project). Given that some Electric Multiple Unit trains are powered by a third rail, a third-rail system requires a completely enclosed right-of-way. An Electric Multiple Unit powered by a third rail was considered but dismissed from further analysis due to such concerns.

The 2021 EIR also included a description of alternatives that were not carried forward for analysis. These alternatives included operating technologies, modal alternatives, and alternative alignments and stations. A review of these alternatives, the screening process, and why they were dismissed from further analysis is included in the 2021 EIR.

As the analysis for the other alternatives has not changed since preparation of the 2021 EIR and existing conditions on the alternatives are consistent with those described in the 2021 EIR, impacts identified for the alternatives in the 2021 EIR remain substantially true. Therefore, this Subsequent Environmental Impact Report (SEIR) provides analysis for the No Project Alternative, where additional analysis is required in order to comply with revised regulations or conditions have changed.