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February 15, 2017

Mr. Tom Fitzwater
Santa Clara Valley Transportation Authority
3331 North First Street, Building B
San Jose, CA 95134-1927

Subject: VTA's BART Silicon Valley Phase II Extension Project Draft Supplemental Environmental Impact Statement (SEIS)/Supplemental Environmental Impact Report (SEIR) and Draft Section 4(f) Evaluation

Dear Mr. Fitzwater:

Thank you for the opportunity to comment on VTA's BART Silicon Valley Phase II Extension Project (BART Extension Project) Draft Supplemental Environmental Impact Statement (SEIS)/Supplemental Environmental Impact Report (SEIR) and Draft Section 4(f) Evaluation. It is our understanding that the BART Extension Project would begin at the terminus of the BART Phase I Project and extend approximately 6 miles to the City of Santa Clara. The BART Extension would include a 5-mile tunnel through downtown San Jose and four stations: Alum Rock/28th Street, Downtown San Jose, Diridon, and Santa Clara.

The Peninsula Corridor Joint Powers Board (JPB) supports the BART Extension Project and looks forward to an expanded transit system in the Bay Area, particularly for improved transit connections with the San Jose Diridon Station.

R1-1

Regarding the Draft SEIS/SEIR, the JPB has the following comments.

1. The JPB prefers the Diridon North, Single-Bore Option. The Diridon North, Twin-Bore Option would impact JPB's Main Track 1 (MT-1) which will cause system-wide operational delays for Caltrain. Taking MT-1 out of service during construction would require our tenant services (i.e., UPRR, Amtrak, Capital Corridor, and ACE) to use MT-2 at Control Point (CP) Stockton. This will cause major congestion between CP Stockton and Diridon Station, resulting in system-wide delays.

Additionally, taking MT-1 out of service during construction will prevent northbound trains from routing on to Track 1 or departing from Track 1 at Diridon which will then lead to congestion, station delays, and system-wide delays.

R1-1,
cont.

2. The JPB will require close coordination with VTA regarding the construction activities and types of equipment used at the proposed Construction Staging Area (CSA) for Diridon Station North. Coordination of appropriate work windows and work hours, as well as pertinent access planning, is critical to ensure the continued safe operations of the facility during construction of the BART Extension Project.

R1-2

3. VTA's current schedule shows that construction of the BART Extension Project would commence approximately when JPB's Peninsula Corridor Electrification Project (PCEP) becomes operational. As our main southern terminus, San Jose Diridon Station is a vital connection to not only Caltrain, but also to Capitol Corridor and the Altamont Corridor Express services. The station is a bustling hub that currently hosts shuttles, many bus services including VTA bus connections, taxis, Greyhound, and is heavily utilized by pedestrian and bikes. Currently, approximately 25% of Caltrain's patrons accessing San Jose Diridon drive and park. It is, therefore, necessary that all modes of access are maintained for passengers throughout construction. The impacts to the parking lots are of particular concern to the JPB. As such, the JPB is very interested in VTA's plans to mitigate parking impacts during construction. Further, the JPB requests that VTA prepare a Construction Work Plan which exhibits how modes of access to passengers will be addressed.

R1-3

The JPB supports VTA's commitment to working with transit providers in the Diridon Station area to evaluate parking demand based on updated transit patron mode of access data and/or VTA policies established for transit park-and-ride lots. The JPB looks forward to continuing to work with VTA, the City of San Jose, and other area stakeholders to develop an interim short-term parking plan through 2025 that will address parking needs in the Diridon Station area, as well as participating in the Diridon Intermodal Study to analyze long-term multimodal access in and around Diridon Station in 2025 and beyond once proposed transit and development projects are in place.

As our partner in providing transit service to the Bay Area, we are confident that VTA is equally committed to ensuring that Caltrain's operations are maintained throughout construction and operation of the BART Extension Project. As VTA knows, JPB has several approved and future projects along JPB's corridor and within the Diridon Station area. The JPB looks forward to continued close coordination with VTA as a preferred alternative for the BART Extension Project is selected and construction scheduling and sequencing is determined.

If you have any additional questions, please do not hesitate to contact Elizabeth Scanlon at ScanlonE@samtrans.com or (650) 295-6867.

R1-3,
cont.

Sincerely,



Michelle Bouchard
Chief Operating Officer, Rail

Cc: Elizabeth Scanlon, Caltrain
Elizabeth Antin, Caltrain
Stacy Cocke, Caltrain
Matt Verhoff, Caltrain
Joe Navarro, Caltrain
Stephen Chao, Caltrain

Response to Comment Letter R1

Peninsula Corridor Joint Powers Board (Caltrain)

R1-1 Prior to the construction of the project, VTA will coordinate with Caltrain to develop a construction phasing plan that will provide continued access to Caltrain and VTA's light rail and bus service in the vicinity of Diridon Station. VTA will also work closely with Caltrain to identify locations for interim transit parking during construction. In addition, as described in Mitigation Measures TRA-CNST-A: Develop and Implement a Construction Education and Outreach Plan, and TRA-CNST-D: Provide Temporary Replacement Parking at Diridon Station, in Section 5.5.1, *Construction Outreach Management Plan*, and Section 5.5.2.7, *Diridon Station (South and North Options)*, respectively, VTA will develop and implement a Construction Education and Outreach Plan as well as a Parking Management Plan to address construction issues and inform the public and other stakeholders of the construction schedule and associated activities.

Since the release of the Draft SEIS/SEIR, the station plan for the Diridon Station North Option (Twin-Bore) has been refined to avoid affecting the existing rail tracks at Diridon Station. Construction would be jack-and bore, tunneling, or another underground construction methodology that avoids the need to disrupt the track. There would be no impacts on existing Caltrain Service as a result. Refer to Figure 2-9, *Diridon Station North Option Plan (Twin-Bore)*, for the revised plan. Because of the change to the station plan and VTA's effort to avoid impacting the tracks, which was previously identified as a *Significant and Unavoidable Impact*, the impact on heavy rail during construction at Diridon Station under the North Option (Twin-Bore) would now be reduced to *No Impact*. This reduction in severity of previously described impacts has been made throughout the SEIS/SEIR including the *Executive Summary*; Chapter 5, *NEPA Alternatives Analysis of Construction*; Chapter 6, *CEQA Alternatives Analysis of Construction and Operation*; and Chapter 7, *Other NEPA and CEQA Considerations*.

As detailed in Section 10.6, VTA has conducted several coordination meetings with Caltrain directly as well as through their participation on the Diridon Interagency Working Group, Diridon Operators Working Group, and the Executive Level Diridon Interagency Working Group Meetings.

VTA will continue work in cooperation with Caltrain through the environmental, engineering, and construction phases.

R1-2 As requested, VTA will continue to coordinate with Caltrain during the construction phase including construction activities and types of equipment to be used at the CSA near Diridon Station. Contractors' work windows, hours, and

access near Diridon Station will comply with the City of San Jose applicable codes and ordinances.

R1-3 See response to comment L3-7.



February 2, 2017

Mr. Tom Fitzwater
 VTA Environmental Programs & Resources Management
 Building B-2
 3331 North First Street
 San Jose, CA 95134

SENT VIA Email to: BARTPhase2EIS-EIR@vta.org

SUBJECT: CCJPA Comments Regarding BART Phase 2 EIS-EIR

BOARD OF DIRECTORS
 PLACER COUNTY
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 PLANNING AGENCY
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**CAPITOL CORRIDOR
 JOINT POWERS AUTHORITY**
 300 LAKESIDE DRIVE
 14TH FLOOR EAST
 OAKLAND, CA 94612
 (V) 510.464.6995
 (F) 510.464.6901
www.capitolcorridor.org

Dear Mr. Fitzwater,

I am writing on behalf of the Capitol Corridor Joint Powers Authority (CCJPA), the managing agency of the Capitol Corridor Intercity Passenger Rail service, to provide comments for the Draft Supplemental Environmental Impact Statement/Draft Subsequent Environmental Impact Report and Draft Section 4(f) Evaluation (Draft SEIS/SEIR) for the BART Phase II Extension Project in Santa Clara County. The purpose of this letter is to correct some assumptions the Draft SEIS/SEIR document has about planned Capitol Corridor service changes for the forecast year 2035, which will likely affect the ridership projections for Capitol Corridor in the document.

The corrections for the Capitol Corridor service changes for the forecast year 2035 are as follows:

- No Union City intermodal station is planned to be open and serving Capitol Corridor trains by 2035 (as referenced in Table 37 of the Transportation Impact Analysis Technical Report and in Table 2-1: 2035 No Build Alternative Transit Improvements in BART Silicon Valley Area of the draft SEIS/SEIR).
- No change to train service frequency between Oakland and San Jose from current-day seven (7) round-trips/day to 11 round-trips/day, based on our most recent Oakland to San Jose service expansion project status (same discussion below).

While there was an EIR developed by Union City for a Union City intermodal station that would serve both BART and Capitol Corridor, the Capitol Corridor portion of the improvements were never pursued into project implementation by Union City or Capitol Corridor primarily since the cost to make the connection was never funded. As well, the Union City intermodal station is not a project that has been formally adopted by the Capitol Corridor Joint Powers Board.

At the time the BART Phase II Extension Project EIR was commenced the CCJPA Oakland to San Jose phase 2 service expansion project did propose to increase service frequency between Oakland and San Jose from the existing seven daily round trips to 11, however, the project has encountered funding and host-railroad negotiation obstacles. The project as planned is now on hiatus awaiting a different

approach as documented in our CCJPA Vision Implementation Plan or VIP (www.capitolcorridor.org/vision-plan/).

R2-1

R2-2

The VIP includes service expansion goals along a coastal alignment (the Coast Subdivision) between Oakland and San Jose (an alignment that does not include operating on the Niles or Oakland Subdivision near the Union City BART station) for much more extensive service expansion (four round-trips during peak hours) than just the addition of four round-trip trains as was the plan with the Oakland to San Jose phase 2 service expansion. However, this VIP is only a high-level planning document. Such a project has not been environmentally cleared, there is no funding source at present for such a project, and a timeframe for implementation is not yet determined.

R2-2

The implications for the evaluation included in the BART Phase II Extension Project are clear with respect to Capitol Corridor serving a Union City station. With this information about Capitol Corridor service in 2035, the 2035 ridership forecast numbers for Capitol Corridor (and perhaps even for the VTA BART Extension Phase II) will very likely be different than those presented in Tables 3-9 and 3-11 of the draft SEIS/SEIR. There will be no Union City Capitol Corridor/BART station which may have played a role in shifting service to the BART extension.

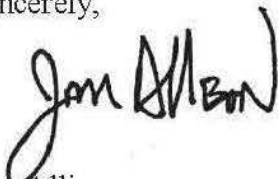
In contrast, future intercity or even commuter rail service expansion between Oakland and San Jose, as identified in our VIP, by 2035 is uncertain. Much more frequent service is in our long-range plans but would not, at this point, be a adopted and funded plan. We ask that the uncertainty surrounding Oakland to San Jose service expansion be considered per the judgement of the document preparation team.

R2-3

CCJPA is supportive of VTA's BART Silicon Valley Phase II Extension, and staff look forward to working with VTA and BART to ensure that future transit connections between BART and Capitol Corridor at San Jose Diridon station and Santa Clara station are smooth and efficient.

Thank you in advance for addressing the issues covered in this letter, and please reach out if you have any questions (jjima@capitolcorridor.org, 510-464-6994).

Sincerely,



Jim Allison
Manager of Planning

Response to Comment Letter R2

Capitol Corridor Joint Powers Authority

R2-1 The background projects assumed in the forecast models for the No Build and BART Extension Alternative conditions are based on the latest adopted projects in the Metropolitan Transportation Commission's (MTC) Regional Transportation Plan (RTP), known as Plan Bay Area, adopted in July 2013. VTA is required by FTA to be consistent with the background projects as assumed in the RTP. The Union City Intermodal Station is included in Plan Bay Area as Project ID 21123. MTC and the Association of Bay Area Governments (ABAG) have recently updated the long-range RTP for the San Francisco Bay Area, and the Union City Intermodal Station is also included in Plan Bay Area 2040 as RTP ID 17-01-0059.

R2-2 The background projects assumed in the forecast models for the No Build and BART Extension Alternative conditions are based on the latest adopted projects in Plan Bay Area, adopted in July 2013. VTA is required to be consistent with the background projects as assumed in the RTP. Changes to service frequencies are based on a supplementary report to Plan Bay Area, the Final Plan Bay Area Project List (July 2013). The Draft SEIS/SEIR was prepared prior to adoption of Plan Bay Area 2040 in July 2017. However, Plan Bay Area 2040 did not specify any changes to the Capital Corridor service frequencies assumed in the previous RTP that was used by VTA.

While the Capitol Corridor Joint Powers Board was planning for service increases as stated in the comment, the increases are now delayed due to funding and host-railroad negotiation obstacles as stated in the comment. Even if the service increase had been included in the forecast models, changes in Capitol Corridor service frequencies would not change the conclusions of the SEIS/SEIR because whether there were 7 trains per day or 11 trains per day, the peak period headway would remain approximately 60 minutes, as coded in the forecast model. The increase in service would primarily affect headways during the off-peak. Increasing the headway to 90 minutes in the off-peak would have a negligible effect on projected BART Extension ridership and the environmental analysis.

Therefore, the SEIS/SEIR analysis is consistent with the regional plans, and even if Capitol Corridor service was expanded, the increase would not alter the conclusions of the SEIS/SEIR.

R2-3 Support for the BART Extension project is noted. As stated in responses to comments R2-1 and R2-2 above, the background projects assumed in the forecast models for the No Build and BART Extension Alternative conditions are based on the adopted projects in Plan Bay Area, adopted in July 2013. VTA is required by FTA to be consistent with the background projects as assumed in the RTP. Plan

Bay Area 2040, adopted in July 2017, also includes a Union City Intermodal Station. Changes in ridership based on changes from what was assumed in the RTP (eliminating a Union City Station or decreased service) would not change the conclusions of the environmental analysis.



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Phone: 209.525.6333 Fax 209.544.6226

STANISLAUS COUNTY ENVIRONMENTAL REVIEW COMMITTEE

February 17, 2017

Tom Fitzwater, SVRT Environmental Planning Manager
VTA Environmental Programs & Resources Management
Building B-2
331 North First Street
San Jose, CA 95134

**SUBJECT: ENVIRONMENTAL REFERRAL – VALLEY TRANSPORTATION AUTHORITY
(VTA) – BART SILICON VALLEY PHASE II EXTENSION PROJECT – NOTICE
OF AVAILABILITY OF DRAFT/SEIS/SEIR**

Mr. Fitzwater:

Thank you for the opportunity to review the above-referenced project.

The Stanislaus County Environmental Review Committee (ERC) has reviewed the subject project and has no comments at this time.

The ERC appreciates the opportunity to comment on this project.

Sincerely,

Patrick Cavanah
Management Consultant
Environmental Review Committee

PC:ss

cc: ERC Members

R3-1

Response to Comment Letter R3

Stanislaus County

- R3-1 Stanislaus County Environmental Review Committee's review of the project and statement that it has no comments are noted.



March 6, 2017

Dedicated to
passengers

Responsive
to change

Committed
to growth

Tom Fitzwater, SVRT Environmental Planning Manager
VTA Environmental Programs & Resources Management, Building B-2
3331 North First Street, San Jose, CA 95134
Via email: BARTPhase2EIS-EIR@vta.org

Re: VTA's BART Silicon Valley - Phase II Extension Project (SCH# 2002022004)

Dear Mr. Fitzwater:

Thank you for the opportunity to comment on the Draft SEIS/SEIR for VTA's BART Silicon Valley - Phase II Extension Project. We support the development of a regional transit network that will help improve public transit service in the San Francisco Bay Area, enhance regional connectivity, maintain the economic vitality of Silicon Valley, improve mobility options, reduce the environmental impacts of the transportation sector, and promote sustainable development. We appreciate being invited to participate in the Downtown/Diridon and Santa Clara Community Working Groups, and hope to have the opportunity to continue as partners moving forward. Please consider the following comments on the Draft SEIS/SEIR for VTA's BART Silicon Valley - Phase II Extension Project:

R4-1

1. We support the transit-oriented joint development (TOJD) alternative under consideration, as it would encourage higher-density, mixed-use development adjacent to our Santa Clara station. To ensure we are making the best use of limited urban space, we strongly encourage VTA to consider additional strategies to reduce parking demand associated with future TOJD at Santa Clara Station.

R4-2

2. Many ACE passengers walk and bike to Santa Clara and Diridon stations. We thank you for including appropriate mitigation measures to address bicycle and pedestrian access at these stations during construction. Please continue to engage ACE staff as part of your outreach efforts during construction, so we can inform our customers well in advance of any potential disruption to their commutes.

R4-3

3. ACE uses Track 1 at Diridon Station. Under the "Twin-Bore North" option, Track 1 would need to be taken out of service during construction of the new BART station, impacting ACE service and customers. ACE requests that if this option is

R4-4

Commissioners

Bob Johnson
City of Lodi

Bob Elliott
San Joaquin County

Steve Dresser
City of Lathrop

Debby Moorhead
City of Manteca

Leo Zuber
City of Ripon

Christina Fugazi
City of Stockton

Executive Director
Stacey Mortensen

Selected, VTA continue to coordinate with ACE to reduce impacts to service due to outage during construction. Also, as part of your Construction Education and Outreach Plan, please include a requirement for coordination with ACE well in advance of any service disruption.

R4-4,
cont.

4. Many ACE passengers transfer to VTA transit connections at Diridon Station, including the DASH shuttle to downtown. During construction, these transit connections and bus stops would be temporarily relocated, potentially impacting ACE riders. We thank you for including appropriate mitigation measures to address these impacts. Please continue to engage ACE staff as part of your outreach efforts during construction, so we can inform our customers well in advance of any potential disruptions to their commutes.

R4-5

Again, thank you for the opportunity to provide input in your environmental process. As your process moves forward, please involve our Santa Clara County outreach lead, Corinne Winter, as appropriate. She can be reached at [510-316-9049](tel:510-316-9049) or corinne@winter.associates.

Sincerely,


Stacey Mortensen

Response to Comment Letter R4

San Joaquin Regional Rail Commission (SJRRRC)

R4-1 This is a general, introductory comment. No response is necessary.

R4-2 SJRRRC's support of the BART Extension with TOJD Alternative is noted. As described in Volume I, Chapter 2, Section 2.3.3, *CEQA BART Extension with TOJD Alternative*, the proposed TOJD at Santa Clara Station would consist of a maximum of 500,000 square feet of office space with approximately 1,650 parking spaces, 30,000 square feet of retail with approximately 150 parking spaces, and up to 220 dwelling units with approximately 400 parking spaces on the 10-acre site. The number of parking spaces provided as part of the TOJD is based on meeting the City of Santa Clara parking requirements for residential and commercial land uses. Parking for BART riders is not included in the TOJD nor is shared parking with BART riders.

VTA will work in cooperation with the City of Santa Clara to consider strategies to reduce parking demand consistent with the City's requirements when the TOJD development plan is submitted for approval.

In early 2018, VTA will initiate the *VTA BART Phase II – TOD and Access Planning Study*. This Study will develop a plan to enhance multimodal access to the stations, including Santa Clara Station, to encourage a mode shift from private automobiles to alternative transportation modes by connecting the station areas to regional bike and pedestrian facilities. In addition, the Study will include a discussion of shared parking strategies to support successful implementation of TOD at the BART stations.

R4-3 As described in Mitigation Measures TRA-CNST-A: Develop and Implement a Construction Education and Outreach Plan, and TRA-CNST-B: Develop and Implement a Construction Transportation Management Plan, in Section 5.5.1, *Construction Outreach Management Plan*, VTA will develop and implement a Construction Education and Outreach Plan as well as a Construction Transportation Management Plan to address construction-period issues and inform the public and other stakeholders of the construction schedule and associated activities. The Construction Transportation Management Plan will specifically include details regarding coordination for vehicle, bike, pedestrian, and public transportation circulation during construction.

As detailed in Section 10.6, *Chronology of Coordination*, VTA has conducted several coordination meetings with SJRRRC through their participation in Diridon Operators Working Group Meetings as well as their attendance at the Santa Clara

Community Working Group meetings. VTA will continue work in cooperation with the SJRRC through the environmental, engineering, and construction phases.

- R4-4 Since the release of the Draft SEIS/SEIR, the station plan for the Diridon Station North Option (Twin-Bore) has been refined to avoid affecting the existing rail tracks at Diridon Station. Construction would be jack-and bore, tunneling, or another underground construction methodology that avoids the need to disrupt the track. Refer to Figure 2-A, *Alum Rock/28th Street Station Plan (Single-Bore)*, for the revised plan. Because of the change to the station plan and VTA's effort to avoid impacting the tracks, which was previously identified as a Significant and Unavoidable Impact, the impact on heavy rail during construction at Diridon Station under the North Option (Twin-Bore) would now be reduced to *No Impact*. This reduction in severity of the previously described impact has been made throughout the SEIS/SEIR.
- R4-5 See response to comment R4-3.



BOARD OF SUPERVISORS

SCOTT HAGGERTY
SUPERVISOR, FIRST DISTRICT

March 6, 2017

Thomas W. Fitzwater
Santa Clara Valley Transportation Authority
Environmental Programs and Resources
3331 North First Street, Building B-2
San Jose, CA

Subject: VTA BART Silicon Valley Phase II Extension Project – Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIR/SEIS)

Dear Mr. Fitzwater:

Thank you for the opportunity to review the Draft SEIR/SEIS for the proposed VTA BART Silicon Valley Phase II Extension Project. The Comprehensive Agreement between VTA and BART in connection with the proposed Santa Clara County BART Extension outlines specific terms regarding the VTA obligation to mitigate core system impacts. I am concerned that the Draft document does not provide sufficient documentation regarding how this obligation will be met. This concern includes all investments in the core system facilities that are needed to support and maintain the expansion into Silicon Valley. The project's impact on existing parking in East Alameda County, however, is of particular concern.

R5-1

VTA completed a Core System Impact Study in 2003 and a Core Stations Modification Study in 2011. This previous analysis indicated that Eastern Alameda County (Castro Valley, West Dublin & Dublin/Pleasanton Stations) would be areas of high parking demand for individuals wanting to ride BART to and from Santa Clara County. The potential for a total of 600 – 750 new parking spaces was identified for Eastern Alameda County to mitigate the impacts of Silicon Valley BART expansion in this area of the core system. Although the Phase 1 project is nearly complete, to-date there does not appear to be a commitment in place to mitigate parking displacement in Eastern Alameda County. It is of further concern that impacts identified in the previous studies were based on 2003 and 2011 BART ridership levels. These ridership numbers have increased significantly and parking and access is more impacted than ever in the Tri-Valley.

R5-2

The Bay Area's transportation and housing crisis requires us to be more collaborative and inclusive than ever before. As we advance the BART to Silicon Valley Project, we must be sure that policymakers at BART and VTA honor the commitments that have been made to mitigate project impacts on our communities in Eastern Alameda County and throughout the core BART District. The DEIS/DEIR must include an analysis of core system impacts that reflect current and projected conditions, and impacts must be fully mitigated.

R5-3

Sincerely,

Scott Haggerty
Alameda County Supervisor, First District

Response to Comment Letter R5

Alameda County Supervisor, First District

R5-1 VTA and BART are developing an Operations and Maintenance Agreement based on the principals of the 2001 Comprehensive Agreement between BART and VTA. Determination of responsibility for capital cost investments for the Core System and BART Silicon Valley Extension are included in the Operations and Maintenance Agreement in relation to ridership increases, regulatory changes, technology changes, rehabilitation, renovation, and replacement.

As stated in Section 7.1.3.2, *Area Plans/Studies*, under the heading, *Core Modification Study (#19)*, BART will develop a Capital Investment Program to identify the ongoing cost of capital investments for the BART Silicon Valley Extension and VTA's proportional share of the cost of capital investments for the Core System.

BART's Station Access Policy adopted in June 2016 considers Parking Management a secondary investment for auto reliant/dependent stations. Strategies include planning for system-wide access mode shift to reduce drive alone rates. BART prioritizes walking, biking, transit, and drop-off/pick-up ahead of new parking infrastructure as specified in the station access design hierarchy established in the 2016 Station Access Policy. When the parking demand equals or exceeds capacity, commuters are encouraged to use other modes to get to BART stations. BART and VTA have agreed that BART will develop a systemwide Capital Improvement Program related to overall station access outside of Santa Clara County. VTA will review the project list to identify BART core station improvements that will support BART ridership in Santa Clara County. Once these systemwide BART core station improvements have been identified, VTA would provide a fair-share contribution to implement the station access improvements.

R5-2 Please refer to response to comment R5-1.

R5-3 Please refer to response to comment R5-1.

County of Santa Clara

Roads and Airports Department

101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400



March 6, 2017

Tom Fitzwater
SVRT Environmental Planning Manager
VTA Environmental Programs & Resources Management
3331 North First Street, Building B-2
San Jose, CA 95134

**SUBJECT: Notice of Availability of Draft Supplemental Environmental Impact Statement/Report
BART Silicon Valley – Phase II Extension Project**

Dear Mr. Fitzwater:

The County of Santa Clara Roads and Airports Department appreciates the opportunity to review Draft Environmental Impact Statement/Draft Environmental Impact Report (Draft SEIS/SEIR) for the project cited above and is submitting the following comment(s):

1. In multiple sections, the DSEIR/S includes “Conversion of HOV lanes on Central Expressway to mixed-flow lanes between De La Cruz and San Tomas” as a planned and programmed roadway improvement. The Comprehensive County Expressway Planning Study 2008 Update states “Convert the Measure B HOV lane widening between San Tomas and De La Cruz to mixed flow if unsuccessful after a 3 to 5-year trial period”. In 2015, based on the results of the trial period, the project was updated and listed in Expressway Plan 2040 study as “Convert westbound HOV lane to mixed use lane; start eastbound HOV lane east of Scott”. Please reanalyze potential project impacts on Central Expressway without the eastbound HOV conversion and provide for County review. Should the revised analysis result in a significant impact, appropriate mitigation measures should be identified to address the impact. Mitigation measures listed in the TIA should be incorporated into the EIR document. R6-1
2. On page 3-100, the description under the mitigation measure TRA-A states, “Other than the change to the eastbound HOV lane already included in the planned roadway improvements, no feasible mitigation measures have been identified for the De La Cruz Boulevard and Central Expressway intersection. Therefore, the impact at this intersection would be significant and unavoidable under CEQA under Santa Clara and CMP criteria” R6-2

The proposed VTA and City of San Jose improvement at US 101/Trimble/De La Cruz interchange project should significantly improve conditions at Central/De La Cruz intersection and this should be considered as a feasible mitigation measure.

BART Phase 2- DSEIS/R
March 6, 2017
Page 2 of 2

If you have any questions or concerns about these comments, please contact me at (408) 573-2465 or Dawn.Cameron@rda.sccgov.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Dawn S. Cameron", with a long horizontal flourish extending to the right.

Dawn S. Cameron
Deputy Director, Infrastructure Development

cc: MA, AP, AB

Response to Comment Letter R6

Santa Clara County Roads and Airports

R6-1 This comment notes that the existing HOV lane on eastbound Central Expressway will be retained in the future east of Scott Boulevard. This is a change from the network assumption that was made in the analysis of the BART + TOJD Alternative at the intersections of Central Expressway/Lafayette Street and Central Expressway/De La Cruz Boulevard, based on the County's previous plan to convert the HOV lane to a mixed-flow lane at the time the environmental document was initiated.

At the County's request, these two intersections have been re-evaluated, assuming two mixed-flow lanes and one HOV lane on the eastbound approaches under 2035 Forecast Year conditions. This change to the lane configuration at both intersections did not result in a change to the findings presented in the SEIS/SEIR. At the intersection of Central Expressway/Lafayette Street, when "Plus Project" conditions are compared to "No Project" conditions, the level of service (LOS) would remain at LOS F but the project would not result in a significant impact in the AM or PM peak hours. At the intersection of Central Expressway/De La Cruz Boulevard, there would not be a significant impact in the AM peak hour, but there would be a significant impact in the PM peak hour, as there was when it was assumed there would be three mixed-flow, left-turn lanes. The level of service results for the re-analysis are included in BART Only TIA (November 2017).⁹ It should be noted that the analysis of the Phase II BART Alternative in both the BART Only TIA and the Draft SEIS/SEIR already included an HOV lane in the eastbound direction of Central Expressway east of Scott Boulevard, so no re-evaluation of that alternative was necessary.

Although the analysis presented in the Draft SEIS/SEIR has not changed, the following portions of the SEIS/SEIR have been revised accordingly to reflect the changes to the network assumptions.

In Volume I, Chapter 2, Section 2.2.1.2, *Roadway System*, under the heading, *Planned and Programmed Roadway Improvements Through 2035*, the 6th bullet presented in the list has been revised as follows:

- Central Expressway: Convert westbound HOV lanes to mixed-flow lanes between De La Cruz Boulevard and San Tomas Expressway.

Section 3.5.3.4, *Impact BART Extension + TOJD TRA-1*, under the subheading, *Intersections*, has been revised as follows:

⁹ Hexagon Transportation Consultants, Inc. 2017. *VTA's BART Silicon Valley—Phase II Extension Project Transportation Impact Analysis of the BART Extension Only*. November.

Mitigation Measures TRA-A through TRA-DC would be implemented for the three Santa Clara intersections identified above for which mitigation measures have been identified.

Mitigation Measure TRA-A: Implement Intersection Improvements at De La Cruz Boulevard and Central Expressway

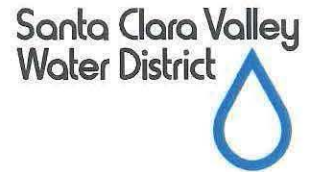
~~The Santa Clara County Department of Roads and Airports plans to convert the existing eastbound HOV lane to a mixed-use lane at this intersection, as shown in Chapter 2, Section 2.2.1.2, *Roadway System*, which lists planned roadway improvements. This modification was included as a change to the roadway network under 2035 Forecast Year BART Extension with TOJD conditions, and cannot be proposed as a mitigation measure.~~

~~Other than the change to the eastbound HOV lane already included in the planned roadway improvements, n~~No feasible mitigation measures have been identified for the De La Cruz Boulevard and Central Expressway intersection. Therefore, the impact at this intersection would be *significant and unavoidable* under CEQA under Santa Clara and CMP criteria. Proposed improvements at the nearby interchange of U.S. 101 and De La Cruz Boulevard-Trimble Road (which are a separate project of VTA and the City of San Jose) are expected to improve operations at the intersection of De La Cruz Boulevard and Central Expressway, but it is uncertain how much improvement would occur. State Congestion Management law requires a local jurisdiction to prepare a deficiency plan (now referred to as *Multimodal Improvement Plan* in the Santa Clara County CMP maintained by VTA) when roadway LOS standards are not maintained on the designated CMP system (California Government Code Section 65098.4). VTA maintains guidelines for the development of Multimodal Improvement Plans, which were developed in consultation with Member Agencies (i.e., the 15 cities of Santa Clara County and Santa Clara County) and last adopted by the VTA Board of Directors in September 2010. According to these guidelines, Multimodal Improvement Plans are prepared by Member Agencies in response to the transportation impacts of land use plans and development projects. The impact on this intersection would be a result of the TOJD component and not due to the BART Extension; however, VTA's guidelines do not address a situation where a land use project that is led by VTA contributes to an impact on a CMP facility. With this in mind, VTA commits to ~~work with the City of Santa Clara and Santa Clara County in the preparation~~ preparing of a Multimodal Improvement Plan for the identified impact on a CMP intersection and to

coordinating with the City of Santa Clara and Santa Clara County in its preparation.

These revisions to the SEIS/SEIR do not change the findings of the analysis presented in the Draft SEIS/SEIR.

- R6-2 The improvements planned by VTA and the City of San Jose at the Trimble Road/De La Cruz Boulevard interchange is a separate project and not part of VTA's BART Silicon Valley Phase II Extension Project. The improvements made by the U.S. 101/Trimble Road/Da La Cruz Boulevard project on U.S. 101 are expected to improve operations at the intersection of De La Cruz Boulevard and Central Expressway. However, the precise amount by which average delay at the intersection would be changed by those nearby interchange improvements is uncertain. Because of this uncertainty, it is conservative to assume that even with the nearby interchange improvements, the conclusion in the SEIS/SEIR that the project's impact would remain *significant and unavoidable* under CEQA has not been revised.



VTA ENVIRONMENTAL

2017MAR09 PM02:37

5750 Almaden Expressway, San Jose, CA 95118-3614 | (408) 265-2600 | www.valleywater.org

File: 26326
Various
X-Fac: Guadalupe River
Los Gatos Creek
Coyote Creek
Lower Silver Creek
Central Pipeline

March 6, 2017

Mr. Tom Fitzwater
BART Silicon Valley Environmental Planning Manager
VTA Environmental Programs & Resources Management, Building B-2
Santa Clara Valley Transportation Authority
3331 North First Street
San Jose, CA 95134

Subject: Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact (SEIS/SEIR) for the VTA's BART Silicon Valley Phase II Extension Project

Dear Mr. Fitzwater:

The Santa Clara Valley Water District (District) has reviewed the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact (SEIS/SEIR) for the VTA's BART Silicon Valley Phase II Extension Project received by the District on December 30, 2016.

The proposed project includes crossings of the District's Central Pipeline (Emory Street and Stockton Avenue); Los Gatos Creek; the Guadalupe River; and Lower Silver Creek. In addition, there is a crossing of Coyote Creek that is part of the District's Mid-Coyote flood protection project, which is still in the planning phase. Crossings of these of District's facilities will require a District permit as per the District's Water Resources Protection Ordinance. Additionally, the VTA will need to obtain license agreements and/or land rights for crossings of District fee title property, which require the District's Board of Directors approval, prior to issuance of permits and the start of construction. As such the District is to be considered a responsible agency under CEQA.

R7-1

Based on our review of the SEIS/SEIR we have the following comments:

1. Table 2-4 notes that a District encroachment permit is required for work that comes within a specified distance to any stream in the county. The District's Water Resource

R7-2



Protection Ordinance requires an encroachment permit for any work that occurs on District fee title property or easement and/or that impacts a District facility.	R7-2, cont.
2. The discussion of impacts to groundwater in refers to the need for dewatering during construction, but doesn't indicate whether it is anticipated that permanent dewatering will be required as part of the on-going operation of the proposed facilities.	R7-3
3. The discussion of impacts to groundwater flow notes the tunnel will be below the water table; and therefore, impacts will be minimal. However, the document doesn't note if the tunnel section will impact the deeper aquifer or if impacts will be limited to the shallow aquifer.	R7-4
4. According to the conceptual plans the tunneled section crossing the Guadalupe River would be within a few feet vertically to the existing wall along the Guadalupe River. Monitoring of the wall during tunneling operations should be part of the project to ensure the wall does not suffer damage due to construction.	R7-5
5. The discussion of flood impacts both in the main document and the Location Hydraulics Study is not clear regarding what is being analyzed in the TOJD with regards to impacts on the floodplain. If development will be occurring in the floodplains, that development will be subject to the local jurisdiction's flood plain ordinance. Additionally, if this development is above ground, removal of some structures as part the BART project will not necessarily mitigate for construction of additional structures within the floodplain.	R7-6
6. The flood impacts discussion doesn't specify that the project will conform to the local jurisdiction's flood plain ordinance.	R7-7
7. The discussion of flood impacts both in the main document and the Location Hydraulics Study uses the term "base flood plain" and in some instances Special Flood Hazard Areas (SFHA). FEMA mapping uses the term SFHA and it is unclear from the document whether "base flood plain" is meant to be interchangeable with SFHA. The document should be clarified and terminology should be consistently used throughout the document.	R7-8
8. The discussion of flood impacts both in the main document and the Location Hydraulics Study is unclear regarding the Lower Silver Creek floodplain. The referenced FEMA maps indicate the area is still mapped in a SFHA; however, the text of the document notes the areas northeast of the Highway 101 crossing of the creek are no longer in a floodplain. If this is a reference to the condition after the entire Lower Silver Creek Flood Protection Project is complete the text should clearly state that. Also, the text indicates after completion of the flood protection project all homes and businesses will be protected from the 1% annual chance flood; while this is the goal of the project there may remain some limited areas that are subject to flooding due to storm drain capacity constraints and/or topography.	R7-9
9. The discussion of impacts to the flooding notes that the impacts will be minimal and due to balancing of pre- and post-fill. In areas where fill and/or structures are placed within a SFHA a flood plain analysis should be completed to ensure impacts are addressed and that flooding depth or extents are not increased in areas adjacent to fill.	R7-10
10. The Location Hydraulics Study notes on page 2-7 that the Upper Guadalupe River Flood Protection Project was scheduled for completion in 2016. This project is on-going and completion is still a few years out.	R7-11
11. Section 5.5.16 Utilities lists in Table 5-9 that the District's Central Pipeline is within the project alignment and the tunnel will cross under it. The discussion however doesn't note if any of the major utilities listed in the table including the District's will require any relocation or note the potential impacts due to vibration from the tunneling operation and/or operation of the trains on the utilities. Baseline data on the pipeline condition at	R7-12

the start of construction needs to be documented and appropriate monitoring during construction should occur to ensure the pipeline does not suffer damage due the tunneling operation.

R7-12,
cont.

12. The project should utilize recycled water where possible for both indoor and outdoor uses.

R7-13

13. For landscaping in areas near the creeks, the Guidelines and Standards for Land Use Near Streams, should be used, in particular Design Guides 1-5 which discuss the use of native and ornamental species near the creeks.

R7-14

Please forward a copy of the Final SEIS/SEIR, as well as other project documents, as they become available for our review and comments. Reference District File No. 26326 on further correspondence regarding this project. If you have any questions or need further information, you can reach me at (408) 630-2322.

Sincerely,



Colleen Haggerty, P.E.
Associate Civil Engineer
Community Projects Review Unit

cc: C. Haggerty, S. Yung, File

26326_59176ch3-06

Response to Comment Letter R7

Santa Clara Valley Water District

R7-1 The tunnel bore depths below streams are presented in text in Volume I, Chapter 2, *Alternatives*. The following table summarizes the information provided therein.

Tunnel Bore Depth below Streams

Stream (project component)	Tunnel Bore Depth (to top of tunnel) Below Stream (in feet)
Lower Silver Creek (Twin-Bore)	25
(Single-Bore)	30
Coyote Creek (Twin-Bore)	20
(Single-Bore)	55
Guadalupe River (Twin-Bore ^a)	45
(Single-Bore ^a)	45 to 50
Los Gatos Creek (Twin-Bore ^a)	20 to 30
(Single-Bore ^a)	35 to 40
^a Applies to both Diridon Station South and North Options. Note: Some tunnel bore depths have been revised since release of the Draft SEIS/SEIR. This table presents the final tunnel depths presented in Volume I, Chapter 2, <i>Alternatives</i> , of this Final SEIS/SEIR.	

Specific issues regarding required permits and license agreement and/or land rights and coordination between VTA and SCVWD raised in the subsequent comments are responded to below.

R7-2 As identified in Table 2-4, *Required Permits and Approvals*, an encroachment permit will be sought from SCVWD if construction comes within specific limits of any Santa Clara County stream. Because construction will pass below streams, technically crossing under streams, VTA will apply for an encroachment permit from SCVWD prior to initiation of project activities on SCVWD's fee title property or easements, under streams in Santa Clara County, and for any activities that could potentially impact an SCVWD facility, per the SCVWD's Water Resource Protection Ordinance.

R7-3 Permanent dewatering may be necessary as part of the ongoing operation in portions of the tunnel in addition to the temporary construction dewatering. Potential groundwater impacts are discussed in Section 4.17.4.2 under the subheading, *Groundwater*, which has been revised as shown in the response to

comment R7-4. BART Facilities Standards require that tunnels be waterproofed and limit infiltration rates in underground structures; however, some groundwater infiltration into facilities is inevitable and it must be removed. Accordingly, the second paragraph in Chapter 5, Section 5.5.18.3, *Groundwater*, has been revised as follows:

The groundwater table is anticipated to be encountered during the excavation for construction of the underground stations and tunnel structures. ~~As a result, dewatering of the shallow groundwater zone would be required during excavation activities, and permanent dewatering may be necessary as part of the ongoing operation in portions of the tunnel as outlined in Section 4.17.4.2, *Groundwater*.~~ However, BART Facilities Standards require that tunnels be waterproofed and limit infiltration rates in underground structures during ongoing operations. Thus, the BART Extension would not substantially deplete groundwater supplies or substantially interfere with groundwater recharge because it would not increase groundwater demand or decrease groundwater recharge areas. Although dewatering may be necessary during construction and as part of the ongoing operation of the facilities, methods to address dewatering include a well-based dewatering system and/or the pumping of water from the excavation and tunnel using pumps in low spots. As a result, there is potential for reducing the volume of water in the shallow local aquifer table during construction. However, dewatering would be on a temporary basis during the construction phase and would not result in a loss of quantities of water that would deplete groundwater supplies in either the construction or the operations phase.

These revisions to the SEIS/SEIR do not change the findings of the analysis presented.

- R7-4 The tunnel would affect shallow aquifers at the portals and at the cut and cover sites temporarily during construction dewatering; however, this comment was directed specifically about the tunnel alignment. The Geotechnical Memorandum (February 2014) identifies deep sand- and gravel-bearing soil types below the groundwater table or “aquifers.” Accordingly, this information has been added to Section 4.17.4.2, *BART Extension Alternative*, under the *Groundwater* subheading, fourth paragraph:

Tunnel structures and underground stations may temporarily affect groundwater flow direction and pathways, resulting in the diversion of the normal flow of groundwater, the mounding of groundwater upgradient of the aforementioned facilities, or a localized rise in the water table. ~~To minimize these adverse effects, highly permeable gravel channels and/or slotted PVC pipes would be placed in areas where water would be routed around a sealed tunnel to minimize effects on groundwater paths and directions. In addition, t~~ Tunnels would be constructed below the water table, at a minimum depth of

20 feet below ground at the tunnel crown (WRECO 2017~~6a~~). The Geotechnical Memorandum (February 2014) identifies deep sand- and gravel-bearing soil types that are below the groundwater table or “aquifers.” The impervious tunnel may temporarily affect these deeper aquifers during construction whether earth pressure balance or slurry TBM is utilized. Groundwater flow paths in the subsurface are interconnected in a complex way, with multiple sand and gravel lenses connecting in the subsurface to form deeper aquifers. These interconnected systems have not been comprehensively mapped by any agency, but extend outside the diameter of the tunnel bore(s). The groundwater flow paths within the aquifers surround the tunnel alignment and would not be blocked by the tunnel based on the depths of the deposits. Groundwater flows would thus naturally adjust around the tunnel after boring. BART Facilities Standards require that tunnels be waterproofed and limits infiltration rates in underground structures; however, some groundwater infiltration into facilities is inevitable and it must be removed. Removing the groundwater infiltrated into the tunnel would not result in a loss of quantities of water that would deplete deeper aquifer groundwater supplies. Therefore, groundwater would be able to flow above and/or below the tunnel structure BART facilities and structures, and the mounding of groundwater upgradient from the tunnel structure is not anticipated. If any fill material this is placed during construction fails to provide adequate permeability, additional drainage design features could be applied.

These revisions to the SEIS/SEIR do not change the findings of the analysis.

- R7-5 The Guadalupe River retaining wall extends approximately 40 feet below the riverbed. Response to comment R7-1 provides the tunnel depth at the Guadalupe River as 45–50 feet for all alternatives. VTA will monitoring existing structures, including the retaining wall during the construction phase to ensure the wall does not suffer damage in accordance with Mitigation Measure GEO-CNST-C, in Section 5.5.9, *Geology, Soils, and Seismicity*, which includes pre- and post-construction settlement monitoring of the structures near streams along the settlement trough.
- R7-6 The TOJDs structures would be above ground and may be located within a floodplain. In the event TOJDs are located within a floodplain, the development would be subject to the local jurisdiction’s floodplain ordinance. Required permits and approvals are summarized in Table 2-4, *Required Permits and Approvals*. The following portions of the SEIS/SEIR have been revised accordingly to include references to local floodplain ordinances and additional requirements mentioned in the ordinances.

The first and second paragraphs under *Floodplains*, in Section 4.17.4.2, *BART Extension Alternative*, have been revised as follows:

Several areas in the vicinity of the alignment crossing for the Alum Rock/28th Street Station are within the base floodplain. Ground parking, system facilities, and station entrances and roadway improvements are entirely within the floodplain of Coyote Creek/Lower Silver Creek and occupy a total of approximately 9.25 acres....Station features would have a floor elevation of 2 to 3 feet above the base flood elevation, depending on whether the feature is deemed non-critical or critical per Executive Order 13690 and the San Jose floodplain ordinance. Critical facilities such as traction power substations, gap breaker stations, train control and communication buildings, and vent shaft openings, would be set above the 0.2 percent annual storm event...The flood flow pattern would be maintained as much as possible by incorporating and providing a flow-through area in the station campus, especially in the parking areas. Per the San Jose floodplain ordinance adequate drainage paths to guide flood waters around and away from the structures will be implemented. Storage and detention would be implemented as necessary to make up for storage lost as a result of the BART Extension (WRECO 2017**6**b).

The area of the structures within the base floodplain is insignificant compared with the overall floodplain area for Coyote Creek/Lower Silver Creek (approximately 28,160 acres). Therefore, the BART Extension Alternative would not significantly change the base floodplain water surface elevation (WSE) at Alum Rock/28th Street Station....In addition, after completion of work at all six reaches of the Lower Silver Creek Flood Protection Project, SCVWD and the City of San Jose will be able to demonstrate to FEMA that all homes and businesses that are subject to a 1 percent annual chance flood from Lower Silver Creek have been protected. However, the BART Extension Alternative would remain within the base floodplain because this area is within the commingled floodplain of both Lower Silver Creek and Coyote Creek and would be designed to comply with the San Jose floodplain ordinance.

The fourth paragraph under *Impact BART Extension WQ-6: Expose people or structures to a risk of flooding*, in Section 6.15.5.2, *BART Extension Alternative*, has been revised as follows:

SCVWD, in cooperation with the Natural Resources Conservation Service and the Guadalupe Coyote Resource Conservation District, proposed an approximately 4.4-mile-long section of Lower Silver Creek, between its confluence with Coyote Creek and Lake Cunningham, for flood protection related to a 1 percent annual chance event....However, the area south of Lower Silver Creek remains within the base floodplain because this area is

within the blended floodplain of both Lower Silver Creek and Coyote Creek and the BART Extension Alternative would comply with the San Jose floodplain ordinance. Work on Reaches 4 through 6 is ongoing and will run through December 2017....

The second paragraph under *Impact BART Extension + TOJD WQ-6: Expose people or structures to a risk of flooding*, in Section 6.15.5.3, *BART Extension with TOJD Alternative*, has been revised as follows:

The Alum Rock/28th Street Station TOJD would be within the Alum Rock/28th Street Station campus, which occupies approximately 5.09 acres and is entirely within the floodplain of Coyote Creek/Lower Silver Creek. However, the BART Extension with TOJD Alternative would remove adjacent buildings that currently occupy approximately 1.07 acres, also within the same floodplain. The BART Extension with TOJD Alternative would add approximately 0.77 acre of AIA to the floodplain area...However, the BART Extension with TOJD Alternative would remain within the base floodplain because this area is within the commingled floodplain of both Lower Silver Creek and Coyote Creek and would comply with the San Jose floodplain ordinance. ~~In addition, m~~Minimization measures would be implemented at the Alum Rock/28th Street Station (e.g., balancing fill and storage capacity, providing a flow-through area) to ensure that floodflow is maintained. In accordance with the San Jose floodplain ordinance within Zones AH and AO adequate drainage paths around the structures to guide floodwaters around and away from the structure would be proposed. The same minimization measures for Alum Rock/28th Street Station should be used for the Alum Rock/28th Street Station TOJD. These include minimizing fill in the floodplain, maintaining flood storage capacity, and proposing that the floor elevation of all buildings should be above the base flood elevation of 89 feet (NAVD 88) as stated in the San Jose floodplain ordinance....

These revisions to the SEIS/SEIR do not change the findings of the analysis. In addition, Section 3.3.3 of the Location Hydraulic Study has been revised to include similar additions of local floodplain ordinances.

- R7-7 The project will comply with local jurisdiction's floodplain ordinances. Required permits and approvals are summarized in Table 2-4, *Required Permits and Approvals*. Also, refer to response to comment R7-6.
- R7-8 Per the request of the SCVWD, definitions for these terms have been clarified in Section 4.17.2.1, *Environmental Setting*, under the subsection *Flooding*, first paragraph, as follows:

Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) were used to identify the base floodplain, or the area with a 1

percent annual chance of an exceedance event, within the limits of the BART Extension Alternative. The BART Extension Alternative area contains ~~all~~ FIRM Special Flood Hazard Area (SFHA) or base floodplain categories (i.e., zones AE, AO, A, and AH, D, X [shaded], and X [unshaded]) and Zones D, X (shaded), and X (unshaded), as shown in Figures 4.17-2 through 4.17-5. Zone AE is within the 100-year floodplain zone and represents areas with a 1 percent chance of flooding (Base Flood Elevations determined). Zone AO is within the 100-year floodplain zone and represents areas with a 1 percent chance of shallow flooding (usually sheet flow on sloping terrain), with specified flood depths of 1 to 3 feet usually in areas of ponding (Base Flood Elevations determined). Zone A represents areas with a 1 percent annual chance of flooding (base flood elevations have not been determined for this zone). Zone AH is within the 100-year floodplain zone and represents areas with a 1 percent annual chance of shallow flooding, with specified flood depths of 1 to 3 feet. There are also portions of the BART Extension Alternative within Zone D, Zone X (shaded), and Zone X (unshaded); these areas are not considered base floodplains, and no analysis of flood hazards has been conducted. Possible but undetermined flood hazards can occur within Zone D; ~~this areas is not considered a SFHA, and no analysis of flood hazards has been conducted.~~ Zone X (unshaded) includes areas where minimal flooding can occur, with elevations higher than areas with a 0.2 percent annual chance of flood event. Zone X (shaded) is an area with a moderate flood hazard, usually the area between the limits of 100- and 500-year floods (includes areas affected by a 0.2 percent annual chance of flood) (WRECO 2017**6b**).

These terms will be used consistently throughout the document. As such, the following portion of the SEIS/SEIR has been revised for consistent terminology use.

The fifth paragraph under *Floodplains*, in Section 4.17.4.2, *BART Extension Alternative*, has been revised as follows:

Some of the station options (~~Alum Rock/28th Street Station, Downtown San Jose Station East Option and Downtown San Jose West Option, and Diridon Station South Option and Diridon Station North Option~~) would be underground and therefore would not extend into floodplain...However, the BART Extension Alternative would remove adjacent buildings that currently occupy approximately 0.16 acre. There would be approximately 0.24 acre of additional building structures within Zone D. Within Zone D, flooding is undetermined but possible; this zone is not considered ~~an SFHA or a base floodplain...~~

These revisions to the SEIS/SEIR do not change the findings of the analysis.

- R7-9 See response to comment R7-6 for revisions to the SEIS/SEIR in regards to the discussion of flood impacts on Lower Silver Creek as a result of the project.
- Following completion of the Lower Silver Creek Flood Protection Project, refinements to the minimization measures, as discussed in Section 6.15.5.3, *BART Extension with TOJD Alternative*, may be made during subsequent design phases of the project in coordination with the SCVWD and City of San Jose to minimize and avoid potential localized flooding.
- R7-10 As described in the impact analysis in Sections 4.17 and 6.15, *Water Resources, Water Quality, and Floodplains*, and in the Location Hydraulic Study (November 2017)¹⁰ there would be minimal fill in floodplains as a result of the BART Extension and BART Extension with TOJD Alternatives. Five of the stations options (Alum Rock/28th Street Station, Downtown San Jose Station East and West Options, and Diridon Station South and North Options) would be underground and would not extend into floodplain. The Santa Clara Station would be aboveground; however, the Santa Clara Station would be within flood Zone X (shaded [an area of moderate flood hazard]), and no BART Extension features would be within the 100-year floodplain. Some TOJD features would be located within floodplain areas, but this impact would be offset because existing buildings would be removed and therefore would not change the base floodplain water surface elevation of these areas. In other words, the flooding depth or extents would not be increased. Therefore, additional floodplain analysis is not necessary.
- R7-11 This comment on the anticipated schedule for the Upper Guadalupe River Flood Protection Project has been noted. The timing of the completion of the Upper Guadalupe River Flood Protection Project does not change the impacts analyzed in the SEIS/SEIR.
- R7-12 Table 5-9, *Major Utility Locations along the BART Extension Alignment*, identifies major utilities (utility lines that are at least 36 inches in diameter) crossed by the BART alignment. SCVWD's Central Pipeline is included in the eighth row of Table 5-9 and is identified as a 66-inch diameter high-pressure water line constructed of prestressed concrete and steel located under Emory Street in the vicinity of the BART alignment.
- As described in Section 5.5.16, *Utilities*, relocation of utilities would be performed in advance of construction. VTA will engage in ongoing coordination with SCVWD and other utility providers during the final project design and engineering and construction phases to identify and address potential conflicts and determine whether utilities would be protected-in-place or relocated. Specific relocation methodologies will be identified during final project design and engineering in consultation with SCVWD to minimize disruptions to service. In

¹⁰ WRECO. 2017. *VTA's BART Silicon Valley—Phase II Extension Project Location Hydraulic Study*. November.

addition, Mitigation Measures GEO-CNST-C: Monitor Ground Surface during Tunneling Activities, and GEO-CNST-E: Implement Preconstruction Condition Surveys for Utilities, described in Chapter 5, Section 5.5.9, *Geology, Soils, and Seismicity*, have been added to the list of actions to be implemented to minimize utility disruptions during project construction. These mitigation measures are now referenced in Section 5.5.16.1, *Relocation of Existing Utilities*.

To avoid or minimize disruptions in service, the following practices ~~would~~ will be implemented.

- VTA ~~will~~would continue to coordinate with utility providers throughout the design and construction phases of the BART Extension ~~Alternative~~ to locate existing utilities, identify potential conflicts in the construction area, and formulate strategies to avoid unscheduled service interruptions.
- A set of detailed plans for the BART Extension ~~Alternative~~would will be submitted to utility providers for their review and comment prior to the onset of any utility relocation work.
- Underground utilities that do not need to be relocated either temporarily or permanently ~~would~~ will be uncovered and reinforced, if necessary, and supported in place during construction ~~by hanging from support beams spanning across the excavation.~~
- Property owners, residences, and businesses ~~would~~ will be notified of major utility relocations.
- Mitigation Measure GEO-CNST-C will monitor the ground surface during tunneling to minimize adverse effects during tunneling activities.
- Mitigation Measure GEO-CNST-D will monitor ground movements from construction activities to minimize settlement effects from cut-and-cover excavations.
- Mitigation Measure GEO-CNST-E will identify and monitor utilities considered potentially at-risk due to BART construction.
- Mitigation Measure NV-CNST-P will require implementation of a construction vibration control and monitoring plan to minimize vibration effects during construction activities.
- Mitigation Measure TRA-CNST-A will develop and implement a Construction Education and Outreach Plan prior to construction.
- Mitigation Measure TRA-CNST-B will develop and implement a Construction Transportation Management Plan to coordinate circulation and access during construction.

- Mitigation Measure TRA-CNST-C will prepare and implement an Emergency Services Coordination Plan to minimize impacts on local emergency service routes and response times during construction.

R7-13 Recycled water would be used for project construction dust suppression and operations to the maximum extent practicable. VTA will work with both the Cities of San Jose and Santa Clara to be consistent with the jurisdiction's general plan policies related to recycled water use. These applicable general plan policies are presented in Section 6.13.2.2, *Local*, and include Policy MS-19.4 in Envision San Jose 2040 General Plan; and Policies 5.10.4-P3, 5.10.4-P6, and 5.10.4-P8 in the City of Santa Clara 2010–2035 General Plan.

In addition, Volume I, Section 2.2.2.3, *Sustainability Strategies*, has been revised as follows:

- **Water.** There are numerous well-established ways to save water, reduce stormwater flooding, and improve water quality in landscape design that are directly applicable to station areas and potentially to BART trackways....If access to the San Jose and Santa Clara recycled water networks is available, then recycled water could be used ~~for station landscaping~~ where possible for both indoor and outdoor uses.

R7-14 VTA will work with SCVWD to ensure that planting activities, including restoration and landscaping, and erosion control hydroseed mix application at locations near and along streams will be consistent with SCVWD's Guidelines and Standard for Land Uses Near Streams.

In addition, the following text has been added to Volume I, Section 2.2.2.3, *Sustainability Strategies*, following the Water bullet:

- **Replacement and New Landscaping.** Replacement and new landscaping on VTA ROW will comply with VTA's Sustainable Landscaping Policy, which emphasizes native and drought tolerant plantings.

The following text has also been added as the last paragraph to Mitigation Measure AES-CNST-A: Replace Trees in Section 5.5.17, *Visual Quality and Aesthetics*.

For any landscaping adjacent to the creeks and on VTA ROW, VTA will adhere to the SCVWD's Guidelines and Standards for Land Use Near Streams regarding the use of native species near the creeks.



SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT

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2017

Rebecca Saltzman
 PRESIDENT

March 6, 2017

Robert Raburn
 VICE PRESIDENT

Mr. Tom Fitzwater
 Santa Clara Valley Transportation Authority
 3331 North First Street, Building B
 San Jose, CA 95134-1927

Grace Crunican
 GENERAL MANAGER

DIRECTORS

Re: BART Comments on Draft SEIS/SEIR

Debora Allen
 1ST DISTRICT

Dear Mr. Fitzwater:

Joel Keller
 2ND DISTRICT

BART congratulates VTA on reaching the important milestone of issuing the Draft Supplemental EIS/Subsequent EIR (SEIS/SEIR) for the second phase of the Silicon Valley Rapid Transit (SVRT) project. BART appreciates the extraordinary level of effort needed to issue this document and move this project forward. This is an important project for the Bay Area as it connects workforce housing with the job centers of Silicon Valley, and would enable the region to ring the Bay with rail. BART has several comments on the overall project that we would like to go on record with at this point.

Rebecca Saltzman
 3RD DISTRICT

Robert Raburn, Ph.D.
 4TH DISTRICT

John McPartland
 5TH DISTRICT

Thomas M. Blalock, P.E.
 6TH DISTRICT

Newhall Yard – The project as outlined in Chapter 2 (Alternatives) in the Draft SEIS/SEIR includes a rail vehicle storage and maintenance facility at Newhall Yard. BART considers this facility to be an essential element of the project, without which the project could not go forward. The document lays out the necessary functions to be performed at the yard and the equipment needed to perform those functions.

Lateefah Simon
 7TH DISTRICT

Nicholas Josefowitz
 8TH DISTRICT

Bevan Dufly
 9TH DISTRICT

BART needs to stress the importance of the facility to the operational functioning of the Santa Clara Extension, and to BART’s ability to maintain the extension in a state-of-good-repair and to provide the level of service and reliability expected by residents and businesses in Santa Clara County. BART is aware that some advocates for the project have questioned the need for the Newhall Yard. BART can categorically state that the project is not viable without the yard, and there is no project without the yard.

R8-1

Tunnel construction method and configuration – The BART system has been in operation since 1972, and BART is an essential element of the public transportation system in the region. All of BART’s tunnel and tube segments are twin-bore configuration, and BART’s operations, maintenance and safety procedures are all set up for twin-bore tunnels. BART has participated in the studies and discussions looking at a single bore option for the tunnel through San Jose, and understands the desirability of some of the outcomes possible with a single-bore tunnel during the construction period. BART has some serious concerns with the single-bore configuration, including the passenger experience using stations that are much deeper than standard (adding travel time), reduced platform width for passenger safety, fire/life safety concerns with the

R8-2

time needed to reach a point-of-safety from deep stations, and the lifecycle and operating costs to operate and maintain the extensive ventilation systems needed for the deep tunnels and to provide interior points-of-safety for emergency situations. BART understands that VTA is seeking to approve both options in the environmental process, and BART will continue to work with VTA as the project moves forward to make the decision on tunneling methodology. From BART's perspective, there are significant concerns that must be addressed prior to a decision on tunnel methodology. Best practices also suggest that it is important to wait for the results of the Risk Analysis before making a final decision on the tunneling method.

R8-2,
cont.

Transit-supportive station area and access planning

For the project to realize its full potential to increase transit ridership, catalyze transit-supportive economic development in and around the station and support the surrounding communities, a comprehensive and integrated approach utilizing best practices in transit design, multi-modal access and transit-supportive development will be critical. We encourage VTA to work closely with the Cities of San Jose and Santa Clara to initiate and fund a detailed implementation-oriented station area planning program—that includes adopted transit-supportive zoning, capital improvements, etc.—to supplement the scope of the access and TOD planning for Alum Rock/28th St, Downtown and Santa Clara Station scheduled to begin this fall. We also encourage VTA to consider the passenger experience in designing key transfer connections between modes, such as at San Jose Diridon Station. BART looks forward to participating in the process this fall, and welcomes the opportunity to share our expertise as well as lessons learned from our 40+ years of experience.

R8-3

San Jose Downtown Station options - BART prefers the West Option for the downtown San Jose station, due to the closer proximity to the employment centers in San Jose, and the better transit connections to VTA's light rail system. BART understands that construction of this option may be more expensive in order to reduce impacts on light rail operations during construction, however, we feel that the long term benefits of having the more westerly location outweigh the downsides. Research has shown that office workers are highly sensitive to walk distance from transit. BART notes that during the construction of the original BART system, the San Francisco Municipal Railway kept streetcar operation above the Market Street cut-and-cover station construction work going for the entire period of BART construction.

R8-4

Railcars - BART notes that the Draft SEIS/SEIR lists 48 cars as the number of additional railcars required for Phase 2. This number resulted from the operating plan developed in 2010, and represented the best number available at the time. BART has recently received new scheduling software (Viriato), which has the ability to model the BART system at a more detailed level, and the results show that 60 cars are needed to operate the Phase 2 extension. BART anticipates working with VTA over the next few months to confirm the number of railcars needed for the extension.

R8-5

Please call Duncan Watry in BART Planning at (510) 287-4840 if you have any questions.

Sincerely,



Robert Powers
Deputy General Manager

cc: Dominique Paukowits, FTA Region 9

Response to Comment Letter R8

San Francisco Bay Area Rapid Transit (BART)

- R8-1 BART's emphasis on the need for Newhall Maintenance Facility is noted and VTA will continue to coordinate with BART on this facility. All alternatives considered in the SEIS/SEIR include Newhall Maintenance Facility element.
- R8-2 VTA, in coordination with BART, undertook the *BART Silicon Valley, Phase II Single Bore Tunnel Technical Studies* (HNTB 2017) and prepared the *BART Silicon Valley Extension Phase II Tunneling Alternatives Comparative Analysis, Independent Risk Assessment* (Aldea Service, LLC 2017) to evaluate both Twin-Bore and Single-Bore Options as the tunnel construction methodology.

These assessments were presented to VTA's Board of Directors for its consideration at the August 25, 2017, and September 22, 2017, workshops. As explained in Volume I, Section 2.A.4, *Timeline for Future Option Decisions*, the decision regarding selection of the preferred tunnel construction methodology will be made when the VTA Board of Directors certifies the Final SEIS/SEIR and approves the project in early 2018.

Ventilation and self-evacuation are the most important components to limiting fire hazard exposure. The studies found that the single-bore ventilation design meets current applicable codes and standards. The cross sectional area within the tunnel requiring ventilation is similar to that of twin-bore due to the usage of center walls and slabs between the two tracks. Additionally, calculations indicate that the ventilation fans and motors required for the single-bore configuration are comparable in size to those required in the current twin-bore design.

In regard to platform width and capacity, the design for the station platform for the single-bore tunnels would have two 15-foot 6-inch unobstructed platforms (one per level) equating to approximately 21,700 total square feet of unobstructed area and exceeding current BART passenger-per-square-foot standards. At Diridon Station post-event surge from SAP Center events may be accommodated via patron staging in entrance facilities and concourse area of a single-bore option. In addition, the ability to have more crossovers or areas to store trains with the single-bore design allows for flexibility of operations in the extension and potential to clear platforms faster.

The single-bore concept design includes 76 emergency egress passages (51 configured side-by-side and 25 that include a stairwell) for emergency situations within the tunnel. The spacing is 300 feet between passages along most of the alignment. The increase in the number of emergency egress passages decreases the evacuation time.

The single-bore ventilation system provides adequate fire hazard mitigation and meets National Fire Protection Association (NFPA) 130's 4-minute and 6-minute evacuation criteria for clearing the platform and arriving to Point(s) of Safety, an area established from the platform edge entering the connection adit (between the platform and the station headhouse vertical circulation structure/entrance shaft), and throughout the entrance shaft along egress paths, in this single-bore configuration. The Point(s) of Safety are considered long-term safety zones due to the configuration of the single bore and the ventilation system design. Egress calculations demonstrate that evacuation flows, including queuing for pedestrian flows at the base of stairs and escalators, comply with design standards for the platform to clear in four minutes and station occupants to reach Point(s) of Safety within six minutes.

VTA and BART jointly conducted a peer review in November 2017 with public transit agencies currently operating heavy rail subway systems. The peer review include panelists from public transit agencies and a facilitator. Two of the key questions posed were whether the single-bore tunnel could be operated safely as an extension of the BART system, and what risks and challenges are associated with the single-bore configuration. The panel concluded that the Single-Bore Option as presented could be operated. However, the panel identified key operational considerations related to fire/life/safety that would need to be addressed in the design. This peer review was not determinative, but will help inform VTA's decision-making process for the selection of tunnel construction methodology along with the environmental studies and other factors. Refer to Volume I, Section 2.A.4, *Timeline for Future Option Decisions*, regarding next steps.

R8-3 During the current environmental phase, VTA has determined the tunneling methodology and established the station entrance locations and configurations. Once VTA's Board of Directors approves a recommended project, staff will complete a *VTA BART Phase II – TOD and Access Planning Study* that will consider the passenger experience for all modes accessing the station. The study will include a Technical Advisory Group, which the Cities of San Jose and Santa Clara as well as BART will be a part of. The study will span from early 2018 through 2019, and will include public and stakeholder engagement throughout the process. As detailed in Section 10.6, *Chronology of Coordination*, VTA has conducted several coordination meetings with the City of San Jose and the City of Santa Clara. VTA will continue to work in cooperation with both cities through the environmental, engineering, and construction phases. Section 5.5.2.7, *Diridon Station (South and North Options)*, was revised to include information on agency coordination for the Diridon Transportation Facilities Master Plan.

R8-4 BART's preference for the West Option at Downtown San Jose Station is noted. The analysis presented in the SEIS/SEIR regarding the options for Downtown San

Jose Station will inform VTA's Board of Directors for their consideration on a recommended project to be carried in the Final SEIS/SEIR.

- R8-5 The SEIS/SEIR analysis is based on a service plan. VTA will work with BART to confirm the number of railcars needed to operate the Phase II Extension, and update the fleet management plan accordingly.

Hufana, Leialani O

From: Swan, Samantha
Sent: Wednesday, February 14, 2018 2:36 PM
To: Hufana, Leialani O
Subject: FW: Draft Supplemental EIR for the BART Phase II Extension project
Attachments: Non-CPO Referral Response to NOA SDEIR.DOC

From: Hettenhausen, Michael [mailto:michael.hettenhausen@PRK.SCCGOV.ORG]
Sent: Monday, September 18, 2017 3:26 PM
To: bartphase2eis-eir <bartphase2eis-eir@vta.org>
Cc: Orange, Cherise <cherise.orange@PRK.SCCGOV.ORG>
Subject: Draft Supplemental EIR for the BART Phase II Extension project

Hello Mr. Fitzwater,

Santa Clara County Parks provided the attached comments previously as we are interested in the Draft Supplemental EIR for the BART Phase II Extension project and how it may impact the proposed Five Wounds Trail, Lower Silver Creek Trail, and Bay Area Ridge Trail as well as the two existing Guadalupe River and Los Gatos Creek trails. Can you let me know if these trails are included in the Draft Supplemental EIR?

Thanks,

Michael

Michael Hettenhausen, Associate Planner
Santa Clara County Parks | 298 Garden Hill Drive | Los Gatos, CA 95032
(408) 355-2362 | parkhere.org



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Conserve paper. Think before you print.

County of Santa Clara

Parks and Recreation Department

298 Garden Hill Drive
Los Gatos, California 95032-7669
(408) 355-2200 FAX 355-2290
Reservations (408) 355-2201
www.parkhere.org



January 5, 2017

Mr. Tom Fitzwater
VTA Environmental Programs & Resource Management, Building B-2
3331 North First Street
San Jose, CA 95134

Subject: Notice of Availability of Draft Supplemental Environmental Impact Report for the BART Phase II Extension Project

Dear Mr. Fitzwater:

The County of Santa Clara Parks and Recreation Department (“County Parks Department”) is in receipt of the Notice of Availability of Draft Supplemental Environmental Impact Report for the BART Phase II Extension Project. In regard to this proposed project, the County Parks Department’s comments are primarily focused on potential impacts related to the *Santa Clara County Countywide Trails Master Plan Update* relative to countywide trail routes, public access, and regional parks.

The DSEIR should include a discussion related to the *Santa Clara County Countywide Trails Master Plan Update*, an element of the Parks and Recreation Section of the County General Plan that the Board of Supervisors adopted on November 14, 1995. The *Countywide Trails Master Plan Update* indicates three planned trail routes (Five Wounds Trail, Lower Silver Creek Trail, and Bay Area Ridge Trail) and two existing trails (Guadalupe River Trail and Los Gatos Creek Trail) within the vicinity of the project site. The DSEIR should describe each trail and evaluate the potential impacts to each trail as a result of the project.

The evaluation should include an analysis of the aesthetics/visual impacts of the proposed project on the existing and planned trails as well as any access impacts to these trails. Please include a description of appropriate mitigation measures to reduce impacts of the proposed project to the trails. Finally, the DSEIR should address soil erosion control measures, air quality and emissions, water quality, noise, glare, pollution, and other issues associated with grading and construction

activities and potential impacts that the proposed project may have on the local creeks as they relate to the existing and planned trails.

R9-1,
cont.

Thank you for the opportunity to comment on the Notice of Availability of Draft Supplemental Environmental Impact Report for the BART Phase II Extension Project. If you have any questions regarding these comments, please feel free to contact me at (408) 355-2362 or via email at Michael.Hettenhausen@prk.sccgov.org.

Sincerely,

Michael Hettenhausen

Michael Hettenhausen,
Associate Planner

Response to Comment Letter R9

Santa Clara County Parks and Recreation Department

R9-1 The project consists of an underground transit system, including the following project elements with aboveground features: four stations, two mid-tunnel ventilation structures, system facilities, two tunnel portals, and an end-of-the-line maintenance facility. Three proposed trail routes (Lower Silver Creek Trail, Five Wounds Trail, and Bay Area Ridge Trail/Coyote Creek Trail) and two existing trails (Los Gatos Creek Trail and Guadalupe River Trail) are located in the project vicinity.

Full funding for the proposed Lower Silver Creek Trail, Five Wounds Trail, and Coyote Creek Trail/Bay Area Ridge Trail (the proposed extension in proximity to the project) has not yet been identified; consequently, it is not reasonable or foreseeable that these proposed trails would be constructed and operational/occupied by trail users prior to construction of the project. Therefore, the project's construction impacts on these future trails are not anticipated and are not discussed in detail in the SEIS/SEIR. The project would not preclude the planning/implementation of these trails in the future. VTA will work with the City of San Jose and the County of Santa Clara to ensure that implementation of the BART Extension would not impede implementation of, or preclude the construction and use of, the future/proposed trails.

The proposed and existing trails are described and discussed in Section 4.4.4.2, *BART Extension Alternative*, Section 6.5.5.2, *BART Extension Alternative*, Chapter 5, *NEPA Alternatives Analysis of Construction*, and Chapter 8, *Section 4(f)*, of the Final SEIS/FEIR. No change to the SEIS/SEIR is required. A summary of potential project impacts on these trails and local creeks as they relate to the existing and proposed trails is provided below. The trails are listed in order from east to west.

Lower Silver Creek Trail Extension

The proposed Lower Silver Creek Trail extension within proximity to the project is in the early conceptual stages, and currently no funding has been identified. The trail would cross over the alignment of the BART Extension perpendicularly south of Las Plumas Avenue, north of McKee Road, and just west of U.S. 101. The BART Extension would be underground in a tunnel configuration at the location where the proposed trail extension would cross the project alignment. Construction of the tunnel would be at least 45 feet below ground surface at this location; therefore, the project would not cause any impacts on the creek or the

proposed trail extension at the surface, should the trail be implemented in the future.

A construction staging area (CSA) is proposed west of U.S. 101 near Lower Silver Creek as shown on Figures 5-2, *Proposed Mabury Road and U.S. 101 Construction Staging Areas (Revised)*, and 5-3, *Proposed Alum Rock Construction Staging Areas (Revised)*, in Chapter 5. This CSA will provide storage of rail during construction of the tracks at the at-grade portion of the project north of the East Tunnel Portal. The proposed CSA is within a former UPRR railroad alignment, now owned by VTA, that formerly crossed over Lower Silver Creek at grade. The railroad bridge that crossed Lower Silver Creek at grade burned down during a fire in 2016. Since the Draft SEIS/SEIR was released in late 2016, the CSA for the project at this location was revised to remove the CSA on the bridge over the creek, as shown in Figures 5-2 and 5-3. Therefore, the CSA is outside the bed and bank of Lower Silver Creek.

The Final SEIS/SEIR describes soil erosion control measures, air quality and emissions, water quality, noise, glare, pollution, and other issues associated with grading and construction activities and potential impacts of the proposed project in the associated sections of Chapter 6, *CEQA Alternatives Analysis of Construction and Operation*. Specifically, soil erosion, water quality, and pollution control measures are described in Section 6.15, *Water Resources, Water Quality, and Floodplains*, including Sections 6.15.2, *Regulatory Setting*, and 6.15.5, *Environmental Consequences*. Implementation of Mitigation Measures WQ-A (described in Section 6.15.5) and HAZ-CNST-A (described in Section 6.10, *Hazards and Hazardous Materials*) and adherence to City of Santa Clara and City of San Jose General Plan policies, a stormwater pollution and prevention plan (SWPPP), the Construction General Permit, and VTA's *Stormwater and Landscaping Design Criteria Manual* as applicable would reduce potential effects related to water quality, groundwater supply or recharge, drainage patterns, erosion, flood risk, and water resources to a *less-than-significant* level. Therefore, no adverse impacts on Lower Silver Creek are anticipated.

Five Wounds Trail

The Five Wounds Trail is proposed to be developed along an inactive railroad within right-of-way (ROW) owned by VTA along the west side of 28th Street near the proposed Alum Rock/28th Street Station. The trail is in the early conceptual stages, and currently no funding has been identified. Since the property is owned by VTA, development of the trail is not planned or programmed to be constructed after VTA completes the BART Extension construction activities in this area. Therefore, construction of the project would not result in construction-related impacts on Five Wounds Trail. The project has been designed to avoid precluding the future construction of the Five Wounds Trail. As part of the design for North

28th Street, the BART Extension would accommodate the future construction of Five Wounds Trail between Santa Clara and Julian Streets between Santa Clara and Julian Streets as stated in Section 3.5.3.9, *Impact BART Extension + TOJD TRA-6: Conflict with Transit, Bicycle, or Pedestrian Policies, Plans, or Programs*.

Coyote Creek Trail Extension /Bay Area Ridge Trail

As noted on Table 4.4-2, *Parks and Recreational Facilities within the Study Area*, of the Final SEIS/SEIR, the *Coyote Creek Trail, Story Road to Lower Silver Creek Master Plan* was released in 2008. Final design of this segment is currently ongoing; however, no funding and no construction commencement date have been identified. The proposed Bay Area Ridge Trail and the Coyote Creek Trail are separate trails, but their proposed alignments overlap within the footprint of the project at Santa Clara and 17th Streets. The closest existing portion of the Coyote Creek Trail is approximately 1 mile southwest of Alum Rock/28th Street Station. There are intervening roadways and existing residential, commercial, and industrial development between the project and the existing segment of the Coyote Creek Trail. Due to the distance and intervening existing uses between the project and this existing segment of the Coyote Creek Trail, impacts on the trail are not anticipated.

The proposed trail alignments would be overlapping where they cross over the BART Extension alignment at Santa Clara Street just east of 17th Street. Within this area, the project would consist of a tunnel at least 50 feet below Coyote Creek. At this depth, no project construction and operational impacts are anticipated on the trail, should it be implemented in the future.

The overlapping trail alignments of the proposed Coyote Creek Trail and Bay Area Ridge Trail would also be in proximity to the project north of U.S. 101 and south of Mabury Road near proposed construction staging areas for the storage and laydown of construction materials for the BART Extension. Storage and laydown of construction materials will be restricted to areas outside of the bed and bank of Coyote Creek. Similar to the Lower Silver Creek Extension, the construction mitigation measures in the SEIS/SEIR for soil erosion control, air quality and emissions, water quality, noise, glare, and other issues associated with grading and construction activities of the proposed project would apply. With the implementation of these measures, effects related to water quality, groundwater supply or recharge, drainage patterns, erosion, flood risk, and water resources would be reduced to a *less-than-significant* level under CEQA. No adverse impacts on Coyote Creek are anticipated under NEPA.

Guadalupe River Trail

Of the trails discussed in this response, only the Guadalupe River Trail is operational and crosses the alignment of the project. The trail crosses the project's alignment just west of SR-87 and south of Santa Clara Street. At this location, the project consists of a tunnel alignment at least 40 feet below the ground surface and a construction staging area proposed at grade under SR-87 within an existing parking lot as shown on Figure 5-7, *Proposed Diridon Station North Construction Staging Area (Revised)*. At a depth of at least 65 feet below the surface, construction and operation of the tunnel would not cause noise or vibration impacts on the trail.

The construction staging area located under SR-87 would provide a staging and laydown area for the storage and staging of construction materials and equipment for the BART Extension. The CSA is outside the bed and bank of the creek and outside the trail ROW. No construction equipment or materials would be stored within the trail. Use of the adjacent parking lot under SR 87 as a CSA would not adversely affect the park, and noise and vibration generated by the storage of materials and equipment during construction would not impact trail use. No noise or vibration impacts on the Guadalupe River Trail during construction or operation of the project are anticipated; therefore, mitigation is not required.

The SEIS/SEIR describes soil erosion control measures, air quality and emissions, water quality, noise, glare, pollution, and other issues associated with grading and construction activities and potential impacts that the proposed project in the associated sections of Chapter 6. Specifically, soil erosion, water quality, and pollution control measures are described in Sections 6.15.2 and 6.15.5. Implementation of Mitigation Measures WQ-A (described in Section 6.15.5) and HAZ-CNST-A (described in Section 6.10) and adherence to City of Santa Clara and City of San Jose General Plan policies, a SWPPP, the Construction General Permit, and VTA's *Stormwater and Landscaping Design Criteria Manual* as applicable would reduce potential effects related to water quality, groundwater supply or recharge, drainage patterns, erosion, flood risk, and water resources to a *less-than-significant* level. Therefore, no impacts on the Guadalupe River Creek or trail are anticipated.

Section 6.14.4.2, *BART Extension Alternative*, of the Final SEIS/SEIR states that trees would be removed as needed within CSAs and at the station areas, tunnel portals, mid-tunnel ventilation facilities, and systems facilities. However, no trees would be removed from within the existing Guadalupe River Trail. Also, although construction of the project has the potential to temporarily add new elements to the visual landscape due to the presence of construction equipment and materials and light and glare from night time work, the contractor will implement techniques to minimize potential visual effects. These techniques would include

maintaining construction areas in an orderly manner, including proper containment and disposal of litter and debris to prevent dispersal onto adjacent properties and roadways. Construction crews working at night would direct any artificial lighting onto the work area to minimize spillover of light or glare onto adjacent areas. Although construction activities would last up to 8 years, they would be phased throughout the alignment. So, the duration of construction at the Guadalupe River Trail and Creek would be less than 8 years. Therefore, for the reasons listed above, adverse visual impacts on the Guadalupe due to construction are not anticipated.

Air quality impacts and mitigation are addressed in Section 6.3.4, *Environmental Consequences and Mitigation Measures*. Construction would result in a significant, unavoidable impact due to exceedance of Bay Area Air Quality Management District (BAAQMD) air quality standards at the major areas of construction activities, including the four stations. Mitigation measures are described in Section 5.5.3, *Air Quality*. This significant unavoidable impact is a conclusion based on the analysis of construction happening at all project locations simultaneously. Construction activities would be concentrated at the locations described in Table 5-3, *Construction Emissions Related to the BART Extension Alternative*. These construction activities were estimated to include the operation of up to 20 pieces of heavy-duty construction equipment and both haul and concrete truck deliveries for up to 16 hours a day, which produce emissions that affect air quality. The closest two locations of concentrated construction activities with the potential to affect the Guadalupe River Trail are at least 900 feet away at Diridon and Downtown San Jose Stations. Diridon Station is located 900 feet to the west, and the Downtown San Jose Station West Option is located almost 1,800 feet to the east. Concentrated construction activities expected at these two stations are not anticipated at the SR-87 CSA because the CSA will only be used for the storage and laydown of construction equipment and materials. Therefore, the adverse air quality impacts would not result from the use of the SR-87 CSA as a storage and laydown area, and the Guadalupe River Trail would not be impacted by air pollutant emissions.

As stated in Sections 4.4.4.2 and 6.5.5.2, although the project may lead to increased usage of the Guadalupe River Trail, the project is considered in both VTA's *Valley Transportation Plan 2030*, and in San Jose's *Diridon Station Area Plan* Environmental Impact Report. Together, these planning documents propose multimodal circulation improvements to accommodate transit users near the Diridon and Downtown San Jose Stations.

For the reasons listed above, and as described in Sections 4.4.4.2 and 6.5.5.2, implementation of the project would not adversely affect the Guadalupe River Trail.

Los Gatos Creek Trail and Proposed Trail Extension

As noted on Table 4.4-2, *Parks and Recreational Facilities within the Study Area*, of the Final SEIS/SEIR, the proposed Reach 5 of the Los Gatos Creek Trail would extend north from the existing Los Gatos Creek Trail to intersect with the Guadalupe Creek Trail at Santa Clara Street. The *Los Gatos Creek Trail Reach 5 Master Plan* was released in 2008. Final design of this segment is currently ongoing. No funding and no construction commencement date have been identified. The proposed extension of Los Gatos Creek Trail that would cross over the alignment of the project would be located south of Santa Clara Street just east of Autumn Street. The project alignment would be in a tunnel configuration in this area and would pass beneath Los Gatos Creek at a depth of over 35 feet or more. At this depth, the project would not result in construction or operational impacts on the proposed trail in the area, should the trail be implemented in the future.

As mentioned above, the closest existing section of the Los Gatos Creek Trail to the project is approximately 1/3-mile away from Diridon Station. Existing residential neighborhoods and industrial land uses are located between the existing Los Gatos Trail segment and the project; therefore, construction impacts on this existing trail are not anticipated.

In addition to the tunnel alignment, the Diridon Station (South Option) is also proposed in proximity to Los Gatos Creek, and the proposed trail as shown in Figure 5-8, *Proposed Diridon Station South Option Construction Staging Area*. During construction, storage of construction materials and equipment, and active construction activities will take place outside of the bed and bank of the creek.

The SEIS/SEIR describes soil erosion control measures, air quality and emissions, water quality, noise, glare, pollution, and other issues associated with grading and construction activities and potential impacts of the proposed project in the associated sections of Chapter 6. Specifically, soil erosion, water quality, and pollution control measures are described in Section 6.15, *Water Resources, Water Quality, and Floodplains*, including Sections 6.15.2 and 6.15.5. Implementation of Mitigation Measures WQ-A (described in Section 6.15.5) and HAZ-CNST-A (described in Section 6.10) and adherence to City of Santa Clara and City of San Jose General Plan policies, a SWPPP, the Construction General Permit, and VTA's *Stormwater and Landscaping Design Criteria Manual* as applicable would reduce potential effects related to water quality, groundwater supply or recharge, drainage patterns, erosion, flood risk, and water resources to a *less-than-significant* level. No adverse impacts on Los Gatos Creek are anticipated.

Lastly, Chapter 8, *Section 4(f)*, discusses the Lower Silver Creek Trail (proposed), Five Wounds Trail (proposed), Guadalupe River Park and Trail, and the Los Gatos Creek Trail (proposed). These trails are also discussed in the *Section*

4(f)/6(f) Technical Report and its corresponding Errata. Chapter 8 and the supporting technical report conclude that no direct use, temporary occupancy, or constructive use of any of the trails listed above would result from implementation of the proposed project.