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Hon. Pauline Russo Cutter, Chair, Commission Members, and Staff
Alameda County Transportation Commission
1111 Broadway, Suite 800
Oakland, CA 94607

RE: Oppose Reallocating $400 Million of Measure BB Funds to Valley Link Rail Project (TVSJVRRA)

The "Valley Link" rail connector project is an intriguing effort to connect the far-flung San Joaquin Valley and Tri-Valley areas with the San Francisco Bay Region's urban core. Any project that gets more commuters out of automobiles is usually worthy of the Alameda County Transportation Commission's (ACTC's) consideration — butnot this one. Not now.

I am a Bay Area native. I grew up in Redwood City with steam-powered Southern Pacific commute trains. I have served on the BART Bicycle Advisory Task Force (BBATF) since 2011 and now serve as its Vice chair — although these comments are mine alone and are not made on behalf of the BBATF. I have been active in City of Alameda transportation and planning issues for 22 years and worked on regional transportation solutions.

INADEQUATE PUBLIC NOTICING FOR THIS COMMENT PERIOD

First, proponents of the relatively new Valley Link rail connector project are asking ACTC to reallocate $400 million for a project that was never even on the 2014 Measure BB project list — or on any transit funding ballot measure. This alone is troubling to someone like me who worked hard to pass Measure BB.

Secondly, this request is coming before you with very limited public notice or input and almost no publicity — a glaring omission. Had I not stumbled on discussions of this ACTC reallocation and the Valley Rail project — on Twitter — within the past week I would not have known that $400 million in Measure BB funds were about to be reallocated for a project I had never heard of before. Where did this come from? Frankly, it reminds me of the mid-19th-century promoters who built rail lines across the United States (and across the island of Alameda) in pursuit of real estate profits.

Thirdly, I was unable to find a way to submit public comment on the ACTC website. For that, I had to ask others who knew about the project and the looming close of public comment that opened May 28 — in the midst of the pandemic's shutdown. What happened to the ACTC's once-effective and hard-to-miss public noticing process? And where is the careful consideration of the Valley Link project's potentially massive negative impacts on the region, including sprawl, energy use, and global climate change that should precede major funding?

NO ENVIRONMENTAL IMPACT REPORT, TOO MANY SPRAWL-RELATED RISKS

Valley Link has not undergone a full environmental analysis: there is no Environmental Impact Report (EIR) on the rail project's effects on exurban sprawl, climate change, or its potential harm to open space and agricultural land by stimulating the building of more McMansions on the San Joaquin Valley farmlands. Nor is there any detailed evaluation of other land use, transportation, and economic alternatives, such as extending some form of BART service to Livermore — much less re-focusing on building affordable, high-density housing in the urban core areas where the jobs exist.

Does the Alameda County Transportation Commission (ACTC) want to accelerate exurban sprawl? This project appears to guarantee that much more housing will be built on what is now open space and agricultural land, further diminishing those resources. To significantly improve sustainability and create a greener California while reducing energy use, global warming, and sprawl, we would halt home construction so far from our workplaces and re-establish traditional patterns of living close to work and stop enabling more super-commuting road warriors — or even rail warriors.

Before the Valley Rail project received any public funding, policies must be established to ensure that only higher-density, compact growth will be allowed in these outlying areas: it is fruitless to build a transit system to serve sprawling tracts of McMansions whose low densities do not support transit.

The additional demand on BART and the mechanism for funding BART's added costs should also be detailed ahead of making large expenditures like this.

These broad policy and priority discussions need to take place before public funds are committed to any transit project that promises to blow up what remains of "compact growth" initiatives throughout the Bay Area and the mega-region. The Valley Rail project's overall impacts on growth and additional sprawl in the exurbs and suburbs must be very carefully calculated <u>before</u>, not after, such a project is funded.

A QUESTIONABLE FUNDING STREAM: SALES TAX REVENUE IN THE PANDEMIC AND ONLINE SHOPPING ERA

We are in the middle of a viral pandemic with no end in sight — partly because of federal failures in leadership.This new Valley Link project is asking for $400 million in sales tax revenue that may never exist because of the pandemic-caused economic crisis on top of a long-term drop in “brick and mortar” retail sales.

With future sales tax revenues in doubt and our existing metropolitan transit systems already in crisis, the $400 million should remain unspent, be reallocated to support other voter-approved Measure BB projects, or be used to support existing transit agencies and service. For decades, BART pursued an ”expansionist” policy to the detriment of maintaining and improving its core system and original infrastructure: ACTC and other transportation stakeholders should learn from BART’s strategic mistake. In conclusion, there are too many questions about the overall costs and environmental effects of the Valley Rail (TVSJVRRA) proposal, especially the great likelihood of sharply increasing exurban sprawl far beyond the nine-county Bay Region. Many more large-scale policy and planning decisions need to be made before we further expand the costly and unsustainable mega-commute. And without a stable local retail economy or stable existing transit agencies, ACTC should not engage in expansionist, sprawl-inducing projects.

Please do not reallocate Measure BB funds to Valley Link/TVSJVRRA at this time.

Respectfully submitted,

Jon M. Spangler