

JPB CAC

CORRESPONDENCE
AS OF

January 17, 2023

Givens, Patrice

From: Roland Lebrun <ccss@msn.com>
Sent: Wednesday, January 11, 2023 9:46 AM
To: Transbay Info
Cc: SFCTA Board Secretary; MTABoard@SFMTA.com; Board (@caltrain.com); BART Board; SFCTA CAC; TJPA CAC; cacsecretary [@caltrain.com]; cac@sfmta.com
Subject: TJPA 1/12 Board Item 14 DTX 2018 SEIR CEQA Addendum
Attachments: Item 14 DTX 2018-FSEIR-2022 Addendum.pdf

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Dear Chair Gee and Board members,

Please find my comments attached for your consideration.

Sincerely,

Roland Lebrun

CC

SFCTA Board of Directors
SFMTA Board of Directors
Caltrain Board of Directors
BART Board of Directors
SFCTA CAC
SFMTA CAC
TJPA CAC
Caltrain CAC

Roland Lebrun
ccss@msn.com
January 11, 2023

2018 FSEIR Addendum

Dear Chair Gee and Board members,

Here are my comments on the staff recommendation:

- 1) Staff's conclusion that changes to the project since the 2018 FSEIS/EIR are "*minor in nature*" and "*do not trigger a supplemental EIR*" fails on two counts, specifically:
 - The reduction from three to two tunnel tracks does "*result in mitigation measures or alternatives previously found to be unfeasible becoming feasible*".
 - The reduction from two to three tunnel tracks does "*result in the availability/implementation of mitigation measures or alternatives that are considerably different from those analyzed in the previous document, which would substantially reduce one or more significant effects on the environment*".
- 2) **The mined tunnel is not constructible as designed**
- 3) Train box extension poses an existential threat to Next Transbay Rail Crossing (LINK21)
- 4) **Proposed 4th track at Mission Bay Drive violates Caltrain engineering standards**
- 5) BART/MUNI connector development should be advanced immediately by transferring responsibility for project delivery to BART and MUNI.
- 6) Fourth & Townsend station redesign introduces a single point of failure

- 1) **Staff's conclusion that changes to the project since the 2018 FSEIS/EIR are "minor in nature" and do not require a supplemental EIR fails on two counts, specifically:**
 - The reduction from three to two tunnel tracks does "result in mitigation measures or alternatives previously found to be unfeasible becoming feasible".
 - The reduction from two to three tracks does "result in the availability/implementation of mitigation measures or alternatives that are considerably different from those analyzed in the previous document, which would substantially reduce one or more significant effects on the environment".

Please refer to the February 24 2021 Polechronis memo which characterized the 7th Street alignment alternative as unfeasible because:

"The two single-track tunnels proposed would constrain operations, create safety risks, and pose maintenance challenges. In February 2018, SFCTA's peer review panel, made up of five construction, operations, and maintenance experts, identified a need for three tracks into and out of the station to allow for anticipated operational inconsistencies without affecting train travel up and down the Peninsula main line"

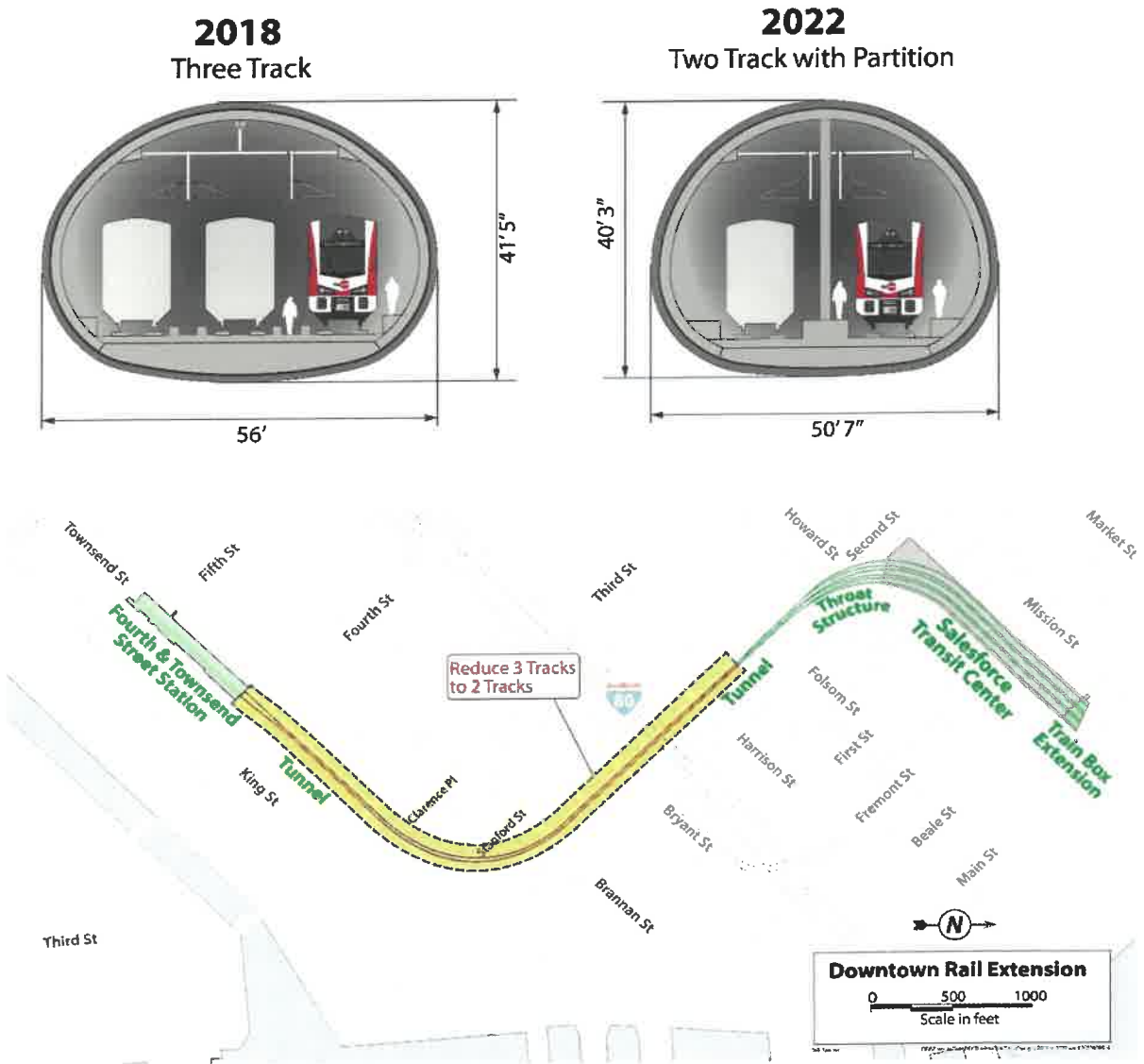
https://tjpa.org/uploads/2018/04/Item15_SFCTA-Peer-Review-of-DTX-Operational-Studies.pdf."

Please also consider the following "mitigation measures or alternatives that are considerably different from those analyzed in the previous document, which would substantially reduce one or more significant effects on the environment" as follows:

- **Elimination of Second & Howard cut & cover throat structure**
- Elimination of impacts on 2nd Street between Natoma and Townsend
- Elimination of impacts on the Townsend transit shed between Second & Seventh
- **Elimination of SECOND existential threat to the northern throat connection to LINK21**
- Restoration of six (6) full-length (1,400-foot) platforms
- **Restoration of six (6) thru-tracks**
- **Seamless integration with the PAX**
- Seamless (AKA "Vision Zero") integration with the Central Subway N/T3rd Mission Bay Loop
- **Elimination of impacts on the Prologis/Caltrain right of way.**

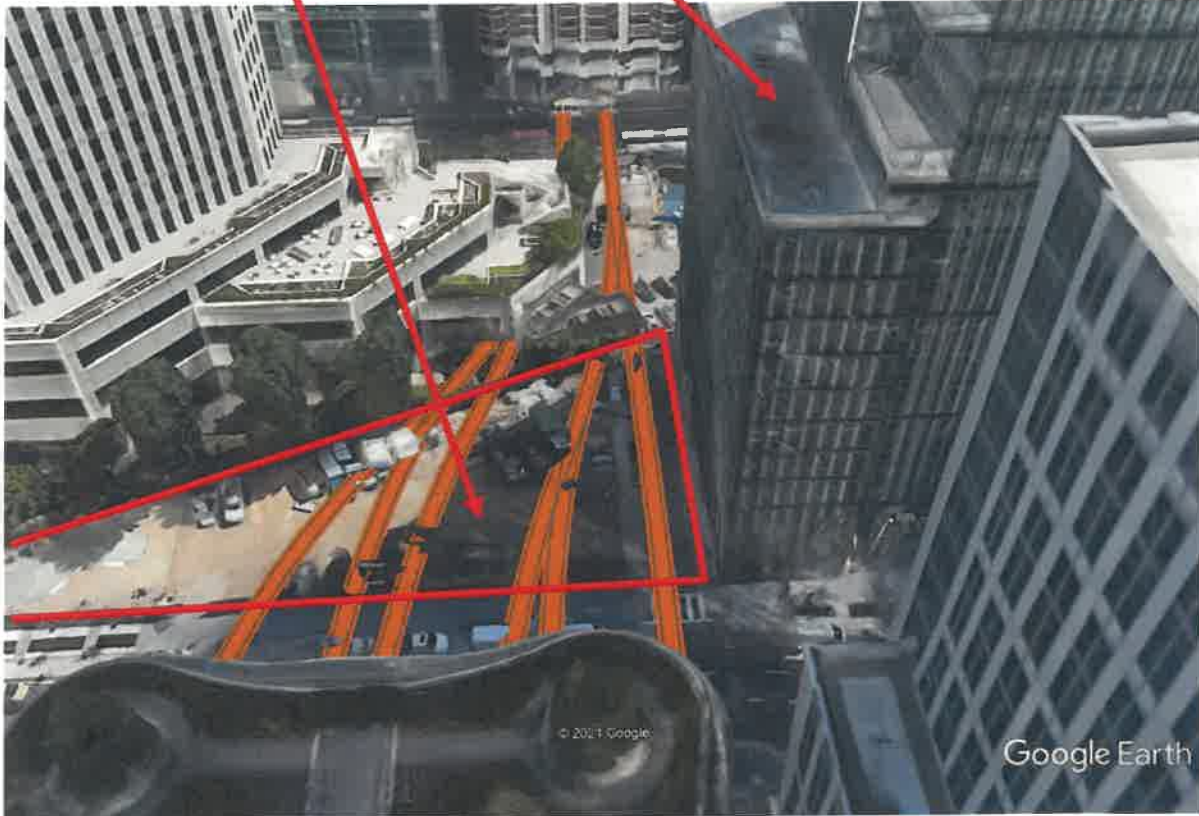
2) The mined tunnel is not constructible as designed

While the revised tunnel design is a welcome life/safety improvement (addition of walkways separated by a firewall), it is not constructible either as a mined tunnel (insufficient ground cover in incompetent soils) or a single-bore tunnel (sharp curve at Second & Townsend)



3) Train box extension poses an existential threat to Next Transbay Rail Crossing (NTRC)

This is the second time the TJPA have carelessly imperiled the viability of a future East Bay connection, starting with the disposal of “Block 5” for \$175M to fund Phase I cost overruns back in 2015 (“Block 5” was a Phase II parcel reserved for the environmentally cleared NTRC Howard alignment).



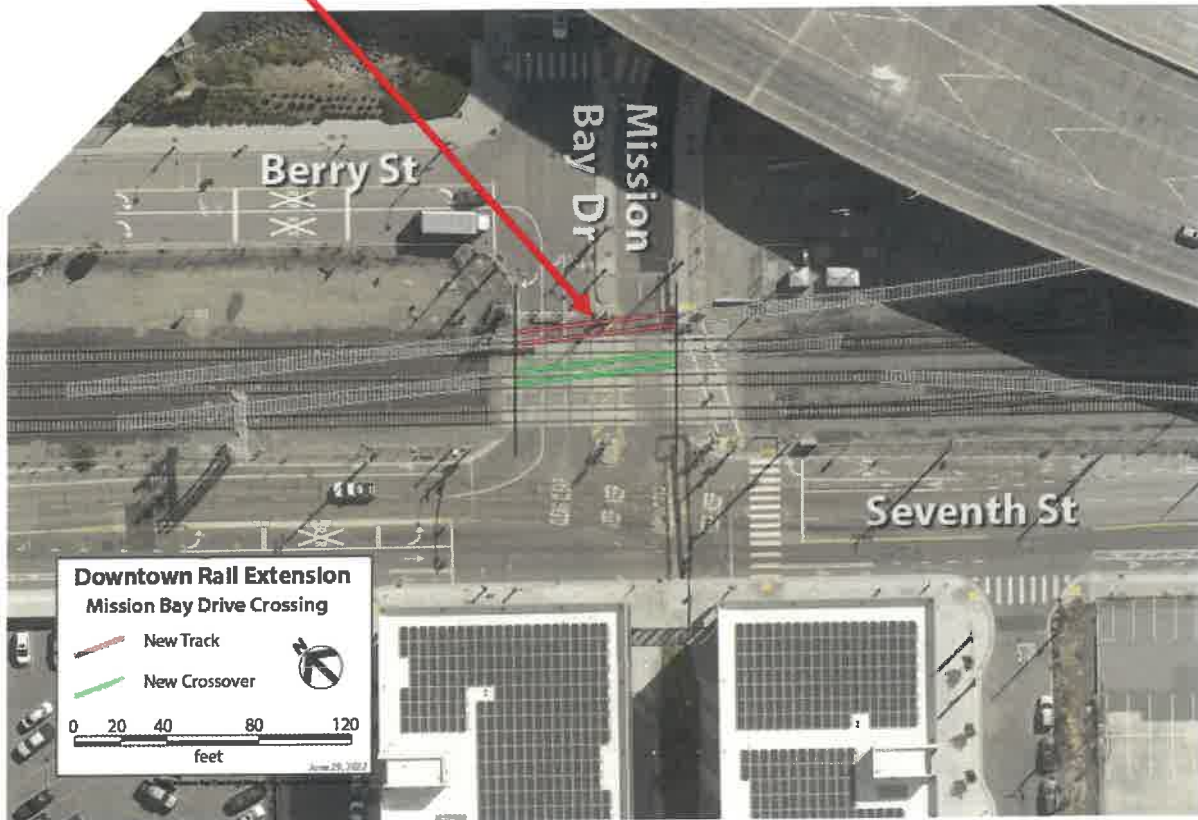
Recommendation

Transfer responsibility for the development of the train box extension, the intercity bus facility and the taxi staging area to an SFCTA/MUNI/BART/DPW partnership responsible for designing and delivering the NTRC (LINK21) section between Beale Street and Embarcadero.

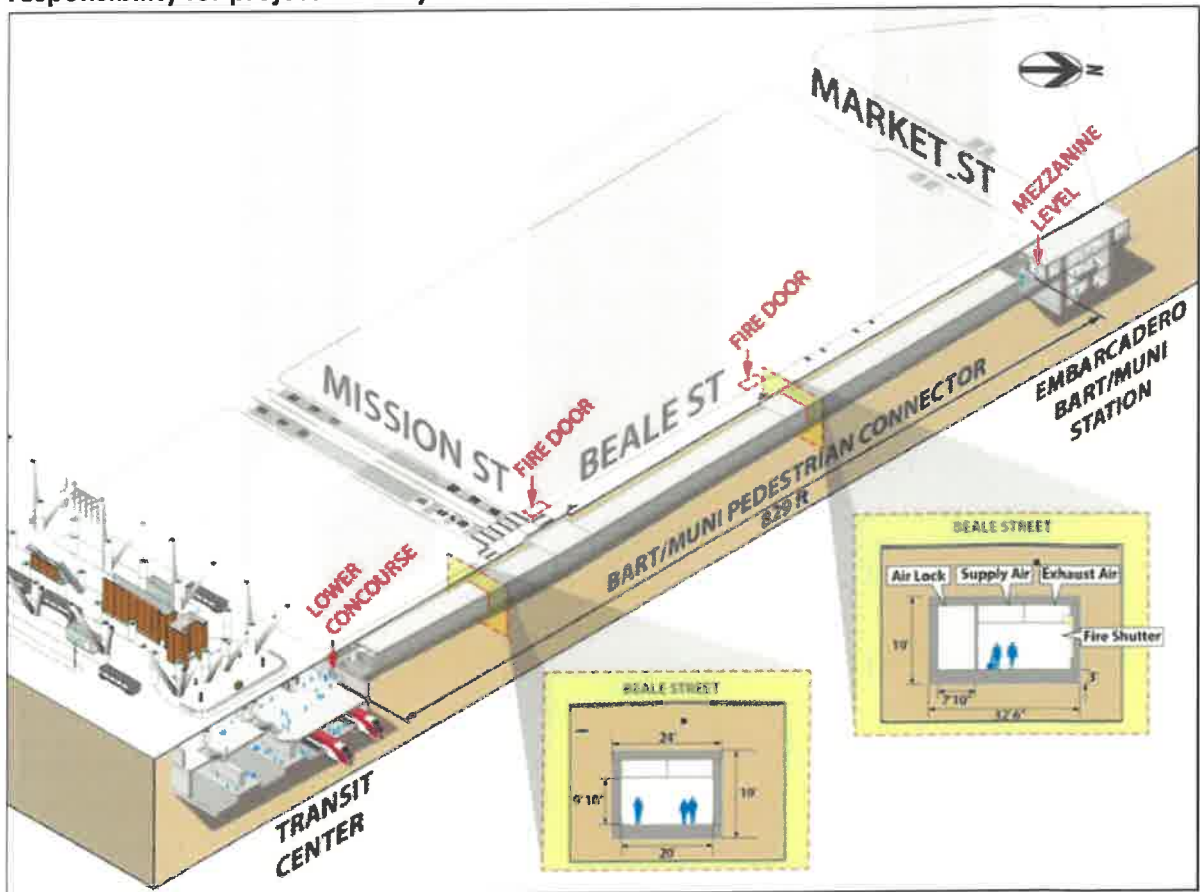
4) Proposed 4th track at Mission Bay Drive violates Caltrain engineering standards

"Caltrain does not have and does not allow at-grade crossings where there are four tracks."

Caltrain Engineering Standards Chapter 7 Grade crossings (Page 28)

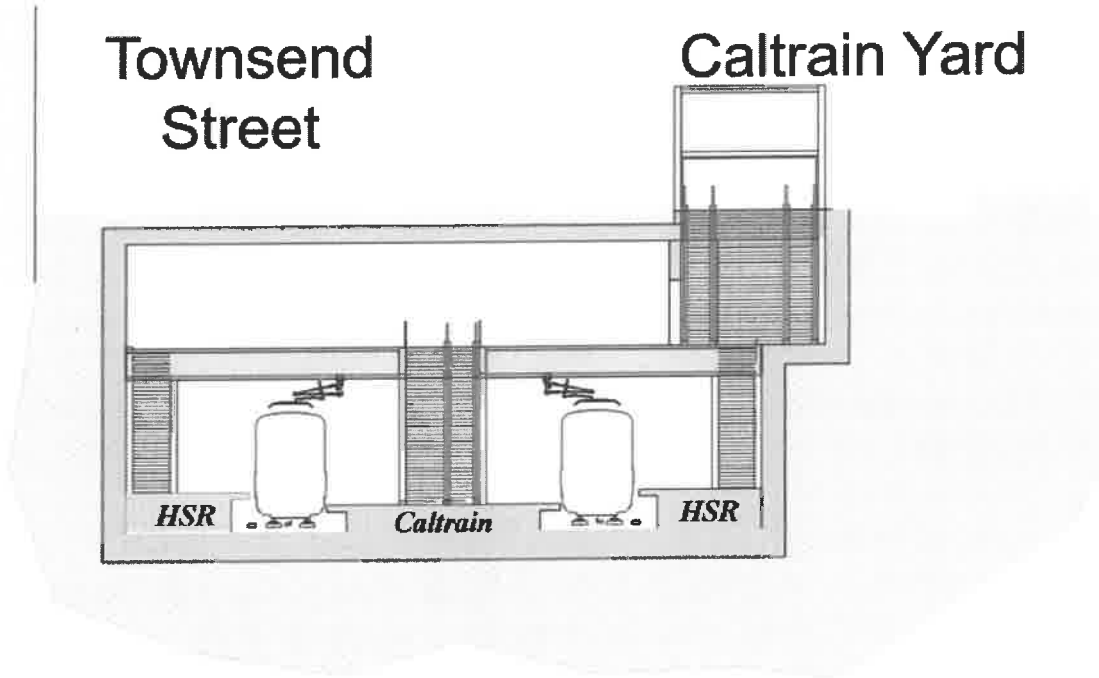


- 5) BART/MUNI connector development should be advanced immediately by transferring responsibility for project delivery to BART and MUNI.



6) **Fourth & Townsend station design introduces a single point of failure**

The elimination of passing track(s) makes it impossible to pass through the station in the event of an emergency



Respectfully submitted for your consideration

Sincerely,

Roland Lebrun

CC

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Caltrain Board of Directors
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