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**PUBLIC COMMENT, SFCTA BOARD AGENDA ITEM 8 - CMP**

1 message

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**Mary Miles** <[page364@earthlink.net](mailto:page364@earthlink.net)>  
To: [clerk@sfcta.org](mailto:clerk@sfcta.org)

Tue, Dec 7, 2021 at 7:55 AM

FROM:

Mary Miles (SB #230395)

Attorney at Law for Coalition for Adequate Review

[364 Page St., #36](#)[San Francisco, CA 94102](#)

TO:

Clerk of the Transportation Authority,

Tilly Chang, Director, and

Chair and Members of the Board of San Francisco County Transportation Authority (SFCTA)

[1455 Market Street, 22nd Floor](#)[San Francisco, CA 94103](#)BY EMAIL TO: [clerk@sfcta.org](mailto:clerk@sfcta.org)**PUBLIC COMMENT, December 7, 2021 SFCTA AGENDA ITEM 8 [Resolution Approving SFCTA'S 2021-2022 San Francisco CMP]**

This public comment on SFCTA Agenda Item 8 **OBJECTS** to approval of SFCTA's 2021/2022 Congestion Management Program (CMP). Please distribute copies of this Comment to all members of the SFCTA Board and place copies in all applicable files.

Due to SFCTA's inadequate and inaccurate notice of this meeting and failure to provide necessary materials, this Comment is necessarily incomplete.

This Board must reject SFCTA's Resolution Approving the 2021/22 CMP and must reject the CMP itself, because SFCTA has not complied with California's Congestion Management law. (Cal. Gov. Code §§65088 *et seq.*)

Further, SFCTA's notice of less than 72 hours for this December 7, 2021 meeting violates the Brown Act. (Gov. Code §§ 54950 *et seq.*) This Board must cease and desist from SFCTA's ongoing and repeated violations of the Brown Act, and it must POSTPONE this meeting and every Agenda Item, including Item 8, until SFCTA complies with the Brown Act and other open meeting and public information requirements.

**I. SFCTA AGAIN VIOLATES BROWN ACT REQUIREMENTS BY FAILING TO POST TIMELY NOTICE OF THIS MEETING, ITS AGENDA, PACKET, AND MATERIALS NECESSARY FOR PUBLIC PARTICIPATION**

Having many times requested timely notice of SFCTA's meetings, SFCTA has again failed to provide the required 72 hours of notice, *even* requested emailed notice. The "notice" of this meeting was again emailed to this Commenter at 11:45 p.m. on Friday, December 4, 2021.

The Agenda is inaccurate, since it conflicts with packet materials that state that another hearing and final action on the Item 8 issue will be on December 14, 2021, *not* December 7th as indicated on the December 7, 2021 SFCTA Agenda.

This meeting must now be continued until SFCTA complies with the Brown Act's requirements to provide public notice of SFCTA meetings, agendas, and related materials at least 72 hours in advance of meetings at a location that is open to the public. (Gov. Code §§54950 *et seq.*, 54950.5, 54957.5, 54960.) This unelected Board must *not* hear or consider any Items, including Item 8 at issue here, on the Agenda for the SFCTA meeting of December 7, 2021.

The public's right to make informed public comment is undermined by SFCTA's inadequate notice, incorrect Agenda, and the large volume of complex materials for meaningful public comment that are not readily available. (*Ibid.*; see also, *e.g.*, Gov. Code §65089(a).)

This meeting must be continued to provide adequate public notice under the Brown Act and the opportunity for the public to be heard and provide informed public comment.

## **II. SFCTA's CMP FAILS TO COMPLY WITH STATE LAW GOVERNING CONGESTION MANAGEMENT PROGRAMS (CMP)**

The CMP fails to comply with the Congestion Management Program law and must not be approved in the proposed legislation at Item 8. (Gov. Code §§65088 *et seq.*)

### **A. SFCTA's CMP Fails To Include The Required Roadway System, Including Existing And New Freeways, Ramps, And Arterials**

To begin the required CMP and Level of Service ("LOS") analysis, CMP law requires that SFCTA have an up-to-date list of the roadway system in the City and County of San Francisco that must include "at minimum all state highways and principal arterials." (Gov. Code § 65089(b)(1)(A).) "No highway or roadway designated as part of the system shall be removed from the system." (*Id.*)

"All *new* state highways and principal arterials shall be designated as part of the system, except when it is within an infill opportunity zone." (Gov. Code § 65089(b)(1)(A)[emphasis added].)

SFCTA's CMP has *no* current or updated list of the roadway system as required. (Gov. Code §65089(b)(1)(A).) Instead, SFCTA uses an undated, pre-computer-age typewritten document at CMP, Appendix 3, that does not accurately describe the existing roadway system. The CMP falsely claims that its "roadway network includes all freeways and state highways, as well as principal arterials." (CMP, p. 12.) The CMP, p. 14, absurdly shows a map with no street names or legend that does not as required accurately represent the roadway system.

SFCTA's CMP, p. 13, presumes it may define "principal arterials," but those designations are defined at the state and federal levels by both CalTrans and the FHWA. (See, *e.g.*, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=026e830c914c495797c969a3e5668538>; see also, *e.g.*, Gov. Code §65089(b)(1)(A).) SFCTA does not have authority to change those definitions or the actual arterials.

The CMP's "Non-Automobile Networks" (CMP, p. 15) are irrelevant, because the CMP's purpose is to specify where roadway traffic is congested, not describe recreational facilities. (Gov. Code §65088, 65089.)

The ancient (1991) roadway network document typewritten at CMP Appendix 3 has freeways that no longer exist, and it excludes newer freeway segments and new freeway ramps and arterials. For just one example, the CMP fails to include the significantly congested Central Freeway with ramps that back up at all peak

hours and other times onto the freeway. The new major arterial called "Octavia Boulevard" that is also *not* listed in the CMP, spreads congestion to surrounding streets including already congested arterials such as Fell, Oak, Gough, and Franklin Streets. The CMP fails to mention the routine AM and PM gridlock for 90,000 daily commuters on those major arterials, and others affected by the Octavia arterial. That is just one example of the CMP's omissions. Many travelers using other arterials and freeways face similar severe congestion to reach their San Francisco destination or get home on the San Francisco roadway system. Those and other arterials, freeways and segments must *all* be accurately listed, and SFCTA may *not* remove past freeways, freeway ramps, and arterials from the required updated roadway list. (Gov. Code §65089(b)(1)(A).)

An up-to-date list and a map with street names must be provided that includes *all* current existing arterials, freeways, and ramps *before* SFCTA may conclude that any of them are "exempt" for any reason or are located "within an [IOZ]." (Gov. Code §65089(b)(1)(A).)

If SFCTA contends any of those freeways, ramps, and arterials are exempt from CMP requirements, it must provide supporting evidence, which is entirely absent from its proposed CMP document.

SFCTA'S CMP incorrectly implies that it does not have to include *all* major arterials and freeways or any segment that was operating at LOS F in 1991, when it produced Appendix 3. SFCTA is plainly wrong, since the requirement includes "at minimum" all current freeways and major arterials. (Gov. Code §65089(b)(1)(A).)

### **B. SFCTA's Designated "Infill Opportunity Zones" (IOZ's) No Longer Apply Since the Drastic Service Cuts By SFMTA, Street Closures And Obstructions, And Changed Freeways And Arterials**

CMP law requires that SFCTA have an up-to-date list of the roadway system in the City and County of San Francisco that must include "Infill Opportunity Zones" ("IOZ's"). (Gov. Code § 65088.1(e).)

An "Infill Opportunity Zone" (IOZ) is defined as "a specific area...that is within one-half mile of a major transit stop...[and] includes major transit stops that are included in the applicable regional transportation plan." (Gov. Code §65088.1(e).)

A "major transit stop" is "a site containing...(a) An existing rail or bus rapid transit station; (b) A ferry terminal served by either a bus or rail transit service; (c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." (Pub. Res. Code §21064.3.)

"A high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours." (Gov. Code §65088.1(e).)

The City may designate an IOZ "by adopting a resolution after determining that the [IOZ] is consistent with the general plan and any applicable specific plan and is a transit priority area within a sustainable communities strategy or alternative planning strategy adopted by the applicable metropolitan planning organization." (Gov. Code §65088.4.)

However, an IOZ must first meet the basic requirements of Gov. Code §65088.1(e).

#### **1. No Evidence Is Provided Supporting The CMP's Designation Of Nearly All of San Francisco As One Big IOZ**

SFCTA's CMP fails to comply with the essential requirement to show with substantial supporting evidence that its designation of a huge area encompassing nearly the entire City and County as an IOZ meets the requirements of section 65088.1(e).

SFCTA's CMP falsely claims that nearly all of San Francisco is one big IOZ. Contrary to the CMP's claim, an IOZ is a "specific area" that is served by BRT's, ferry terminals with bus or rail transit service, or is at the intersection of two or more major bus routes with service intervals of 15 minutes or less during peak hours.

(Gov. Code §65088.1(e).) Those specific areas that qualify as IOZ's are not accurately mapped or described in the CMP.

The CMP refers to Board of Supervisors December 18, 2009 Resolution 494-09, which does *not* contain the referenced "IOZ Map in BOS File No. 091335." Even if found in that file, the 2009 IOZ Map is *not legible*, has *no* street names and *no* legend providing distances or scale of miles. (See BOS File No. 091335, 2009 IOZ Map 1-3.)

CMP Appendix 5, at page 4, Figure A5-3 displays another Map entitled "Segments Exempt Due to Location with Infill Opportunity Zone." No source or date is given for that Map. The CMP contains *no* supporting evidence that the alleged IOZ's on that map meet the requirements of Gov. Code §65088.1(e).

The CMP provides no way to determine how and why the criteria for designating an IOZ were met. (Gov. Code §65088.1(e).) In short, the IOZ Map is useless for determining where any IOZ's in San Francisco are located. Without that crucial information, the 2009 map and Board of Supervisors Resolution that SFCTA relies on are meaningless.

SFCTA's CMP claims the entire City and County is a "specific area" instead of the required actual IOZ areas in a complete list of freeways and arterials that are not served by BRT's, ferry terminals with bus or rail transit service, or at the intersection of two or more major bus routes with service intervals of 15 minutes or less during peak hours. (Gov. Code §65088.1(e).)

As noted above, an "IOZ" is defined as "a specific area . . . that is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. . ." that has at least a 15-minute frequency. (Cal. Gov. Code §65088.1(e).)

The IOZ Map and Board of Supervisors 12/18/09 Resolution 494-09 are unsupported, and the CMP's IOZ designation is inaccurate and unreliable, and therefore is useless to determine compliance with Gov. Code section 65088.1(e), because there is no way from those documents to determine where specific IOZ areas are designated that qualify as an IOZ.

The CMP's outdated, inaccurate IOZ Maps and its 2009 BOS Resolution do not support IOZ designation, since they do not show the freeways, ramps and arterials that must be included in the analysis, and because the CMP provides no supporting evidence that its IOZ designations comply with Gov. Code §65088.1(e).

Furthermore, SFCTA's CMP fails to acknowledge and provide essential information on *changes* to the roadway system and transit service that necessarily affect designation of IOZ's. The CMP also fails to provide essential information on changes in development and land use since 2009 that eliminate the possibility of more "infill" development in many areas of San Francisco.

## 2. SFMTA Has Eliminated Transit Stops And Reduced Service In Many Areas

Due to MTA's drastic cuts to bus lines and bus stops, and frequency of stops, many areas no longer qualify as IOZ's as defined in the Congestion Management Law. (Gov. Code §65088.1(e).)

City's Municipal Transportation Agency ("MTA") has eliminated transit stops and even entire bus lines. (See, e.g., <https://www.sfmta.com/travel-updates/temporary-stop-relocations> .) The result is that many areas claimed to be IOZ's exempt from analyzing and mitigating traffic congestion **no longer qualify as IOZ's**, since they are more than one-half mile from a "major transit stop" with "a frequency of service interval of 15 minutes or less" during peak commute periods. (Gov. Code §65088.1(e).)

SFCTA's CMP *fails* to provide the necessary evidence to determine whether areas of the City with reduced and inadequate service meet the basic qualifications to be designated IOZ's. Are they less than one-half mile from a major transit stop with a "frequency of service interval of 15 minutes or less" during peak commute periods? (Gov. Code §65088.1(e).) Where in the CMP are the new arterials where traffic is diverted from other arterials that MTA has in fact closed?

Major arterials have eliminated transit stops. For example, more than half the stops have been eliminated on Van Ness Avenue (US Highway 101). Another example: entire bus routes have been eliminated or have drastically reduced service.

Those areas where major transit stops have been eliminated no longer qualify as IOZ's.

SFCTA's CMP fails to acknowledge these facts or to appropriately analyze whether areas are legally qualified to be IOZ's.

### **3. SFMTA Has Reduced Service Frequency In Many Areas**

SFMTA has not only reduced the number of stops, but it has also reduced the *frequency* of stops at many remaining transit stops within its "Core Service Network." (See, *e.g.*, <https://www.sfmta.com/getting-around/muni/routes-stops/weekday-frequency-guide> [showing daily frequency of 15 or more minutes on Muni routes 2, 18, 19, 23, 25, 27, 31, 33, 35, 36, 37, 39, 48, 62, 54, 55, 56, 57, 58, 66, and 67].)

SFCTA's CMP does not factor the necessary data affecting service frequency to determine whether the surrounding areas of this deficient service qualify as IOZ's. (Gov. Code §65088.1(e).)

### **4. MTA Continues Its Deficient On-Time Record In Violation Of The San Francisco Charter**

With its 1.5 billion-plus annual operating and capital budgets and more than 7,000 employees, including more than 900 in its "Sustainable Streets" division alone, MTA has persistently failed to comply with the San Francisco Charter's requirement to provide 85% of on-time transit trips. (SF Charter, § 8A.103(c)(1).) The CMP admits that even though ridership has drastically declined since the 2020 pandemic and is now about 50% of pre-pandemic ridership, MTA is still unable to accomplish the Charter's on-time requirement. In 2021-2022 MTA's on-time performance was **48%**. (CMP, p. 58.)

### **5. Many Streets And Arterials Have Been Closed And Obstructed Causing Congestion On Other Arterials, Streets, And Freeways**

SFCTA's CMP fails to acknowledge MTA's closure of many streets under MTA's "Slow Streets" project, which divert congestion to other arterials and also affect freeway entrances and exits. The CMP likewise fails to even mention the City's Recreation and Parks Department's closure with no public hearing of major arterials including the Upper Great Highway between Lincoln Way and Sloat Boulevard, JFK Drive, and other arterials to and through Golden Gate Park, causing additional congestion on streets in surrounding areas.

Those surrounding streets where traffic has been diverted by street closure and obstruction should now be designated major arterials for purpose of the CMP, not ignored and subjected to "traffic calming" projects that worsen the congestion impacts from MTA's street closures.

SFCTA's CMP and City's Board of Supervisors must provide an up-to-date, accurate proposed designation of *each* IOZ and the necessary supporting evidence that its designation meets the requirements of CMP law, including Gov. Code §65088.1(e). That proposed designation and supporting evidence must be on the agenda and heard at a properly-noticed public meeting.

### **C. SFCTA's CMP Fails To Comply With LOS Analysis Requirements**

The law requires that the CMP analyze its roadway system, including "at minimum" all major arterials and freeways to determine levels of congestion under Level of Service ("LOS") methodology. (Gov. Code § 65089(b)(1).) "All new state highways and principal arterials shall be designated as part of the system, except when it is within an infill opportunity zone." (Gov. Code §65089(b)(1)(A).)

"In no case shall the LOS standards established be below the level of service E or the current level, whichever is farthest from level of service A except when the area is in an infill opportunity zone. When the level of service on a segment or at an intersection fails to attain the established level of service standard

outside an infill opportunity zone, a deficiency plan shall be adopted pursuant to Section 65089.4." (Gov. Code §65089(b)(1)(B).)

As noted, the CMP fails to meet the law's requirement to accurately designate IOZ's, and its past IOZ designation in 2009 of most of the City is not supported by evidence that it meets the legal criteria for designating IOZ's. (See discussion of IOZ's, *ante.*) Moreover, the dubious Map (Exhibit B) fails to meet the defined requirements of section 65088.1(e).

The CMP's claim is therefore unsupported that it need not conduct LOS analysis on its roadway system, which must include all freeways and at minimum principal arterials. (Gov. Code §65089(b)(1)(A).)

### 1. SFCTA'S CMP completely ignores the LOS requirement

The CMP (pp. 19-20) claims that it need not analyze LOS on *any* roadways, arterials or freeways, making two claims, neither of which are supported.

First, the CMP claims that roadways it has previously failed to analyze are exempt, because "[f]acilities that were already operating at LOS F at the time of baseline monitoring conducted to develop the first CMP in 1991, are legislatively exempt from the LOS standards." (CMP, p. 19; CMP Appendix 5, pp. 4-5 [showing two maps of the many streets it claims are exempt from analysis because they were at LOS "F" in 1991].) The CMP provides no citation to any legal authority for that claim, and there is none in the CMP law.

In fact, contrary to the CMP's mistaken assumption, the purpose of requiring *biennial* CMP's is to alleviate *current* congestion. By excluding all of the segments that in 1991 had *and today continue to have* the worst congestion in San Francisco, the CMP avoids the law's central purpose and requirement to address and alleviate that severe congestion. (See, *e.g.*, Gov. Code §65088 (a); 65089(b)(1)(B).) The consequence of SFCTA's failure to comply with the law's requirement for current data is that the severe congestion (that the CMP claims it need not address) persists and worsens on San Francisco's freeways and arterials.

Incredibly, the CMP claims it need not measure freeway congestion at all. (CMP Appendix 5, p. 7.) That claim is contrary to the law, which requires analysis of "at a minimum all state highways and principal arterials." (Gov. Code § 65089(b)(1)(A).)

The CMP's roadway user data shows a drastic decline in both bicycles and pedestrians, and that a large portion of travelers commute or visit San Francisco in vehicles, not by walking, or riding bicycles. (CMP, pp. 49 [drastic decline in bicycle mode share]; p. 50 [drastic decline in pedestrian counts]; p. 57 [showing "combined mode split" for bicycles of 1.8%].) The CMP, however, omits the effect of this data on roadway congestion.

The CMP's second rationale for refusing to conduct the required LOS analysis on San Francisco's congested roadways is that since "much of San Francisco are an Infill Opportunity Zones [*sic*], most CMP segments in San Francisco are exempt from minimum LOS standards." (CMP, p. 20.)

The CMP is again wrong, both because it relies on claiming without evidence that nearly the entire City is an IOZ, and because SFCTA is required to conduct this analysis of its congested roadways every two years regardless of past claims. (Gov. Code §65089(b)(1)(A); see also, discussion of IOZ, *ante.*)

### 2. The CMP's Claimed "LOS Monitoring Results" Are Not Based On Factual Data Or The Required HCM Methodology For Analyzing LOS

The CMP claims it has created "LOS Monitoring Results." However, it has not properly conducted LOS analysis, since it has not measured *delay* under the LOS standard. Instead, the CMP claims it has measured "average travel speeds," which is not the same as measuring roadway and intersection delay as required. (See, *e.g.*, CMP, Appendix 5, p. 7.) The law explicitly requires LOS analysis under Highway Capacity Manual methodology. (Gov. Code §65089(b)(1)(A).)

The appropriate measurement under the required LOS methodology is of *delay* (which measures congestion), not of speed (which does *not* measure congestion). (Gov. Code §65089(a)(1)(A) [requiring LOS

to be measured with methodology in Circular 212 and the Highway Capacity Manual].) LOS measurement *does* measure and quantify congestion by measuring delay. (*Ibid.*)

The CMP has *no* LOS data or *any* measurement of congestion, because the CMP fails to measure LOS to assess delay and excuses itself from the LOS analysis requirement. (Gov. Code §65089(a)(1)(A).)

Instead the CMP fills hundreds of pages with irrelevant data that does *not* as required disclose the congestion on San Francisco arterials and freeways. Nor does it satisfy the purpose of the law to create a plan to alleviate that congestion.

Thus, congestion in San Francisco has continued unabated, since the CM law was legislated in 1991, *more than 20 years ago*, while SFCTA has continued to ignore roadway conditions and failed to properly analyze them.

### **C. SFCTA Must Prepare A Deficiency Plan For All Congested Roadways, Freeways, And Arterials Falling Below LOS "E"**

The CMP fails to include a deficiency plan, because it has persistently defied the requirement to conduct LOS analysis on its roadway system. (Gov. Code §§ 65089(b)(1)(B); 65089.3(c); 65089.4.) The plan must alleviate traffic congestion, not create more.

### **D. The CMP Must Correct Its Inaccuracies, Errors And Omissions**

To correct its inaccuracies, errors and omissions, SFCTA's outdated CMP must:

1. Include all freeways, highways, and at a minimum all principal arterials in the *current* roadway system of San Francisco. (Gov. Code §65089(b)(1).) "In no case shall the LOS standards established be below the level of service E or the current level, whichever is farthest from level of service A except when the area is in an infill opportunity zone." (Gov. Code §65089(b)(1)(B).)

2. If the CMP claims exemption from LOS analysis based on IOZ's, those IOZ's must be accurately designated with a valid, up-to-date basis for that designation supported by accurate evidence provided to the public in advance of their designation. Designation of IOZ's must be updated in advance of preparing the CMP, and must be designated at a noticed public hearing. (Gov. Code § 65088.1(e).) Only currently and validly designated IOZ's can support any claim of exemption of a freeway, principal arterial, or segment from LOS analysis. (Gov. Code §65089(b).)

3. Every principal arterial and highway must be analyzed using correct LOS methodology to determine where roadway congestion is now occurring. (Gov. Code §65089(b).)

4. Even if CMP's claim of IOZ exemption of from LOS analysis is supported by providing evidence, the CMP must still analyze traffic congestion with another valid measurement system that actually measures congestion with quantified data.

5. Where congestion is significant on a segment or intersection (below LOS E), the CMP must provide a deficiency plan that will actually reduce traffic congestion.

## **CONCLUSION**

For the foregoing and other reasons, SFCTA's CMP does not comply with governing law, and its proposed approval must be rejected.

Further, SFCTA must cease and desist from its ongoing violations of the Brown Act, and it must postpone its December 7, 2021 hearing because it has failed to give legally adequate notice, its Agenda is inaccurate, and materials related to Item 8 are not readily available.

Mary Miles

Attorney at Law



**Date : 12/5/2021 9:13:46 AM**

**From : "'Aaron Goodman' via Clerk" clerk@sfcta.org**

**To : "Clerk of the Board Alberto Quintanilla" clerk@sfcta.org**

**Subject : Transportation Authority Board Meeting Comments - Dec 7 10:00am / A.Goodman**

As I am unable to attend the meeting please note the following comments to the board.

Item 2 - CAC minutes Dec. 1st meeting - Please note that prior as I submitted protective steps as part of the D7 community funds projects we pushed to have street areas near schools and transfer points recolored to make a strong visual change at boardings and unboardings for muni systems for seniors and children. The SFMTA balked at the proposal stating that any color changes would need to be approved. I had suggested light blue reflective zones near Sloat Commodore, Aptos, and near CCSF or any school or major transfer point along the K line on ocean ave. We had a slogan "Bee Safe" and submitted a cartoon sign safety sign to be installed along with bollards, bumps speed, and colored changes to make islands more visible. Yellow and Black curbed striped painting as well at platform curb edges, similar to downtown where you already have "do not step off curb" signs painted in text. This is a simple fix. This does not cost a fortune, and would immediately make a visual difference in the areas where children cross daily. That another child was hit is UNACCEPTABLE. The costs to fix this should be taken away from paving projects that just repave, more important to protect the pedestrian, than make the roadway smoother for faster vehicle travel.

Item 7 Congestion Management Presentation - Page 121 (Image of PM peak levels of service)

Indicate serious issues on Ocean Ave as a cross traffic used impact area. The need to look more seriously at SE to SW sector transit changes from D11 to D7 require some significant push by the SFCTA to deduce and investigate the situation adequately. With many larger projects in D7/D10/D11 traffic will significantly worsen unless steps are taken to remove car impacts or provide new mass-transit legs (AKA building train tracks!) to get people out of their cars and onto transportation. With discussion on 19th Ave rail why is there zero discussion on Sunset BLVD or improvements to north south routing of lines on the west side, such as I have suggested the L-Taraval back up sloat to west portal or the west-side of stonestown and parkmerced and sfsu growth? It also shows in D10 a lack of transit options or alternatives with many east side projects from Pier 70, Portereo Hill, BVHP, Schlage Lock and bayshore areas as neglected in equity and redevelopment or extension of train services cross town. This needs to change and show projects that will help the community get to jobs and retail centers. Nowhere in the document under planning projects has adequate research been done on the transit alternatives where stonestown, parkmerced, and SFSU-CSU growth is projected.

Page 155 - Connect SF and SFTP 2050

Page 164 shows diagrams freeway crossing comfort which shows red zones along alemany near the Mission crossing. We had suggested looking at the overpasses due to the bike lane changes made, along alemany to improve crossability between neighborhoods. There is a way to improve the crossings to the farmers market at

the mission overpass, and over near the sloped hill area that leads up to Balboa Park, these are micro projects that could implement creative solutions, (food truck court and terraces at the sloped area down the stairs adjacent to the mission/alemany overpass.) and bike lane second phase improvements for a bike-pedestrian improvement along alemany to the farmers market using broadened walking paths and pedestrian/cyclist separated areas with tree-plantings and a bridged cross-over down from the existing overpass turn heading east to the market area. (Think of the possibilities and walk/drive it to see the issues)

Page 164 Brotherhood Alemany redesign - ignores entirely the extension that goes from the current redevelopment at the market area in METNA to the alemany fly-over I-280 and 19th Ave. So from Brotherhood Way 1952 interchange south to Daly City BART there is a no-mans land that is consistently ignored in how to alleviate traffic and get people walking and biking safely cross the county lines from Daly City to SF redevelopment areas. That is negligent in how to deal with Lakeshore, Daly City Mall and traffic impacts, and the connectability between counties. Bi-county cooperation is needed here, and a plan that stimulates use of BART Daly City Parking lots and aged infrastructure to rebuild and use air-rights and massive interchanges to re-create urban destinations and entry points. An international transit/architectural competition, or more significant planning endeavours are needed. This was termed "level 5 Tier federal transit" costs and concerns. The lacking information during Parkmerced's project and ongoing negligent action towards the traffic areas and crossings make juniperro serra and ocean more hazardous. The Alemany crossings and congestion on 19th and brotherhood worsen when only light and pavement changes are made yearly. When construction begins on Parkmerced or further SFSU-CSU and stonestown projects this will again impact the area negatively. From item labeled 4 on this south to the Interstate 1 symbol and south to daly city bart MUST be a project and proposal included in the SFCTA and planning. It has been ignored TOO LONG, and should be on the docket as part of the equity, hub redevelopments and planning for 2050! Page 169 re-emphasizes this with areas where red dominates. The diagrams on page 170 ignore again the possible dashed routes on the west-side and a more serious connector between D10 to D7 through D11 on geneva harney as a light rail extension of the F-Line T-Line down to schlage and around the BVHP and up to Balboa Park Station. The need to plan for the topography and route along Geneva Harney must be more than the bus rapid transit lines, and look at subway or above grade rail designs that loop quickly around the perimeter of SF.

I for one do not approve of more taxes, when equity issues and lacking balanced vision proposals ignore these SW to SE sector transit areas. Too much money sinks to downtown projects and pavement work, while real rail improvements links, loops and extensions, are ignored while sinking money in micro projects vs. community safety and rail network build-out.

Sincerely

Aaron Goodman D11