



San Francisco Tomorrow

Since 1970, Working to Protect the Urban Environment

February 2, 2009

Ashley Nguyen, Planning Section
Metropolitan Transportation Commission
101 Eighth Street, Oakland, CA 94607

Re: COMMENTS ON THE 2035 TRANSPORTATION PLAN EIR

Dear Ms. Nguyen;

On behalf of San Francisco Tomorrow, we would like to express the following concerns about the above-referenced document.

First, the plan analyzed by this document calls for freeway expansion, which will result in more automobile traffic. But the document fails to evaluate or even mention the additional deaths and injuries from automobile accidents that occur as a result of this increase in vehicle miles traveled (VMT). The attached document re Doyle Drive should prove that freeways are more dangerous than the supposedly dangerous Doyle Drive, which had its last fatal accident in 2003. It is certain that should it be replaced by a freeway, as is proposed in the preferred program, there will be deaths on it every year. It should be easy to see that freeways are generally more dangerous than other types of roadways. This impact must be adequately addressed.

Second, the preferred plan discourages smart growth, transit and transit oriented development. It will cause more sprawl, more loss of open space, more loss of farmland. Alternatives that would have been better from these viewpoints were dismissed. This document identifies the "HEAVY MAINTENANCE/CLIMATE PROTECTION + PRICING STRATEGIES" alternative as the environmentally superior alternative, while dismissing the "HEAVY MAINTENANCE/CLIMATE PROTECTION + LAND USE" alternative as not implementable. However that ignores state legislation AB 375, which will provide incentives for regional integration of land use planning and transit-oriented development. We strongly recommend that the EIR identify an environmentally superior alternative that combines the "HEAVY MAINTENANCE/CLIMATE PROTECTION + PRICING STRATEGIES" alternative with appropriate land use restrictions. MTC must work with other agencies and cities and counties to adopt land use plans that would advance smart growth, and transit and transit oriented development

Thirdly, the claim has been made that 85% of the money available for transportation projects has already been committed. Apparently "committed" means carried over from the T2020 Plan. In a letter dated August 10, 2008, Attorney General Brown threw doubt on this and urged you to review these projects and change the priorities. San Francisco Tomorrow supports this position and requests that this EIR identify a program that redirects funds from projects that will do great harm to the environment to ones that will do less harm to the environment and will advance smart growth, transit and transit oriented development. The statement has been made that other agencies are

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providing funds for some of the "committed" projects and therefore MTC has no power over them. MTC has more power than it admits publicly. MTC should use its influence to change these priorities.

Finally, another thing that requires closer scrutiny is the emphasis on level of service (LOS). A LOS of E or F might actually be good for the environment if it discourages auto use and encourages transit ridership. Furthermore, SFT notes that level of service is not actually in the CEQA law itself, but is in CEQA administrative guidelines, and that these are being revised to be more *environmentally friendly*. LOS could possibly be ignored by local agencies. If used, LOS should measure the movement of people, not vehicles.

To conclude: we find that the preferred program is seriously flawed in that it fails to prioritize transit options, identify needed land use controls, and attain the climate change goals mandated in AB 32. The environmental document is also flawed because it fails to identify the most environmentally beneficial program, discounts the serious environmental impacts of road expansion and does not acknowledge the benefits of transit-oriented development. These shortcomings must be addressed in the final document issued by this agency.

Sincerely,



Jennifer Clary
President



Norman Rolfe
Transportation Chair

DOYLE DRIVE -- MYTHS AND FACTS

Myth: It is seismically unsafe and generally in poor condition.

Fact: Caltrans is working on it right now. Seismic bracing has been done and replacement of corroded structural members is in process, as is general work such as replacing corroded parts, scraping off rust, repainting, etc. At an October 17 public meeting, Tilly Chang of the San Francisco County Transportation Authority (SFCTA) stated that Doyle Drive is not about to fall down. This from someone who is part of the cabal that is pushing to convert it into a freeway through a park on the pretense of safety.

Myth: It is a dangerous roadway. It doesn't meet today's standards.

Fact: Here are accident statistics obtained from the California Highway Patrol (CHP) for the years 2004-2006 inclusive.

<u>Highway Segment</u>	<u>Length Miles</u>	<u>Total Collisions</u>	<u>Persons Injured</u>	<u>Persons Killed</u>	<u>Deaths per Mile per Year</u>
US 101 --Golden Gate Bridge Toll Plaza to Richardson Ave. -- Doyle Drive	2.12	184	64	0	0
I-80 -- Bay Bridge Anchorage to Junction with US 101	2.01	2279	519	5	0.83
US 101 -- Junction with I-80 to San Francisco-San Mateo County Line	4.25	1529	606	5	0.39
US 101 -- San Francisco-San Mateo County Line to Grand Ave. South SF	4.35	398	180	7	0.54
I-80 -- Macarthur Maze to Gilman St.	3.44	2507	637	9	0.87
I-880 -- Macarthur Maze to Junction with SR 238	13.27	4091	1470	23	0.58
SR 24 -- East End Caldecott Tunnel to Junction with I-680	8.83	898	408	4	0.15
I-680 -- Junction with SR 24 to Stone Valley Road	4.17	751	251	1	0.08
Doyle Drive	2.12	184	64	0	0

Note that the freeways that meet or come close to the "standards" they want Doyle Drive to meet are the ones killing people.

Speed Kills! It certainly does on highways.